

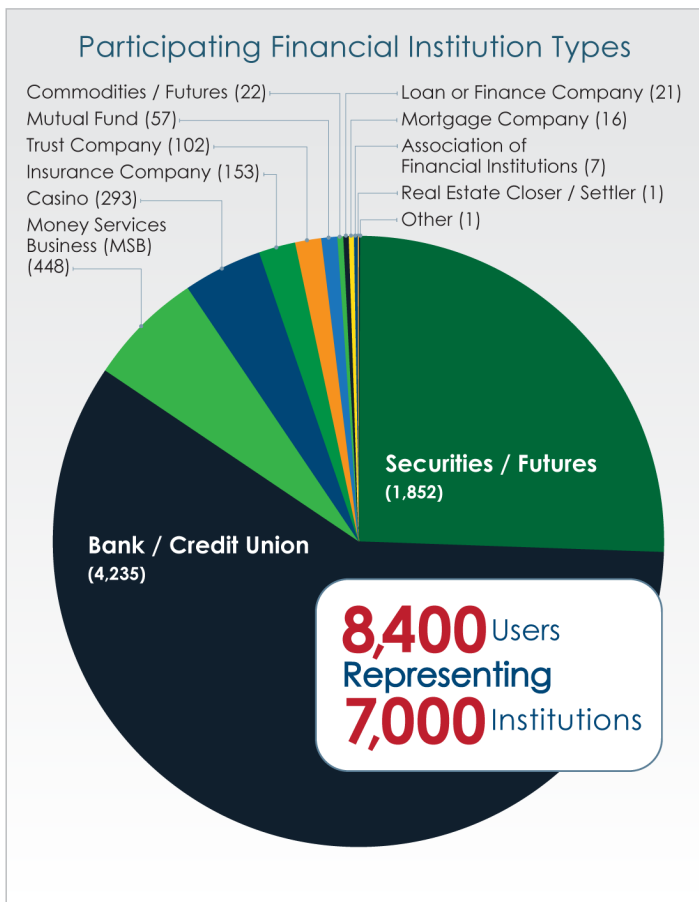


Information Sharing Insights

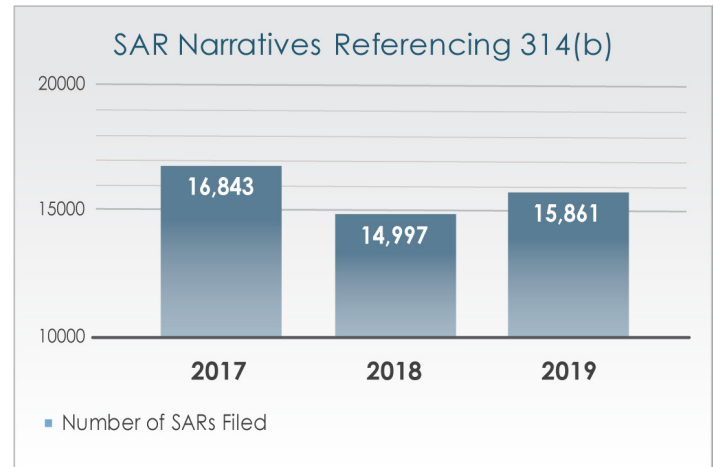
314(b) Participation and Reporting

Financial Institutions Participating in FinCEN's 314(b) Information Sharing Program

At the end of calendar year 2019, there were 8,400 users representing over 7,000 financial institutions participating in FinCEN's 314(b) information sharing program. This includes depository institutions, casinos, securities and futures firms, trust companies, insurance companies, loan or finance companies, money services businesses, mortgage companies and mutual funds.



