**BSA REFERRAL FOR MORTGAGES**

Initial Report Continued Activity - Last Report Date:

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**PART I**

Suspect(s) Information

Name: Address: SSN or EIN: Passport #:

Work Phone: Home Phone: Date of Birth: DL State & #:

**PART 2**

Account Information

Account Owner?

Yes No If No, Explain: Account Number(s):

o

o

1:

3:

2:

4:

**PART 3**

Transaction Information

Date:

Amount:

Description: CTR Filed? Yes No Date:

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Date:

Amount:

Description: CTR Filed? Yes No Date:

o

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Date:

Amount:

Description: CTR Filed? Yes No Date:

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**PART 4**

Suspicious Activity Discussion

Report Suspicious Activity even if the bank does not take a loss

# Type of crime suspected

Occupancy fraud Income fraud Appraisal fraud Employment fraud Liability fraud

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Debt elimination schemes

Foreclosure rescue scams

Social Security Number (SSN) Fraud and other Identity Theft

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Home Equity Conversion Mortgage (HECM) Reverse mortgage scheme

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# Check the boxes of any of the following red flags involved

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Borrower/buyer submits invalid documents in order to cancel his or her mortgage obligations or to pay off his or her loan balance(s).

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Same notary public and/or other “authorized representative” preparing, signing, and sending packages of nearly identical debt elimination documents for multiple borrowers with outstanding mortgage balances.

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Same notary public and/or other “authorized representative” working with and/or receiving payments from unusually large numbers of borrowers.

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Falsification of certified checks, cashier’s checks or “non-cash item checks” drawn against a borrower/buyer’s account, rather than from the account of a financial institution.

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Borrower / buyer applies for a loan for a “primary residence “but does not reside in the new primary residence as indicated on the loan application; other individuals occupy the borrower or buyer’s new primary residence indicating the property is being used as a secondary residence or income-generating property.

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Borrower/buyer of a younger age purchases his or her “primary residence” in a senior citizen residential development.

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Borrower/buyer requests refinancing for “primary residence” when public and personal documents indicate that the borrower / buyer resides somewhere other than the address on the loan application.

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Language included in a short sale contract indicates the property could be resold promptly. This possibly illegal “flipping” may occur regard less of whether the Federal Housing Administration (FHA) has re-enacted or waived its arms-length resale regulations to FHA buyers.

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Low appraisal values, non-arms length relationships between short sale buyers and sellers, or previous fraudulent sale attempts in short-sale transactions.

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Agent of the buyer and/or seller in mortgage transaction is unlicensed.

Past misrepresentations made by borrower or buyer in attempts to secure funding, property, refinance, and or shorts-sales.

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Improper/incomplete file documentation, including borrower/buyer reluctance to provide more information and/or unfulfilled promises to provide more information.

**PART 4**

Suspicious Activity Discussion (cont)

Apparent resubmission of rejected loan application with key borrower / buyer details changed or modified from individual borrower to company/corporation. This activity may identify the same person attempting to secure a loan fraudulently through a straw-borrower or non-existent person.

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Borrower / buyer attempts to structure currency deposits / withdrawals, or otherwise to hide or disguise the true value of assets, in order to qualify for loan modification programs intended for those homeowners in financial distress.

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Request from third party affiliates on behalf of distressed homeowners to pay fees in advance of the homeowner receiving mortgage counseling, foreclosure avoidance, a loan modification, or other related services.

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Third party solicitation of distressed homeowners for purported mortgage counseling, foreclosure avoidance, loan modification, or other related services. These third parties may also claim to be associated with legitimate mortgage lenders, the U.S. government, or a U.S. government program.

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Other:

**PART 5**

Preparer Information

Name:

Work Phone: Print Name:

Date: Signature:

**PART 6**

Reviewer Information

Name:

Work Phone:

Date:

SAR Filed? Yes No Date:

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o

Print Name:

Signature:

Note: documentation or additional information may be attached to the submission to the BSA Officer.