Appendix I

Examples of the Completion of the FinCEN Currency Transaction Report ("CTR") for Transactions Involving Armored Car Services

1. Bank A – Single reportable transactions conducted by an armored car service on behalf of a bank or on behalf of a bank's customer

On the same business day, Bank A receives currency deposits for the accounts of two accountholders, as follows:

- 1.1. Jack's Restaurant is a large cash business that is a customer of Bank A. Bank A has contracted with Armored Car Service One ("ACS One") to pick up the cash from Jack's Restaurant and transport it to Bank A's account with the Federal Reserve. ACS One picks up \$21,000 in cash from Jack's Restaurant and delivers it to the Federal Reserve. Bank A will complete the CTR reflecting this transaction as follows:
 - Part I (1 of 1) will show Jack's Restaurant's corporate information, checking boxes 2c ("Person on whose behalf transaction was conducted") and "Check if entity," and inserting in item 21 the deposited amount (\$21,000) and Jack Restaurant's account number.
 - Part II will show the \$21,000 deposited in section 25a, checking box 24 ("Armored Car (FI Contract)").
 - Part III will contain Bank A's information as the financial institution where transaction took place.

The completed CTR is shown on pages 6 through 9 of this guidance.

- 1.2. Bob's Warehouse is a large cash business that is a customer of Bank A. Bob's Warehouse has contracted with Armored Car Service One ("ACS One") to pick up the cash from the warehouse and transport it to Bank A for deposit into Bob's Warehouse account. ACS One picks up \$21,000 in cash from Bob's Warehouse and delivers the cash to Bank A. Bank A will complete the CTR reflecting this transaction as follows:
 - Part I (1 of 2) will show Bob's Warehouse corporate information, checking box 2c ("Person on whose behalf transaction was conducted") and "Check if entity," and inserting in item 21 the deposited amount (\$21,000) and Bob's Warehouse account number.
 - Part I (2 of 2) will show ACS One's corporate information, checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the amount delivered by ACS One on behalf of Bob's Warehouse (\$21,000) and Bob's Warehouse account number.
 - Part II will show the \$21,000 deposited in section 25a.
 - Part III will contain Bank A's information as the financial institution where transaction took place.

The completed CTR is shown on pages 10 through 14 of this guidance.

Even though ACS One made a currency delivery of \$21,000 acting on behalf of a person other than Bank A, no separate CTRs need to be filed on ACS One's delivery.



Version Number: 1.2

Filing Name	ACS Delivery O/	/B FI (1.1)		
*1 Type of filing		Correct/amend prior report	FinCEN directed Backfiling	
Document Control Numb	per / BSA Identifier			
Save	Validate		Print	
By providing my PIN	, I acknowledge th	nat I am electronically signing	the BSA report submitted.	
		Sign with PIN		

Part I Person Involved in Transaction 1 of 1									
	on own behalf	b ☐ Person conducting transaction for another c ☒ Person on whose behalf transaction was conducted d ☐ Courier Service (private)							
3 Multiple tran									
Check									
*4 Individual's last name or entity's legal name	Unknown	Jack's Restaurant							
*5 First name	Unknown								
6 Middle name									
Suffix									
7 Gender									
8 Alternate Name									
9 Occupation or type of b	usiness	Food Service Business							
9a NAICS Code		722							
*10 Address	Unknown	123 Nice Lane							
*11 City	Unknown	Washington							
*12 State	Unknown	DC *13 ZIP/Postal Code Unknown 20005							
*14 Country	Unknown	US							
*15 TIN	Unknown	456123987 16 TIN type EIN							
*17 Date of birth	Unknown								
18 Contact phone number	er	2023536900 Ext.							
19 E-mail address		jack@jacksrestaurant.com							
*20 Form of identification	used to verify ic	entity Unknown							
Driver's licens	se/State ID	Passport Alien Registration Other Business Licsense							
Number DC123456		Country US Issuing State DC							
21 Cash in amount for in	21 Cash in amount for individual or entity listed in Item 4 \$								
	Acc	ount number 123654							
22 Cash out amount for i	ndividual or enti								
	bunt number								

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Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23	Date of transaction 11/08/2012				
24	⊠ Armored car (FI Contract)	☐ ATM ☐ Mail Depos	sit or Shipment	☐ Night Deposit	Aggregated transactions
*25	CASH IN: (in U.S. dollar equivalent)		*27 CASH OUT:	(in U.S. dollar equival	ent)
í	a Deposit(s) \$_	21,000.00	a Withdrawal(s)	\$.00
ı	Payment(s)	.00	b Advance(s) on c	credit (including markers)	.00
(Currency received for funds transfer(s) out	.00	c Currency paid from	om funds transfer(s) in	.00
(d Purchase of negotiable instrument (s)	.00	d Negotiable instru	ument(s) cashed	.00_
•	Currency exchange(s)	.00	e Currency exchar	nge(s)	.00
1	Currency to prepaid access	.00_	f Currency from p	repaid access	.00
9	Purchases of casinos chips, tokens and other gaming instruments	.00_		of casino chips, tokens, I other gaming instrument	.00
ı	Currency wager(s) including money plays	.00	h Payment(s) on w	vager(s) (including race	.00
i	Bills inserted into gaming devices	.00	i Travel and comp	olimentary expenses and centives	.00_
7	z Other (specify):		j Payment for tour promotions	rnament, contest or other	.00
_		.00	z Other (specify):		
	Total Cash in \$	21,000 <u>.00</u>	Total Cash out	\$.00
26	Foreign Cash in	Forei	gn Country		• •
28	Foreign Cash out	Forei	gn Country		• •

Part III Financial	Institutio	n Where Tra	nsaction(s)	Takes Plac	e 1 of 1	# 6	
*37 Type of financial	institution						
Other (specify)							
*29 Primary federal re	egulator		Office of the Co	omptroller of t	ne Currency (OC	C)	
38 If 37a - Casino/Ca	rd Club is c	hecked, indicate	type (check onl	y one)			
State licens	sed casino	Tribal autho	rized casino	Card club	Other		
*30 Legal name of fin	ancial instit	ution	Bank A				
31 Alternate name, e	e.g. trade na	ime, DBA					
*32 EIN	11232336	66					
*33 Address	1000 14t	n Street NW					
*34 City	Washing	ton					
*35 State		DC					
*36 ZIP Code	20005						
39 Financial institutio	n ID type	Research,	Statistics, Sup	ervision and [Discount (RSSD)	number	
ID number		12365422					
*40 Contact office		Compliance					
*41 Phone number		2024563100		E	xt.		
*42 Date Filed		(1	Date filed will be a	auto-populated wl	nen the form is signe	d.)	