Volume of Suspicious Activity Reports (SARs) Referencing 314(b) Narratives

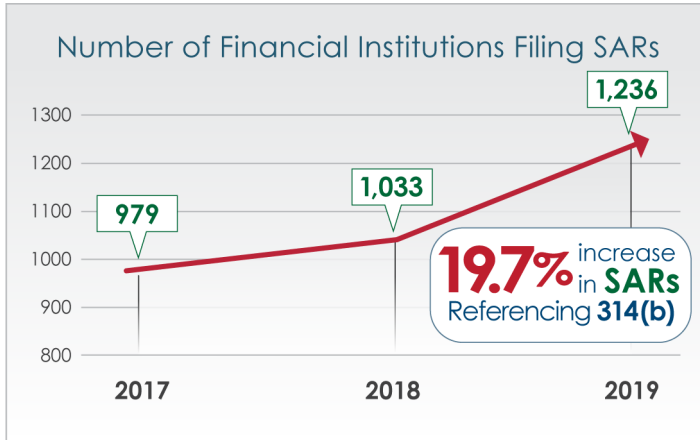


All of these SARs reference the use of 314(b) in the narrative, either as the sender or the recipient of a 314(b) request to/from another financial institution. The majority of these references fall into one of the two following broad categories:

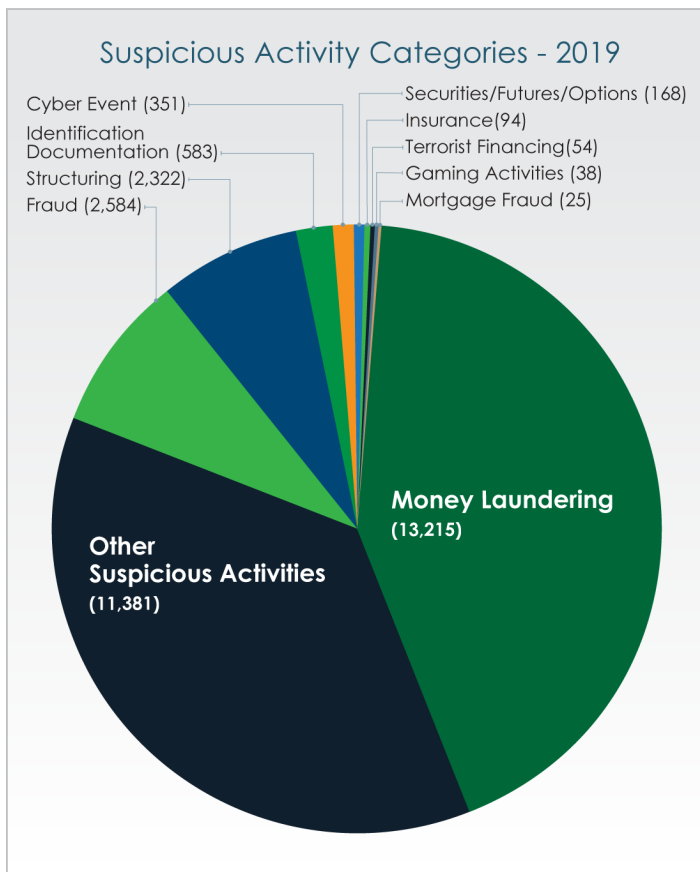
- The SAR filer sent a 314(b) request to another financial institution in support of an investigation into suspicious activity. Either the information received was used to further its investigation, ultimately contributing to the filing of the SAR, or the receiving financial institution was unresponsive and the sending financial institution filed a SAR based on their own assessment of the activity.
- The SAR filer received a 314(b) request from another financial institution. This led the receiving institution to conduct its own analysis of the subject's activity, ultimately leading to the filing of the SAR.

Number of Financial Institutions Referencing 314(b) in SAR Narratives

The number of financial institutions filing SARs referencing 314(b) in the narrative has steadily increased during the past three years, with an increase of 19.7% in 2019.



Suspicious Activity Categories Reported in SARs Referencing 314(b)



