

Safe Harbor Federal law (31 U.S.C. 5318(g)(3)) provides complete 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 this report's instructions or are filed on a voluntary basis. Specifically, the law provides that a financial institution, and its directors, officers, employees and agents, that make a disclosure of any possible violation of law or regulation, including in connection with the preparation of suspicious activity reports, "shall not be liable to any person under any law or regulation of the United States, any constitution, law, or regulation of any State or political subdivision of any State, or under any contract or other legally enforceable agreement (including any arbitration agreement), for such disclosure or for any failure to provide notice of such disclosure to the person who is the subject of such disclosure or any other person identified in the disclosure."

Notification Prohibited Federal law (31 U.S.C. 5318(g)(2)) provides that a financial institution, and its directors, officers, employees, and agents who, voluntarily or by means of a suspicious activity report, reports suspicious transactions to the government, may not notify any person involved in the transaction that the transaction has been reported.

In situations involving violations that require immediate attention, such as terrorist financing or ongoing money laundering schemes, the financial institution shall immediately notify by telephone an appropriate law enforcement authority in addition to filing a timely suspicious activity report.

When to file a report

1. Every broker or dealer in securities within the United States (for purposes of this section, a "broker-dealer") shall file with FinCEN, to the extent and in the manner required by 31 CFR 103.19, a report of any suspicious transaction relevant to a possible violation of law or regulation. A broker-dealer may also file with FinCEN a report of any suspicious transaction that it believes is relevant to the possible violation of any law or regulation but whose reporting is not required by 31 CFR 103.19. A voluntary filing does not relieve a broker-dealer from the responsibility of complying with any other reporting requirements imposed by the Securities and Exchange Commission or a self-regulatory organization ("SRO") (as defined in section 3(a)(26) of the Securities Exchange Act of 1934, 15 U.S.C. 78c(a)(26)).
2. A transaction requires reporting if it is conducted or attempted by, at, or through a broker-dealer, it involves or aggregates funds or other assets of at least \$5,000, and the broker-dealer knows, suspects, or has reason to suspect that the transaction (or a pattern of transactions of which the transaction is a part):
 - i. Involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity (including, without limitation, the ownership, nature, source, location, or control of such funds or assets) as part of a plan to violate or evade any federal law or regulation or to avoid any transaction reporting requirement under federal law or regulation;
 - ii. Is designed, whether through structuring or other means, to evade any requirements of 31 CFR 103 or of any other regulations promulgated under the Bank Secrecy Act, Pub. L. 91-508, as amended, codified at 12 U.S.C. 1829b, 12 U.S.C. 1951-1959, and 31 U.S.C. 5311-5332;
 - iii. Has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and the broker-dealer knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction; or
 - iv. Involves use of the broker-dealer to facilitate criminal activity.
3. The obligation to identify and properly and timely report a suspicious transaction rests with each broker-dealer involved in the transaction, provided that no more than one report is required to be filed by the broker-dealers involved in a particular transaction (so long as the report filed contains all relevant facts).
4. A SAR-SF shall be filed no later than 30 calendar days after the date of the initial detection by the reporting broker-dealer of facts that may constitute a basis for filing a SAR-SF. If no suspect is identified on the date of such initial detection, a broker-dealer may delay filing a SAR-SF for an additional 30 calendar days to identify a suspect, but in no case shall reporting be delayed more than 60 calendar days after the date of such initial detection. (continued)

In situations involving violations that require immediate attention, such as money laundering schemes, the broker-dealer shall immediately notify by telephone an appropriate law enforcement authority in addition to filing timely a SAR-SF. Broker-dealers wishing voluntarily to report suspicious transactions that may relate to terrorist activity may call FinCEN's Financial Institutions Hotline at 1-866-556-3974 in addition to filing timely a SAR-SF if required by this section. The broker-dealer may also, but is not required to, contact the Securities and Exchange Commission to report in such situations.