Version Number: 1.2

Filing Name	ACS Del. O/B Cu	ustomer (1.2)		
*1 Type of filing	☑ Initial report	Correct/amend prior report	☐ FinCEN directed Ba	ckfiling
Document Control Numl	ber / BSA Identifier			
Save	Validate		Print	
By providing my PIN	I, I acknowledge th	nat I am electronically signing	the BSA report subr	nitted.
		Sign with PIN		

Part I Person Involv	ved in Trans	action 1 of 2	+ -				
*2 a Person conduction of transaction of Multiple transaction	on own behalf	b Person conducting transaction for another	c Person on w transaction v	hose behalf vas conducted d [Courier Service (private)		
Check							
*4 Individual's last name or entity's legal name	Unknown	Bob's Warehouse					
*5 First name	Unknown						
6 Middle name							
Suffix	Suffix						
7 Gender							
8 Alternate Name							
9 Occupation or type of b	ousiness	Storage Facility					
9a NAICS Code			493	3			
*10 Address	Unknown	123 Nice Lane					
*11 City	Unknown	Washington					
*12 State	Unknown	DC *13 ZIP/Postal Code Unknown 20005					
*14 Country	Unknown	US					
*15 TIN	Unknown	456123987	16 TIN type	EIN			
*17 Date of birth	Unknown						
18 Contact phone number	er	2023536900	Ext.				
19 E-mail address		bob@bobswarehouse.com					
*20 Form of identification	used to verify id	entity Unknown					
Driver's licen	se/State ID	Passport Alien Registratio	n 🛭 Other Busi	ness Licsense			
Number DC123456		Country	IS Is	suing State	DC		
21 Cash in amount for in	21 Cash in amount for individual or entity listed in Item 4 \$						
	Account number 123654						
22 Cash out amount for	individual or enti	ty listed in Item 4 \$					
	Account number						

Part I Person Invol	ved in Trans	action 2 of 2	+ -			
*2 a Person cond transaction of	on own behalf	b Person conducting transaction for another	c Person on w	hose behalf vas conducted d	Courier Service (private)	
Check						
*4 Individual's last name or entity's legal name	Unknown	Armored Car Service One				
*5 First name	Unknown					
6 Middle name						
Suffix	Suffix					
7 Gender						
8 Alternate Name						
9 Occupation or type of b	ousiness	Armored Car Service				
9a NAICS Code			492	1		
*10 Address	Unknown	55 West Street				
*11 City	Unknown	Washington				
*12 State	Unknown	DC	*13 ZIP/Postal	Code Unknown	20010	
*14 Country	Unknown	US				
*15 TIN	Unknown	654329874	16 TIN type	EIN		
*17 Date of birth	Unknown					
18 Contact phone number	er	2025551212	Ext.			
19 E-mail address		compliance@acsone.com				
*20 Form of identification	used to verify id	entity Unknown				
Driver's licen	se/State ID	Passport Alien Registration	Other Busi	ness License		
Number DC12456		Country	S Is	suing State	DC	
21 Cash in amount for individual or entity listed in Item 4 \$						
22 Cash out amount for						
	Acco			• •		

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Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23	Date of transaction 11/08/2012				
24	Armored car (FI Contract)	☐ ATM ☐ Mail Depo	osit or Shipment	☐ Night Deposit	Aggregated transactions
*25	CASH IN: (in U.S. dollar equivalent)		*27 CASH OUT	⁻: (in U.S. dollar equival	ent)
a	a Deposit(s) \$_	21,000.00	a Withdrawal(s)	\$.00_
k	Payment(s)	.00.	b Advance(s) on	credit (including markers)	
C	: Currency received for funds transfer(s) out	.00	c Currency paid	from funds transfer(s) in	.00
c	Purchase of negotiable instrument (s)	.00.	d Negotiable ins	trument(s) cashed	
e	Currency exchange(s)	.00	e Currency exch	ange(s)	.00
f	Currency to prepaid access	.00	f Currency from	prepaid access	.00
ç	Purchases of casinos chips, tokens and other gaming instruments	.00) of casino chips, tokens, nd other gaming instrument	ts .00
ŀ	Currency wager(s) including money plays	.00	h Payment(s) on and OTB or sp	wager(s) (including race ports pool)	.00
i	Bills inserted into gaming devices	.00	i Travel and cor book gaming i	mplimentary expenses and incentives	.00
Z	Other (specify):		j Payment for to promotions	ournament, contest or other	.00
_		.00	z Other (specify)	:	
	Total Cash in \$	21,000.00	Total Cash ou	s \$	
26	Foreign Cash in	Fore	eign Country		+ •
28	Foreign Cash out	Fore	eign Country		+ -

Part III Financial	Institutio	n Where Tra	nsaction	(s) Ta	kes Pl	ace	1 of 1		# G			
*37 Type of financial	institution	stitution Depository institution										
Other (specify)												
*29 Primary federal re	egulator	(Office of the	e Comp	otroller	of the (Currency (OCC)				
38 If 37a - Casino/Ca	rd Club is c	hecked, indicate	type (check	only on	ne)							
State licens	sed casino	Tribal autho	rized casino	o [Card c	lub	Other					
*30 Legal name of fin	ancial instit	ution	Bank A								 	
31 Alternate name, e	e.g. trade na	me, DBA										
*32 EIN	11232336	66										
*33 Address	1000 14t	n Street NW										
*34 City	Washing	ton										
*35 State		DC										
*36 ZIP Code	20005											
39 Financial institutio	n ID type	Research,	Statistics,	Supervi	ision an	d Disc	ount (RSS	SD) nur	nber			
ID number		12365422										
*40 Contact office		Compliance										
*41 Phone number		2024563100				Ext.						
*42 Date Filed		(1	Date filed will	l be auto-	populate	d when	the form is s	igned.)				