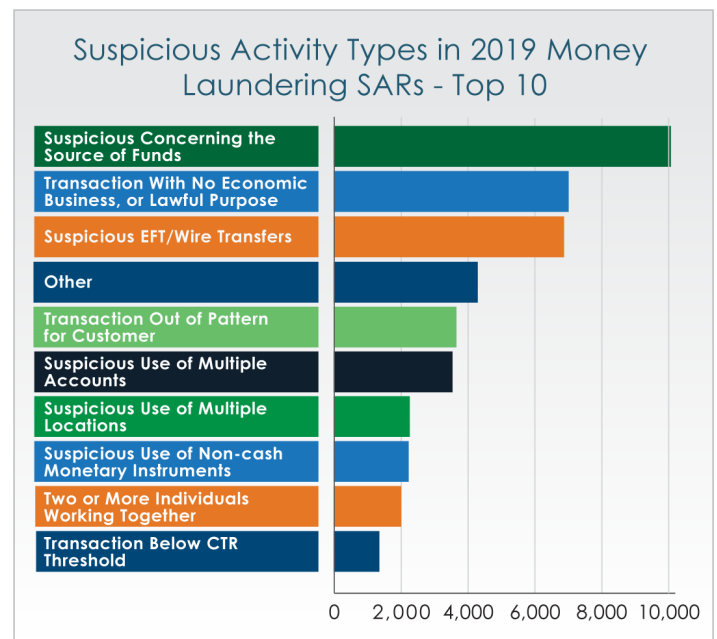
- 13,215 (83.3%) of SARs filed in 2019 referencing 314(b) indicate "Money Laundering" as a Suspicious Activity Category. Of these, 1,015 (7.7%)

indicate only "Money Laundering." The remaining 92.3% indicate at least one additional category.

- 11,381 (71.8%) of SARs filed in 2019 referencing 314(b) indicate "Other Suspicious Activities." Of the 524 of these that do not indicate at least one additional category, many relate to elder financial exploitation; transactions with no apparent economic, business, or lawful purpose; marijuana-related businesses; account takeovers; and a wide-range of other activity deemed suspicious by the filers.
- Only 50% of the 38 SARs filed in 2019 referencing 314(b) and indicating "Gaming Activities" were filed by casinos. The remaining 50% were filed by depository institutions. The "Gaming Activities" category replaced the "Casinos" category on the SAR form in 2018. There were 37 such SARs in 2018.
- The "Cyber Event" category was added to the SAR form in 2018. There were 60 SARs filed in 2018 referencing 314(b) and indicating "Cyber Event," and 351 such SARs filed in 2019.

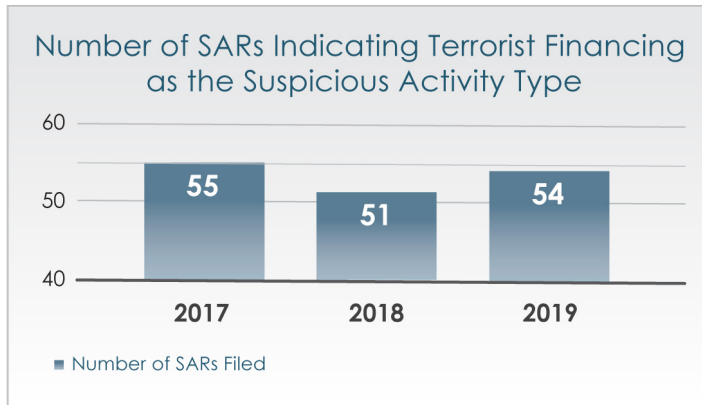
Suspicious Activity Types Within the Money Laundering Category

The majority of SARs reporting the use of the 314(b) Program in the narrative indicate money laundering as the suspicious activity category. SAR filers also have the ability to indicate a suspicious activity type, which provides additional information on the money laundering typology reported in the SAR. The below chart shows the 10 most frequently indicated suspicious activity types amongst the SARs filed in 2019 that referenced 314(b) and indicated money laundering as the suspicious activity category.



314(b) References in Terrorist Financing SARs

The number of SARs indicating terrorist financing and referencing 314(b) has remained consistent during this three-year period.



2020 Law Enforcement Awards

The FinCEN Director's Law Enforcement Awards Program recognizes the efforts of law enforcement agencies that have utilized BSA reporting to successfully pursue and prosecute criminal investigations.

Amongst the 2020 award nomination packages that FinCEN received, there were 13 SARs analyzed by law enforcement officials that specifically referenced utilization of the 314(b) Program. All of these SARs indicated that the financial institution's investigation benefitted from responsive information sharing with one or more other financial institutions.

The suspicious activities referenced in these particular SARs include trade-based money laundering schemes; firearms and ammunition-related transactions; various cryptocurrency concerns; dark web activity; drug trafficking; investment fraud; and transactions believed to involve sanctioned entities and countries.