5. **Exceptions.** A broker-dealer is not required to file a SAR-SF to report:
- i. A robbery or burglary committed or attempted that is reported to appropriate law enforcement authorities, or for lost, missing, counterfeit, or stolen securities with respect to which the broker-dealer files a report pursuant to the reporting requirements of 17 CFR 240.17f-1;
 - ii. A violation otherwise required to be reported on a SAR-SF of any of the federal securities laws or rules of an SRO by the broker-dealer or any of its officers, directors, employees or other registered representatives, other than a violation of 17 CFR 240.17a-8 or 17 CFR 405.4, so long as such violation is appropriately reported to the SEC or an SRO.
6. The Bank Secrecy Act requires financial institutions to file currency transaction reports (CTRs) in accordance with the Department of the Treasury's implementing regulations (31 CFR Part 103). These regulations require a financial institution to file a CTR whenever a currency transaction exceeds \$10,000. If a currency transaction exceeds \$10,000 and is suspicious, the institution must file both a CTR (reporting the currency transaction) and a suspicious activity report (reporting the suspicious aspects of the transaction). If a currency transaction is \$10,000 or less and is suspicious, the institution should only file a suspicious activity report. Appropriate records must be maintained in each case.

See: 31 CFR Part 103; 17 CFR 240.17a-8; 17 CFR 405.4

General Instructions

A. Abbreviations and Definitions

1. AKA--	also known as (individual)	20. IB--	Introducing Broker-Futures
2. ASE--	American Stock Exchange	21. IRS--	Internal Revenue Service-Criminal Investigation
3. CBOE--	Chicago Board Options Exchange	22. ITIN--	Individual taxpayer ID number
4. CME--	Chicago Mercantile Exchange	23. ISID®--	International Securities ID Directory
5. CPO--	Commodity Pool Operator	24. LIFFE--	London Int. Financial Futures Exchange
6. CRD--	Central Registration Depository	25. MATIF--	Marche a Terme International de France
7. CFTC--	Commodity Futures Trading Commission	26. MCE--	Mid America Commodity Exchange
8. CSCE--	Coffie, Sugar & Cocoa Exchange	27. NASD--	National Assoc. of Securities Dealers
9. CTA--	Commodity Trading Advisor	28. NFA--	National Futures Association
10. CTN--	New York Cotton Exchange	29. NYFE--	New York Futures Exchange
11. CUSIP®--	Committee on Uniform Securities ID Procedures	30. NYM-	New York Mercantile Exchange
12. DEA--	Drug Enforcement Administration	31. NYSE-	New York Stock Exchange
13. DBA--	doing business as (entity)	32. OTC--	Over-the-counter
14. EIN--	Employer Identification Number	33. PCX--	Pacific Exchange
15. EUREX--	European Exchange	34. PHLX--	Philadelphia Stock Exchange
16. FBI--	Federal Bureau of Investigation	35. RE-futures--	Registered entity-futures
17. FCM--	Futures Commission Merchant	36. RFA--	Registered futures association
18. FINEX--	Financial Exchange	37. SEC--	Securities and Exchange Commission
19. IA--	Investment Advisor	38. SRO-	Self-Regulatory Organization- Securities
		39. SSN--	social security number

B. How to make a report:

1. Send each completed suspicious activity report to:

Detroit Computing Center
Attn: SAR-SF
P.O. Box 33980
Detroit, MI 48232

2. Leave blank any items that do not apply or for which information is unavailable.

3. Items marked with an asterisk * are considered critical and **are required to be completed if known.**
4. Complete each suspicious activity report by providing as much information as possible on initial and corrected reports.
5. Do not include supporting documentation with the suspicious activity report filed. Identify and retain a copy of the suspicious activity report and all supporting documentation (e.g. transaction records, new account information, tape recordings, e-mail messages, correspondence, etc.) or business record equivalent for your files for five (5) years from the date of the suspicious activity report. All supporting documentation must be made available to appropriate authorities upon request.
6. If more than one subject is being reported, make a copy of page 1, complete only the subject information in Part I, and attach the additional page(s) behind page 1. If more space is needed to complete any other item(s), identify that item in Part VI by "item number," and provide the additional information.
7. Type or complete the report using block written letters.
8. Enter all **dates** in MM/DD/YYYY format where MM=month, DD=day, and YYYY=year. Precede any single number with a zero, *i.e.*, 01,02, etc.
9. List all **Telephone numbers** with (area code) first and then the seven numbers, using the format, *i.e.*, (XXX) XXX-XXXX. List international telephone and fax numbers in Part VI.
10. Always enter an **individual's name** by entering the last name, first name, and middle initial (if known). If a legal entity is listed, enter its name in the last name field.
11. Enter all **identifying numbers** (alien registration, Corporate/Partnership Resolution, CRD, CUSIP,[®] driver's license/state ID, EIN, ITIN, Foreign National ID, ISID,[®] NFAID, passport, SEC, and SSN etc.) starting from left to right. Do not include spaces, dashes, or other punctuation.
12. Enter all **Post Office ZIP codes** with at least the first five numbers (all nine (ZIP + 4) if known) and listed from left to right.
13. Enter all **monetary amounts** in U.S. Dollars. Use whole dollar amounts rounded up when necessary. Use this format: \$0,000,000.00. If foreign currency is involved, state name of currency and country of origin.
14. **Addresses, general.** Enter the permanent street address, city, two letter state/territory abbreviation used by the U.S. Postal Service and ZIP code (ZIP+4 if known) of the individual or entity. A post office box number should not be used for an individual, unless no other address is available. For an individual, also enter any apartment number or suite number, road or route number. If a P.O. Box is used for an entity, enter the street name, suite number, and road or route number. If the address of the individual or entity is in a foreign country, enter the city, province or state, postal code and the name of the country. Complete any part of the address that is known, even if the entire address is not known. If from the United States, leave country box blank.