2. Bank B – Multiple transactions aggregating to a reportable amount

On the same banking day, Bank B receives currency deposits for the accounts of five accountholders, as follows:

- 2.1. Mr. Adams receives three deposits (for individual amounts in excess of \$10,000) for a total of \$37,500 in currency: \$11,000 is delivered by ACS One, an armored car service working on behalf of Bank B; \$15,000 is deposited by Mr. Adams himself; and the balance, \$11,500, is delivered by ACS Two, an armored car service acting on Mr. Adams's behalf.
- 2.1.1. If Bank B is able to determine which armored car service transactions were conducted on behalf of the bank and which ones were conducted on behalf of the bank's customer, Bank B will complete the CTR reflecting this transaction as follows:
 - Part I (1 of 2) will show Mr. Adams's personal information checking boxes 2a ("Person conducting transaction on own behalf") and 3 ("Multiple Transactions"), and inserting in item 21 the total amount deposited (\$37,500), and Mr. Adams' account number.
 - Part I (2 of 2) will show ACS Two's corporate information checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$11,500 delivered by ACS Two on Mr. Adams's behalf and Mr. Adams's account number.
 - Part II will show the total deposits of \$37,500 in section 25a, checking box 24 ("Armored Car (FI Contract)" to justify the \$11,000 delivered by ACS One on Bank B's behalf.
 - Part III will contain Bank B's information as the financial institution where transaction took place.

Parts I and II of the completed CTR are shown on pages 16 through 19 of this guidance.

- 2.1.2. If Bank B is unable to determine which armored car service transactions were conducted on behalf of the bank and which ones were conducted on behalf of the bank's customer, Bank B will complete the CTR reflecting this transaction as follows:
 - Part I (1 of 3) will show Mr. Adams's personal information, checking boxes 2a ("Person conducting transaction on own behalf") and 3 ("Multiple Transactions"), and inserting in item 21 the total amount deposited (\$37,500) and Mr. Adams' account number.
 - Part I (2 of 3) will show ACS Two's corporate information, checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$11,500 delivered by ACS Two and Mr. Adams's account number.
 - Part I (3 of 3) will show ACS One's corporate information, checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$11,000 delivered by ACS One and Mr. Adams's account number.
 - Part II will show the total deposits of \$37,500 in section 25a.
 - Part III will contain Bank B's information as the financial institution where transaction took place.

Parts I and II of the completed CTR are shown on pages 20 through 24 of this guidance.



Version Number: 1.2

Filing Name	ACS Multi. Trans	s. (2.1.1)		
*1 Type of filing	⊠ Initial report	Correct/amend prior report	FinCEN directed	d Backfiling
Document Control Nun	nber / BSA Identifier			
Save	Validate		Print	
By providing my PI	N, I acknowledge th	nat I am electronically signing	the BSA report s	ubmitted.
		Cian with DIN		
		Sign with PIN		

Part I Pers	on Involved in Trans	eaction 1 of 2	D D						
∠ a⊠ tr	Person conducting ransaction on own behalf Multiple transactions	b Person conducting transaction for another	c Person on w transaction v	hose behalf vas conducted d	Courier Service (private)				
	Check If entity								
*4 Individual's or entity's le		Adams							
*5 First name	Unknown	John							
6 Middle name	Э	A							
Suffix									
7 Gender		Male							
8 Alternate Na	ame								
9 Occupation	or type of business	Tax Preparation Services							
9a NAICS Cod	de		5412	2					
*10 Address	Unknown	120 North Street							
*11 City	☐ Unknown	Baltimore							
*12 State	Unknown	MD *13 ZIP/Postal Code Unknown 21022							
*14 Country	Unknown	US							
*15 TIN	Unknown	987456552	16 TIN type	SSN-ITIN					
*17 Date of bi	rth Unknown	11/10/1960							
18 Contact ph	one number	4108952011	Ext.						
19 E-mail add	ress	adam@taxservices.com							
*20 Form of id	entification used to verify i	dentity Unknown							
⊠ Di	river's license/State ID	Passport	Other						
Number 74578	39152321	Country US	j Is	suing State	MD				
21 Cash in an									
Zi Gasiiii'ali	21 Cash in amount for individual or entity listed in Item 4 \$ 37,500 Account number 654321								
22 Cash out a	amount for individual or ent				7 A A				
Account number									

Part I Person Involved in Transaction 2 of 2							
*2 a Person conditions action of transaction of Multiple transaction.	on own behalf	b Person conducting transaction for another	c Person on w transaction v	rhose behalf vas conducted d [Courier Service (private)		
Check							
*4 Individual's last name or entity's legal name	Unknown	Armored Car Service Two					
*5 First name	Unknown						
6 Middle name							
Suffix							
7 Gender							
8 Alternate Name							
9 Occupation or type of b	usiness	Armored Car Service					
9a NAICS Code			492	1			
*10 Address	Unknown	55 Pratt Street					
*11 City	Unknown	Baltimore					
*12 State	Unknown	MD *13 ZIP/Postal Code Unknown 21002					
*14 Country	Unknown	US					
*15 TIN	Unknown	885512366	16 TIN type	EIN			
*17 Date of birth	Unknown						
18 Contact phone number	er	4105551212	Ext.				
19 E-mail address		ACS2@ACS2.com					
*20 Form of identification	used to verify id	dentity Unknown					
Driver's licens	se/State ID	Passport Alien Registration	⊠ Other Busi	ness Licsense			
Number MD456456456		Country US	s Is	suing State	MD		
21 Cash in amount for in	21 Cash in amount for individual or entity listed in Item 4 \$						
	ACC	ount number 654321					
22 Cash out amount for i				_			
Account number							

