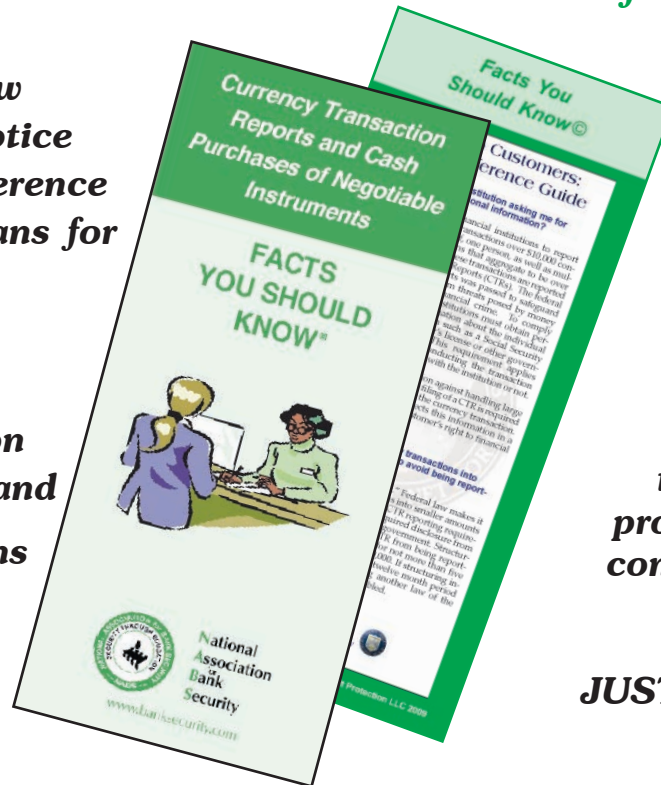


## FinCEN Pamphlet, “Notice to Customers: A CTR Reference Guide”

FinCEN has released a new educational pamphlet, “Notice to Customers: A CTR Reference Guide,” intended as a means for bank employees to:

- Communicate to customers the bank’s large currency transaction reporting requirements, and
- Help answer questions from customers who are not familiar with the bank’s obligations under the BSA.



The pamphlet that educates and protects your employees from exposure or allegations of “assisting” customers in structuring cash transactions and protects them from confrontations with customers...

**JUST GOT BETTER!**

The National Association for Bank Security and Profit Protection, LLC, now gives you a flexible way to offer this information. Your institution may provide to customers the new “Notice to Customers: A CTR Reference Guide,” or our traditional 3-panel Facts You Should Know® pamphlet, or you may provide both.

### The Bank Secrecy Act (BSA) regulations state:

**“No person shall, for the purpose of evading the reporting requirements [of the BSA], structure or assist in structuring . . . any transaction with one or more domestic financial institutions.”**

Of most concern is the phrase, “assist in structuring,” and the potential liability to both a bank and its employees when responding to a customer who asks how cash transactions over \$10,000 can be handled so that a CTR will not be filed. The concern is: How may the customer be informed of the bank’s CTR reporting responsibilities while avoiding statements which could be construed as advising (or assisting) the customer in structuring transactions in violation of the regulations?

### Avoid Liability—Use the Facts You Should Know pamphlet

Rather than a teller or other employee attempting to explain the CTR filing requirements to a customer, many banks, since 1987, have made available to their employees (especially tellers) the pamphlet, **FACTS YOU SHOULD KNOW®**. It is intended to help avoid improper discussions with customers who have questions concerning CTRs. Its primary objective is to prevent an employee from innocently offering advice which could be construed as “assisting” a customer in structuring transactions. Also includes the \$3,000 record-keeping rule for the cash sale of negotiable instruments.

### Safety Considerations — Avoid Confrontations

Furthermore, there are other related customer service considerations. In some instances valued depositors have become argumentative or irate when tellers have tried to explain the CTR reporting requirements. Thousands of financial institutions have found the **FACTS YOU SHOULD KNOW®** pamphlet beneficial for minimizing the potential for verbal confrontations with customers.

Produced by

Distributed through 32 state bankers associations



in cooperation with

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Quantity	Catalog Number		Price	TOTAL
	PB206402	<b>FACTS YOU SHOULD KNOW</b> <i>Currency Transaction Reports and Cash Purchases of Negotiable Instruments</i> Packages of 100 pamphlets	\$32.00	\$
	PB206403	<b>FACTS YOU SHOULD KNOW</b> <i>Currency Transaction Reports and Cash Purchases of Negotiable Instruments</i> Packages of 500 pamphlets	\$128.00	\$
	PB206901	<b>FinCEN</b> "Notice to Customers: A CTR Reference Guide" Packages of 100 pamphlets	\$27.80	\$
	PB206905	<b>FinCEN</b> "Notice to Customers: A CTR Reference Guide" Packages of 500 pamphlets	\$118.80	\$
	PB206922	<b>FACTS YOU SHOULD KNOW</b> <i>Currency Transaction Reports and Cash Purchases of Negotiable Instruments</i> <b>FinCEN — "Notice to Customers: A CTR Reference Guide"</b> Packages of 100 pamphlets of each	\$45.80	\$
	PB206955	<b>FACTS YOU SHOULD KNOW</b> <i>Currency Transaction Reports and Cash Purchases of Negotiable Instruments</i> <b>FinCEN — "Notice to Customers: A CTR Reference Guide"</b> Packages of 500 pamphlets of each	\$182.80	\$

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