C. Specific Suspicious Activity Report Preparation Instructions

Item 1-- Type of report. Check Box , "Corrects Prior Report", if this report is filed to correct a previously filed SAR-SF. To correct a report, a new SAR must be completed in its entirety. Note corrected items in Section VI (see line"v").

PART I Subject Information

Item 2 -- Multiple Subjects. Check box (a) if multiple subjects are involved. Attach additional copy(ies) of Part I to this report. Check box (b) if subject information unavailable.

Items 3, 4, and 5--*Name of Subject. See General Instruction B10. If the organization is operated under a different trade or business name than its legal name, enter the organization's legal name in Item 3 (e.g., Smith Enterprises, Inc.) and the name of the business in Item 6 (e.g., Smith's Tours). If more than one Part I is required, make a copy of page 1 and provide the additional information.

Item 6-- also known as (AKA-individual), or doing business as (DBA-entity). If a reporting institution has knowledge of a subject's separate "AKA" and/or entity's "DBA" name, enter it in Item 6.

Item 7-- Occupation/type of business. If known, identify the occupation, profession or business that best describes the individual in Part I (e.g., attorney, car dealer, carpenter, doctor, farmer, plumber, truck driver, etc.). Do not use nondescript terms such as businessman, merchant, store owner (unless store's name is provided), self employed, unemployed, or retired unless the regular or former occupation is provided. If the individual's business activities can be described more fully, provide the additional information in Part VI. Indicate in Item 7 if "unknown."

Items 8, 9, 10, 11, and 12-- *Address. See General Instructions B12 and B14.

Item 13-- E-mail address. Enter the subject's e-mail address if available.

Item 14-- *SSN/ITIN (individual) or EIN (entity). See General Instruction B11 and definitions. If the subject named in items 3 through 6 is a U.S. Citizen or an alien with a SSN, enter his or her SSN in Item 14. If that individual is an alien who has an ITIN, enter that number. If the subject is an entity, enter the EIN.

Item 15-- *Account number(s). See General Instruction B11. Enter up to four affected account numbers in or through which the suspicious activity occurred. If no account number is affected leave item 15 blank. Check the "yes" box to indicate if the account is closed. If more than four accounts are affected, provide the additional information in Part VI.

Item 16-- Date of birth. See General Instruction B8. If an individual is named in Items 3 through 5, enter the date of birth. If the month and/or day is not available or unknown, fill in with zeros (e.g., "01/00/1969" indicates an unknown date in January, 1969).

Item 17-- *Government issued identification. See General Instruction B11. Check the appropriate box showing the type of document used to verify the subject's identity. Box "d" denotes that a corporate or partnership resolution was used to identify an entity. If you check the "Other" box "e", be sure to specify the type of document used. In box "f", list the ID number of the identifying document. In box "g", list the issuing authority.

Items 18 & 19-- Telephone numbers. See General Instruction B9. List any additional number(s) (e.g., hotel, etc.) in Part VI.

Item 20-- Institution association. Indicate whether the subject identified in Part I is, or was, associated with the reporting institution as an "associated person" as defined in section 3(a)(18) of the Securities Exchange Act of 1934 or CFTC rule 1.3(a), or is still "affiliated with" the reporting institution, as defined in the CFTC rule 4.7(a)(1)(i). If so, explain in Part VI.