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Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23	Date of transaction 12/19/2012						
24	⊠ Armored car (FI Contract)	☐ ATM ☐ Mai	l Deposit or S	hipment	☐ Night Deposit	☐ Aggregated tra	nsactions
*25	CASH IN: (in U.S. dollar equivalent)		*27	CASH OUT:	(in U.S. dollar equiv	alent)	
í	a Deposit(s) \$_	37,50	<u>0.00</u> a V	Vithdrawal(s)		\$.00_
ı	Payment(s)		<u>.00</u> b A	dvance(s) on c	redit (including marker	s)	.00
(Currency received for funds transfer(s) out		<u>.00</u> c C	Currency paid fro	om funds transfer(s) in		.00_
(d Purchase of negotiable instrument (s)		00_ d N	legotiable instru	ument(s) cashed		.00_
•	Currency exchange(s)		<u>.00</u> e C	urrency exchar	nge(s)		.00
1	Currency to prepaid access		<u>.00</u> f C	Currency from p	repaid access		.00
9	Purchases of casinos chips, tokens and other gaming instruments				of casino chips, tokens,	ents	.00
ı	Currency wager(s) including money plays			Payment(s) on wand OTB or spo	vager(s) (including race		.00
i	Bills inserted into gaming devices			ravel and compook gaming inc	olimentary expenses ar centives	d 	.00_
2	Z Other (specify):			ayment for tour promotions	rnament, contest or oth	er	.00
_			00 z O	ther (specify):			
						_	.00
	Total Cash in \$	37,50	<u>0.00</u> To	otal Cash out	;	.	.00_
26	Foreign Cash in		Foreign Cou	untry			Ð \varTheta
28	Foreign Cash out		Foreign Cou	untry			D O



Version Number: 1.2

Filing Name	ACS Multi. Trans	s. (2.1.2)		
*1 Type of filing		Correct/amend prior report	FinCEN directed	Backfiling
Document Control Numl	ber / BSA Identifier			
Save	Validate		Print	
D			41 DOA	h
By providing my PIN	ı, ı acknowledge th	at I am electronically signing	tne BSA report su	bmitted.
		Sign with PIN		

Part i Person invol	Part I Person Involved in Transaction 1 of 3					
*2 a Person conductransaction of Multiple transaction of Multiple transaction of	on own behalf	b Person conducting transaction for another c	Person on what transaction w	hose behalf vas conducted d [Courier Service (private)	
Check	☐ If entity					
*4 Individual's last name or entity's legal name	Unknown	Adams				
*5 First name	Unknown	John				
6 Middle name		А				
Suffix						
7 Gender		Male				
8 Alternate Name						
9 Occupation or type of b	ousiness	Tax Preparation Services				
9a NAICS Code			5412	2		
*10 Address	Unknown	120 North Street				
*11 City	Unknown	Baltimore				
*12 State	Unknown	MD *13 ZIP/Postal Code Unknown 21022				
*14 Country	Unknown	US				
*15 TIN	Unknown	987456552	16 TIN type	SSN-ITIN		
*17 Date of birth	Unknown	11/10/1960				
18 Contact phone number	er	4108952011	Ext.			
19 E-mail address		adam@taxservices.com				
*20 Form of identification	used to verify io	entity Unknown				
□ Driver's licen	se/State ID	Passport Alien Registration	Other			
Number 745789152321		Country US	Iss	suing State	MD	
21 Cash in amount for in	dividual or entity	listed in Item 4 \$	37,5	00		
	Account number 654321					
22 Cash out amount for	individual or enti	ty listed in Item 4 \$			_	
					+ •	
	, 100					

Part I Person Involved in Transaction 2 of 3							
_	on own behalf	Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private)					
*4 Individual's last name or entity's legal name							
*5 First name	Unknown						
6 Middle name							
Suffix							
7 Gender							
8 Alternate Name							
9 Occupation or type of b	usiness	Armored Car Service					
9a NAICS Code		49	221				
*10 Address	Unknown	55 Pratt Street					
*11 City	Unknown	Baltimore					
*12 State	Unknown	MD *13 ZIP/Postal Code Unknown 21002					
*14 Country	Unknown	US					
*15 TIN	Unknown	885512366 16 TIN type	EIN				
*17 Date of birth	Unknown						
18 Contact phone number	er	4105551212 Ext.					
19 E-mail address		acs2@acs2.com					
*20 Form of identification	used to verify id	entity Unknown					
Driver's licens	se/State ID	Passport Alien Registration Other Bu	siness Licsense				
Number MD458879622		Country	Issuing State MD				
21 Cash in amount for in	dividual or entity	listed in Item 4 \$ 11	1,500				
	Acc	ount number 654321	+ •				
22 Cash out amount for i	ndividual or enti	y listed in Item 4 \$					
Account number							

