

# Key Reporting Obligations Under the Final AML Rule

Requirement	What It Covers	Threshold/Trigger	Timeframe	Mandatory
Suspicious Activity Reports (SARs)	Reporting transactions that appear suspicious (fraud, laundering, evasion)	≥ \$5,000 and deemed suspicious	Within 30 days of detection (60 days if no suspect)	Yes
Currency Transaction Reports (CTRs)	Reporting of large cash transactions	> \$10,000 in cash per business day	Within 15 days of the transaction	Yes
Travel Rule	Recordkeeping and transmittal of originator and beneficiary info	≥ \$3,000 for transmittals of funds	At time of transmittal; must maintain records	Yes
Section 314(a) Information Sharing	Responding to law enforcement requests	Upon receipt of a FinCEN request	Must respond promptly (typically 14 days)	Yes (if contacted)
Section 314(b) Information Sharing	Voluntary sharing with other financial institutions	Participation is optional	Ongoing, if opted in	Optional, but regulated

## SAR Filing Requirements

SARs must be filed confidentially with FinCEN when suspicious activity is identified through monitoring. Advisers must maintain strict confidentiality about filed reports and implement robust detection systems to identify potential red flags in client transactions and account activity.

## CTR Compliance

CTRs apply specifically to cash transactions, not checks or wires. Multiple related transactions that together exceed \$10,000 in a single business day must be aggregated and reported. This requires systems to track cash transactions across all client accounts and business lines.

## Information Sharing Protocols

While Section 314(a) responses are mandatory when contacted by FinCEN, Section 314(b) participation is voluntary but offers safe harbor protections. Firms participating in 314(b) must register with FinCEN and ensure shared information is used only for permitted AML purposes.