PART II Suspicious Activity Information

Item 21-- *Date or date range of suspicious activity. See General Instruction B8. Enter the date of the reported activity in the "From" field. If more than one day, indicate the duration of the activity by entering the first date in the "From" field and the last date in the "To" field. If the same individual or organization conducts multiple or related activities within the 30 calendar day period after the date of initial detection, the reporting institution may consider reporting the suspicious transactions on one form but only if doing so will fully describe what has occurred. A new report must be filed for other related suspicious transactions committed after the initial detection period.

Item 22-- *Total dollar amount. See General Instruction B13. Enter the total dollar value of the funds or assets involved in the suspicious activity that is conducted by the same individual or organization within the 30 calendar day period after the date of initial detection. For multiple or related suspicious transactions, show the breakdown of this aggregated total in Part VI. For abuse by a person associated with the institution, the value of this item can be zero (0). Do not use any words, such as "thousand", "million", etc. For foreign currency, convert to U.S. Dollars.

Item 23-- Instrument type. Mark the type of instrument identified in Item 23. (Check all that apply.) In item 23b, indicate U.S. Dollars only. For item 23r, indicate currency if other than U.S. Dollars. For Item 23s, enter appropriate three or four letter code.

Items 24, 25, 26, 27, 28, and 29-- CUSIP® Numbers. Enter up to six (6) securities numbers. If more, enter additional in Part VI.

Item 30-- *Type of suspicious activity. Check the box(es) that identifies the suspicious activity. More than one box may be checked. Provide a brief explanation in Part VI of why each box is checked. If none of these items applies, mark "other" and provide in Part VI an explanation of the type of suspicious activity.

Part III Law Enforcement or Regulatory Contact Information

Items 31, 32, and 33-- Contacting enforcement authorities. If no contact, go to Part IV. See General Instructions "A" "Abbreviations and Definitions" for law enforcement and regulatory identities. If you have advised any law enforcement authority SRO, RFA, or RE-futures entity of the suspicious transactions by telephone or written communication, complete this section. If box "b" or boxes "l" through "r" are checked, provide the name of the authority contacted in Item 32. If no contact, leave Items 31-35 blank.

Item 34-- Telephone number of individual contacted. See General Instruction B9 for format.

Item 35-- Date contacted. See General Instruction B8 for format.

Part IV Reporting Financial Institution Information

Item 36-- *Name of financial institution or sole proprietorship. Enter the full legal name of the institution, *i.e.*, the name shown on the charter or other document creating the entity and registered with the SEC or CFTC. If a sole proprietor, enter the business name of the proprietorship registered with the SEC or CFTC.

Item 37-- *Employer identification number. See General Instruction B11. Enter the reporting financial institution's EIN. If sole proprietor enter SSN or ITIN.

Items *38, *39, *40, and *41-- Address. See General Instruction B14. This address should be of the principal office or headquarters in the United States.

Items 42, 43, 44, 45 and 46-- Additional address locations. See General Instruction B14. If more than one location is involved, e.g., branch office etc., provide the address of the location where the most significant portion of the suspicious transactions occurred. If more than two locations are involved check box 43 and list locations in Part VI.

Item 47-- Central Registration Depository number. See General Instruction B11. If none, leave blank.

Item 48-- SEC number. See General Instruction B11. If none, leave blank.

Item 49-- National Futures Association identification number. See General Instruction B11. If none, leave blank.

Item 50-- Dual reporting. If this is a coordinated report involving more than one individual/entity (see "When to file a report item 3") check the appropriate box and provide the details in Part VI.

Item 51-- Type of reporting institution. Check all boxes that apply to this particular report. If **none** of these categories apply to you, explain in Part VI. The Federal Bureau of Public Debt, its agents, and any other Federal agency issuers of Federal securities should mark "U.S. Government broker/dealer." State or municipal issuers of municipal securities should mark "Municipal broker/dealer." A securities SRO, RFA or RE-futures entity filing this form should identify the institution type as that of the member institution for which this report is being filed, and in **Part V**, Items 52, 53, 54, 55, 56, and 57 identify the securities SRO, RFA or RE-futures entity individual to contact.

Part V Contact for assistance

Items 52, 53, and 54-- *Contact individual. See General Instruction B10.

Item 55-- *Title/Position. Enter the job title/position of the contact individual

Item 56-- *Work telephone number. See General Instruction B9.

Item 57-- *Date report prepared. See General Instruction B8.

Part VI *Suspicious Activity Information - Narrative See page 3 for instructions.