Part I Person Involved in Transaction 3 of 3							
*2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private) 3 Multiple transactions					Courier Service (private)		
Check *4 Individual's last name	☐ Unknown						
or entity's legal name	Unknown	Armored Car Service One					
*5 First name	Unknown						
6 Middle name							
Suffix							
7 Gender							
8 Alternate Name							
9 Occupation or type of b	usiness	Armored Car Service					
9a NAICS Code			4921				
*10 Address	Unknown	100 Lombard Street					
*11 City	Unknown	Baltimore					
*12 State	Unknown	MD *13 ZIP/Postal Code Unknown 21666					
*14 Country	Unknown	US					
*15 TIN	Unknown	368852111	16 TIN type	EIN			
*17 Date of birth	Unknown						
18 Contact phone number	er	4106661212	Ext.				
19 E-mail address		acs1@acs1.com					
*20 Form of identification	used to verify ic	entity Unknown					
Driver's licen:	se/State ID	Passport Alien Registration	⊠ Other Busin	ness Licsense			
Niverban MD000554444				. 0			
Number MD3322554411		Country US	ISS	suing State	MD		
21 Cash in amount for in	dividual or entity	listed in Item 4 \$	11,0	00			
	Acc	ount number 654321					
22 Cash out amount for i	ndividual or enti	ty listed in Item 4 \$					
Account number					• •		

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Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23	Date of transaction 12/19/2012						
24	Armored car (FI Contract)	_ ATM _	Mail Depos	it or Shipment	☐ Night Deposit	☐ Aggrega	ated transactions
*25	CASH IN: (in U.S. dollar equivalent)			*27 CASH OUT	: (in U.S. dollar equiv	valent)	
a	a Deposit(s) \$_	37	,500 _{.00}	a Withdrawal(s)		\$.00
k	Payment(s)		.00	b Advance(s) on	credit (including marke	rs)	.00
C	Currency received for funds transfer(s) out		.00	c Currency paid	from funds transfer(s) ir	1	.00
C	Purchase of negotiable instrument (s)		.00	d Negotiable inst	trument(s) cashed		.00
6	Currency exchange(s)		.00	e Currency excha	ange(s)		.00
f	Currency to prepaid access		.00	f Currency from	prepaid access		.00
g	Purchases of casinos chips, tokens and other gaming instruments		.00		of casino chips, tokens		.00
ŀ	Currency wager(s) including money plays		.00	h Payment(s) on and OTB or sp	wager(s) (including rac ports pool)	ee	.00
i	Bills inserted into gaming devices		.00	i Travel and com book gaming in	nplimentary expenses a ncentives	nd 	.00_
Z	Other (specify):			j Payment for to promotions	urnament, contest or ot	her	.00
_			.00	z Other (specify):			
							.00
	Total Cash in \$	37	7,500.00	Total Cash ou	t	\$.00
26	Foreign Cash in		Foreiç	gn Country			+ •
28	Foreign Cash out		Foreiç	gn Country			+ •

- 2.2. Mr. Brown receives a total of \$9,000 in currency delivered by ACS One acting on Mr. Brown's behalf. A CTR is not required as the total amount received does not exceed \$10,000.
- 2.3. Mr. Davis receives two deposits (individually in amounts exceeding \$10,000) for a total of \$23,000 in currency: \$10,500 is delivered by ACS Three acting on Mr. Davis's behalf; the balance, \$12,500, is delivered by a third party, John Smith.

Bank B will complete the CTR reflecting this transaction as follows:

- Part I (1 of 3) will show Mr. Davis's personal information, checking boxes 2c ("Person on whose behalf transaction was conducted") and 3 ("Multiple Transactions"), and inserting in item 21 the total amount deposited (\$23,000) and Mr. Davis's account number.
- Part I (2 of 3) will show ACS Three's corporate information, checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$10,500 delivered by ACS Three on Mr. Davis's behalf and Mr. Davis's account number.
- Part I (3 of 3) will show Mr. Smith's personal information, checking box 2b ("Person conducting transaction for another"), and inserting in item 21 the \$12,500 delivered by John Smith and Mr. Davis's account number.
- Part II will show the total deposits of \$23,000 in section 25a.
- Part III will contain Bank B's information as the financial institution where transaction took place.

Parts I and II of the completed CTR are shown on pages 26 through 30 of this guidance.

2.4. Mr. Edwards receives a total of \$8,600 in currency delivered by ACS Three acting on Mr. Edwards's behalf. A CTR is not required, as the total amount received does not exceed \$10,000.



Version Number: 1.2

Filing Name	ACS Multi. Trans	s. (2.3)							
*1 Type of filing		Correct/amend prior report	FinCEN directed Backfiling						
Document Control Num	Document Control Number / BSA Identifier								
Save	Validate		Print						
By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.									
		Sign with PIN							

Part I Person Involv	Part I Person Involved in Transaction 1 of 3						
*2 a Person conduction of transaction of Multiple transaction of transaction of the trans	on own behalf	b Person c transaction	onducting on for another	c 🛭 Person transact	on whose behalf ion was conducte	d d [Courier Service (private)
Check	☐ If entity						
*4 Individual's last name or entity's legal name	Unknown	Davis					
*5 First name	Unknown	William					
6 Middle name		В					
Suffix							
7 Gender							
8 Alternate Name							
9 Occupation or type of b	usiness	Real Estate Br	oker				
9a NAICS Code					5313		
*10 Address	Unknown	100 Dorsey Ha	III Drive				
*11 City	Unknown	Columbia					
*12 State	Unknown	MD *13 ZIP/Postal Code ☐ Unknown 21044					
*14 Country	Unknown		US				
*15 TIN	Unknown	258741000		16 TIN ty	pe SSN-ITIN		
*17 Date of birth	Unknown	09/20/1965					
18 Contact phone number	er	4435551212		Ext.			
19 E-mail address		william.davis@	aol.com				
*20 Form of identification	used to verify id	lentity	Unknown				
□ Driver's licent	se/State ID	Passport	Alien Registration	n			
Number 258963215741		Country	U	IS	Issuing State		MD
04 Ocali (a. 17.)	and a control of	Paradia P			-		
21 Cash in amount for in		ount number 69	\$ 8523645		23,000		+ •
22 Cash out amount for i			\$				7.0.0
	Acco	ount number					+ •

