



# The BSA Coalition

Rising to the challenge. Staying ahead of the BSA/AML curve

Virtual Town Hall

Photo by Z on Unsplash

## The How's and When's of Communicating with Law Enforcement

Thursday, November 17, 2022 | 2 pm-3:00 pm EST

# Welcome!



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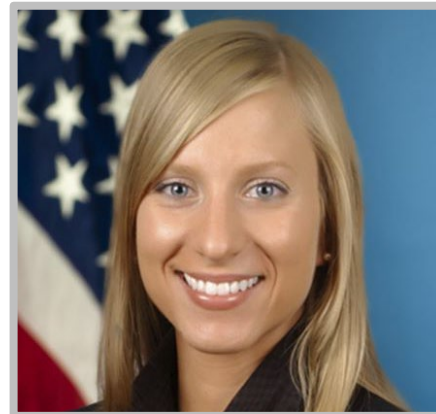


**Moderator**

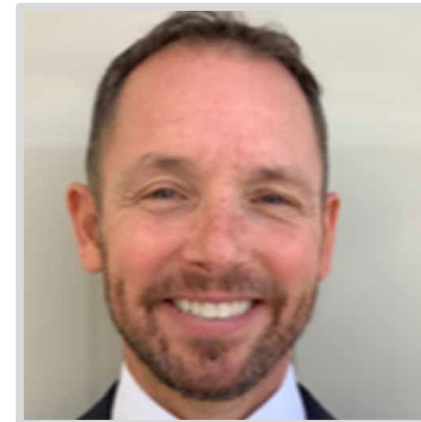
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### Town Hall Topics

The Town Hall discussion was comprised of three main topics

1. Recognizing the growing threat of scams, particularly related to those leveraging the tax season and the holiday season
2. The circumstances that may surround conversations with law enforcement prior to filing a SAR
3. The how to advise law enforcement of a particular SAR filing an institution has deemed “significant”

This deck has one slide per topic. Each slide has links to resources for the readers to review.



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### Town Hall Topic: SCAMS

The presenters reminded the audience to beware of seasonal email scams. Increasing these scams are leveraging holiday seasons to take advantage of the natural human impulse to help less fortunate persons. In addition, IRS notes many phone and email scammer disguise themselves as “agents” and attempt to extort payments and banking information.

Below are some links which represent warnings from the IRS and FBI. (Note some of these permit you to subscribe to ongoing publication.)

- <https://www.irs.gov/newsroom/tax-scams-consumer-alerts>
- <https://www.fbi.gov/how-we-can-help-you/safety-resources/scams-and-safety/common-scams-and-crimes>
- <https://www.irs.gov/newsroom/fact-sheets>



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**Town Hall Topic: BSA rules that permit discussion of SAR information and documentation with Law Enforcement, (slide 1 of 2)**

- <https://www.fincen.gov/resources/statutes-regulations/guidance/suspicious-activity-report-supporting-documentation>  
The above link provides important and comprehensive information about the “how”, “what”, and “when” financial institutions can communicate.
- [https://www.irs.gov/pub/irs-tege/itg\\_sarc\\_prep.pdf](https://www.irs.gov/pub/irs-tege/itg_sarc_prep.pdf)  
Excellent help to prepare a SAR including how to organize supporting documentation



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- <https://bsaaml.ffiec.gov/manual/AssessingComplianceWithBSARegulatoryRequirements/04>  
Note the discussion of the safe harbor protection from civil liability for all reports of suspicious transactions made to appropriate authorities, including supporting documentation, regardless of whether such reports are filed pursuant to the SAR instructions.
- <https://bsacoalition.org/webcasts/>  
A webcast (which can be streamed 24/7) which provides a very comprehensive of disclosure of customer information to law enforcement by financial institutions. View the video with the link above. A downloadable copy can be provided upon request.