Part I Person Involved in Transaction 2 of 3						
*2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Set transaction was conducted b Multiple transactions					Courier Service (private)	
Check	☐ If entity					
*4 Individual's last name or entity's legal name	Unknown	Armored Car Service Three				
*5 First name	Unknown					
6 Middle name						
Suffix						
7 Gender						
8 Alternate Name						
9 Occupation or type of b	usiness	Armored Car Service				
9a NAICS Code			492	21		
*10 Address	Unknown	555 West Street				
*11 City	Unknown	Columbia				
*12 State	Unknown	MD *13 ZIP/Postal Code Unknown 21044				
*14 Country	Unknown	us				
*15 TIN	Unknown	477523459	16 TIN type	EIN		
*17 Date of birth	Unknown					
18 Contact phone number	er	4105551212	Ext.			
19 E-mail address		acs3@acs3.com				
*20 Form of identification	used to verify id	dentity Unknown				
Driver's licens	se/State ID	Passport Alien Registrati	on 🛭 Other Bus	iness Licsense		
Number MD45876922		Country	US Is	ssuing State	MD	
21 Cash in amount for in	dividual or entity	v listed in Item 4 \$	10,	500		
	Account number 698523645					
22 Cash out amount for i	ndividual or enti	ty listed in Item 4 \$			_	
		ount number		<u> </u>	.	

Part I Person Involved in Transaction 3 of 3							
*2 a Person conditransaction of Multiple trans	on own behalf	Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private)					
Check	If entity						
*4 Individual's last name or entity's legal name	Unknown	Smith					
*5 First name	Unknown	John					
6 Middle name		Т					
Suffix							
7 Gender		Male					
8 Alternate Name							
9 Occupation or type of b	usiness						
9a NAICS Code							
*10 Address	Unknown	789 North Avenue					
*11 City	Unknown	Columbia					
*12 State	Unknown	MD	*13 ZIP/Postal	Code Unknown	21044		
*14 Country	Unknown	US					
*15 TIN	Unknown	159151596	16 TIN type	SSN-ITIN			
*17 Date of birth	Unknown	12/10/1970					
18 Contact phone number	er		Ext.				
19 E-mail address							
*20 Form of identification	used to verify ic	lentity Unknown					
□ Driver's licens	se/State ID	Passport Alien Registration	Other				
Number 123659966		Country US	Iss	suing State	MD		
21 Cash in amount for in	dividual or entity	listed in Item 4	12,5	500			
ZI Casil III amount tof III		ount number 698523645	12,5		⊕ ⊕		
22 Cash out amount for individual or entity listed in Item 4 \$							
	Acc	ount number			• •		

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Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23	Date of transaction 12/19/2012				
24	Armored car (FI Contract)	☐ ATM ☐ Mail Depo	sit or Shipment	☐ Night Deposit	Aggregated transactions
*25	CASH IN: (in U.S. dollar equivalent)		*27 CASH OUT	⁻: (in U.S. dollar equival	ent)
a	a Deposit(s) \$_	23,000.00	a Withdrawal(s)	\$.00
k	Payment(s)	.00_	b Advance(s) on	credit (including markers)	
C	Currency received for funds transfer(s) out	.00	c Currency paid	from funds transfer(s) in	.00
c	Purchase of negotiable instrument (s)	.00	d Negotiable ins	trument(s) cashed	
e	Currency exchange(s)	.00	e Currency exch	ange(s)	.00
f	Currency to prepaid access	.00	f Currency from	prepaid access	.00
ç	Purchases of casinos chips, tokens and other gaming instruments	.00) of casino chips, tokens, nd other gaming instrument	.00
ŀ	Currency wager(s) including money plays	.00	h Payment(s) on and OTB or sp	n wager(s) (including race ports pool)	.00
i	Bills inserted into gaming devices	.00	i Travel and cor book gaming i	mplimentary expenses and incentives	.00_
Z	Other (specify):		j Payment for to promotions	ournament, contest or other	.00
_		.00	z Other (specify)	:	
	Total Cash in \$	23,000 <u>.00</u>	Total Cash ou	st \$	
26	Foreign Cash in	Fore	ign Country		+ •
28	Foreign Cash out	Fore	ign Country		+ -

2.5. Mr. Foster receives three deposits (individually in amounts below \$10,000) for a total of \$12,000 in currency; all deposits are delivered by armored car services acting on Mr. Foster's behalf: \$3,000 is delivered by ACS One, \$4,000 is delivered by ACS Two, and \$5,000 is delivered by ACS Three.

Bank B will complete the CTR reflecting this transaction as follows:

- Part I (1 of 1) will show Mr. Foster's personal information, checking boxes 2c ("Person on whose behalf transaction was conducted") and 3 ("Multiple Transactions"), and inserting in item 21 the total amount deposited (\$12,000) and Mr. Foster's account number.
- Part II will show the total deposits of \$12,000 in section 25a, checking box 24 ("Aggregated Transactions").
- Part III will contain Bank B's information as the financial institution where transaction took place.

Parts I and II of the completed CTR are shown on pages 32 through 34 of this guidance.

During the same business day, acting on behalf of Bank B's customers ACS One made total currency deliveries for \$12,000 (Case 2.2 \$9,000 and Case 2.5 \$3,000), ACS Two made total currency deliveries of \$15,500 (Case 2.1.1. \$11,500 and Case 2.5 \$4,000), and ACS Three made total currency deliveries of \$24,100 (Case 2.3 \$10,500, Case 2.4 \$8,600, and Case 2.5 \$5,000). However, Bank B's reporting obligation regarding transactions conducted by armored car services on behalf of its customers is satisfied by filing a CTR aggregated by customer. Bank B is not required to file additional, separate CTRs aggregating all armored car service deliveries/pick-ups conducted on behalf of its customers on the same business day.



Version Number: 1.2

Filing Name	ACS Aggregate	Trans. (2.5)							
*1 Type of filing	⊠ Initial report	☐ Correct/amend prior report	☐ FinCEN dire	cted Backfiling					
Document Control Num	ber / BSA Identifier								
Save	Validate		Print						
By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.									
		Sign with PIN							

Part I Person Involv	Part I Person Involved in Transaction 1 of 1						
[∠] a ☐ transaction of	transaction on own benair		c 🖂 Person on transaction	whose behalf was conducted d [Courier Service (private)		
Check	☐ If entity						
*4 Individual's last name or entity's legal name	Unknown	Foster					
*5 First name	Unknown	John					
6 Middle name		D					
Suffix			_				
7 Gender		Male					
8 Alternate Name							
9 Occupation or type of b	ousiness						
9a NAICS Code							
*10 Address	Unknown	246 West Street					
*11 City	Unknown	Laurel					
*12 State	Unknown	NE	*13 ZIP/Post	al Code 🔲 Unknown	79183		
*14 Country	Unknown	US					
*15 TIN	Unknown	663589974	16 TIN type	SSN-ITIN			
*17 Date of birth	Unknown	06/25/1970					
18 Contact phone number	er	2467891236	Ext.				
19 E-mail address		john.foster@gmail.com					
*20 Form of identification used to verify identity							
□ Driver's license/State ID □ Passport □ Alien Registration □ Other □ Other □ Driver's license/State ID □ Passport □ Alien Registration □ Other □ Driver's license/State ID □ Passport □ Alien Registration □ Other □ Driver's license/State ID □ Passport □ Alien Registration □ Other □ Driver's license/State ID □ Passport □ Alien Registration □ Other □ Driver's license/State ID □ Passport □ Alien Registration □ Other □ Driver's license/State ID □ Passport □ Alien Registration □ Other □ Driver's license/State ID □ Passport □ Alien Registration □ Other □ Driver's license/State ID □ Passport □ Alien Registration □ Other □ Driver □ Dr							
Number 5569874563		Country	US	ssuing State	NE		
21 Cash in amount for individual or entity listed in Item 4 \$ 12,000							
	-	ount number 98765321	12	,	• •		
22 Cook out arrayint for	22 Cash out amount for individual or entity listed in Item 4 \$						
ZZ Cash out amount for i		ty listed in Item 4 \$			+ •		
	ACC	ount number					

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Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23	Date of transaction 12/19/2012				
24	Armored car (FI Contract)	☐ ATM ☐ Mail Depo	osit or Shipment	☐ Night Deposit	⊠ Aggregated transactions
*25	CASH IN: (in U.S. dollar equivalent)		*27 CASH OU	T: (in U.S. dollar equival	ent)
á	a Deposit(s) \$_	12,000.00	a Withdrawal(s)	.00
ŀ	Payment(s)	.00_	b Advance(s) o	on credit (including markers)	
Ó	Currency received for funds transfer(s) out	.00	c Currency paid	d from funds transfer(s) in	.00
C	Purchase of negotiable instrument (s)	.00	d Negotiable in	strument(s) cashed	
•	Currency exchange(s)	.00	e Currency exc	hange(s)	.00
f	Currency to prepaid access	.00	f Currency from	n prepaid access	.00
ç	Purchases of casinos chips, tokens and other gaming instruments	.00		s) of casino chips, tokens, and other gaming instrumen	ts
ŀ	Currency wager(s) including money plays	.00	h Payment(s) o	on wager(s) (including race sports pool)	.00
i	Bills inserted into gaming devices	.00	i Travel and co	omplimentary expenses and incentives	.00
2	Other (specify):		j Payment for t	tournament, contest or other	00_
		.00	z Other (specify	/):	
					.00
	Total Cash in \$	12,000 <u>.00</u>	Total Cash o	out \$	
26	Foreign Cash in	Fore	eign Country		• •
28	Foreign Cash out	Fore	eign Country		+ -

- 3. Bank C Armored car service delivering on behalf of a third party for the credit of the account of a bank's customer
- 3.1. Bank C receives a \$20,000 delivery from Armored Car Service Four (ACS Four), acting on instructions from a shipper, Mexican Casa de Cambio (Casa de Cambio Reynosa), to be credited to the account of Mr. Green, the bank's customer.

Bank C will complete the CTR reporting this transaction as follows:

- Part I (1 of 3) will show Mr. Green's personal information, checking box 2c ("Person on whose behalf transaction was conducted"), and inserting in item 21 the total amount deposited (\$20,000) and Mr. Green's account number.
- Part I (2 of 3) will show ACS Four's corporate information, checking boxes 2d ("Courier service (private)") and "Check if entity," and inserting in item 21 the \$20,000 delivered by ACS Four on behalf of Casa de Cambio Reynosa and Mr. Green's account number.
- Part I (3 of 3) will show Casa de Cambio Reynosa's corporate information as an additional person on whose behalf the same \$20,000 was conducted, checking boxes 2c ("Person on whose behalf transaction was conducted") and "Check if entity," and inserting in item 21 the total amount deposited (\$20,000) and Mr. Green's account number.
- Part II will show the total deposits of \$20,000 in section 25a.
- Part III will contain Bank C's information as the financial institution where transaction took place.

The completed CTR is shown on pages 36 through 41 of this guidance.

Even though ACS Four made a currency delivery of \$20,000 acting on behalf of a person other than Bank C, no separate CTRs need to be filed on ACS Four's delivery.



Version Number: 1.2

Filing Name	ACS Del. O/B 3rd	ACS Del. O/B 3rd Pty (3.1)		
*1 Type of filing		Correct/amend prior report	FinCEN directed Backfiling	
Document Control Numl	ber / BSA Identifier			
Save	Validate		Print	
By providing my PIN	I, I acknowledge th	nat I am electronically signing	the BSA report submitted.	
		Sign with PIN		

Part I Person Involv	ved in Trans	action 1 of	3	D C			
transaction on own behalf butrans.		b Person co transaction	nducting n for another	c Person on transaction	whose behalf was conducted d [Courier Service (private)	
3 Multiple tran	If entity						
*4 Individual's last name or entity's legal name	Unknown	Green					
*5 First name	Unknown	John					
6 Middle name		0	0				
Suffix							
7 Gender							
8 Alternate Name							
9 Occupation or type of b	usiness						
9a NAICS Code							
*10 Address	Unknown	400 North Forty	,				
*11 City	Unknown	McAllen					
*12 State	Unknown		TX	*13 ZIP/Post	al Code 🔲 Unknown	79415	
*14 Country	Unknown		US				
*15 TIN	Unknown	668451236		16 TIN type	SSN-ITIN		
*17 Date of birth	Unknown	05/10/1960					
18 Contact phone number	er	2145551212		Ext.			
19 E-mail address		john.green@ms	n.com				
*20 Form of identification used to verify identity							
☑ Driver's license/State ID □ Passport □ Alien Registration □ Other □							
Number TX66554422		Country	US		ssuing State	тх	
21 Cash in amount for individual or entity listed in Item 4 Account number 2			\$ 558899	20	,000	→ •	
22 Cash out amount for i			\$			7.0.0	
Account number						• •	

Part I Person Involv	Part I Person Involved in Transaction 2 of 3					
*2 a Person conducting transaction on own behalf b Multiple transactions		b Person conducting transaction for another	c Person on w transaction v	vhose behalf was conducted d [Courier Service (private)	
Check						
*4 Individual's last name or entity's legal name	Unknown	Armored Car Service Four				
*5 First name	Unknown					
6 Middle name						
Suffix						
7 Gender						
8 Alternate Name						
9 Occupation or type of b	ousiness	Armored Car Service				
9a NAICS Code			492	1		
*10 Address	Unknown	120 West Street				
*11 City	Unknown	McAllen				
*12 State	Unknown	тх	*13 ZIP/Postal	Code Unknown	79415	
*14 Country	Unknown	US				
*15 TIN	Unknown	477253639	16 TIN type	EIN		
*17 Date of birth	Unknown					
18 Contact phone number	er	2145531212	Ext.			
19 E-mail address		acs4@acs4.com				
*20 Form of identification used to verify identity Unknown						
☐ Driver's license/State ID ☐ Passport ☐ Alien Registration ☒ Other ☐ Business Licsense						
Number TX45879622		Country	US Is	suing State	тх	
21 Cash in amount for in			20,0	000	7 \varTheta 😡	
	Account number 22558899					
22 Cash out amount for	individual or enti	ty listed in Item 4 \$				
	Acco	ount number			• •	

action 3 of 3 \oplus					
b ☐ Person conducting transaction for another c ☐ Person on whose behalf transaction for another c ☐ Person on whose behalf transaction was conducted d ☐ Courier Service (private)					
Casa de Cambio "Reynosa"					
555 Venustiano Carranza					
Reynosa					
TAM *13 ZIP/Postal Code Unknown 8805					
MX					
16 TIN type					
Ext.					
*20 Form of identification used to verify identity					
☐ Driver's license/State ID ☐ Passport ☐ Alien Registration ☐ Other ☐					
Number Country Issuing State					
21 Cash in amount for individual or entity listed in Item 4 \$					
ount number 22558899					
y listed in Item 4 \$					
ount number					

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Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23	Date of transaction 12/19/2012				
24	Armored car (FI Contract)	☐ ATM ☐ Mail Depos	sit or Shipment	☐ Night Deposit	Aggregated transactions
*25	CASH IN: (in U.S. dollar equivalent)		*27 CASH OUT	Ր: (in U.S. dollar equival	ent)
а	Deposit(s) \$_	20,000.00	a Withdrawal(s)	\$.00_
k	Payment(s)	.00	b Advance(s) on	r credit (including markers)	.00
c	Currency received for funds transfer(s) out	.00	c Currency paid	from funds transfer(s) in	
c	Purchase of negotiable instrument (s)	.00	d Negotiable ins	trument(s) cashed	.00
e	Currency exchange(s)	.00	e Currency exch	ange(s)	.00
f	Currency to prepaid access	.00	f Currency from	prepaid access	.00
g	Purchases of casinos chips, tokens and other gaming instruments	.00_) of casino chips, tokens, nd other gaming instrument	.00_
ŀ	Currency wager(s) including money plays	.00	h Payment(s) on and OTB or sp	n wager(s) (including race ports pool)	.00
i	Bills inserted into gaming devices	.00	i Travel and cor book gaming i	mplimentary expenses and incentives	.00
z	Other (specify):		j Payment for to promotions	ournament, contest or other	.00
_		.00	z Other (specify)	:	
	Total Cash in \$	20,000.00	Total Cash ou	ut \$	
26	Foreign Cash in	Forei	gn Country		+ •
28 I	Foreign Cash out	Forei	gn Country		• •

Part III Financial Institution where Transaction(s) Takes Place 1 or 1				
*37 Type of financial institution	Depository institution			
Other (specify)				
*29 Primary federal regulator	Federal Deposit Insurance Corporation (FDIC)			
38 If 37a - Casino/Card Club is c	hecked, indicate type (check only one)			
State licensed casino	Tribal authorized casino			
*30 Legal name of financial instit	ution Bank C			
31 Alternate name, e.g. trade na	me, DBA			
*32 EIN 24568888	18			
*33 Address 4500 Wa	4500 Water Court			
*34 City McAllen				
*35 State	тх			
*36 ZIP Code 79415				
39 Financial institution ID type	Research, Statistics, Supervision and Discount (RSSD) number			
ID number	951951951			
*40 Contact office	Compliance			
*41 Phone number	2145551212 Ext.			
*42 Date Filed	(Date filed will be auto-populated when the form is signed.)			