If you are worried that your financial institution repeatedly failed to file suspicious activity reports, it can be hard to know how to describe what you saw. One transaction may be explainable. A series of similar transactions, handled the same way over months or years, may point to a broader control problem.

The goal is not to label the conduct “fraud” or assume that every suspicious transaction required a report. It is to explain the facts: what happened, how often, during what **scope and time period**, what the institution knew or should have reviewed, and what appears to have happened next. A clear account helps a reviewer assess whether the evidence suggests a **systematic failure to file** rather than an isolated judgment call.

This article offers general information, not legal advice. Bank Secrecy Act (BSA) duties and whistleblower eligibility depend on the facts, the institution, and the law in effect at the time. Do not access records you are not authorized to access or share materials that you are legally prohibited from disclosing.

Start with the pattern, not the conclusion

A useful report does not begin, “Everyone knew and nothing was done.” That statement is difficult to evaluate unless you can identify who knew what, when, and how you know. Instead, describe observable details and distinguish them from your interpretation.



For example, you might explain that a set of customers or accounts showed repeat transactions with similar features; that alerts or referrals were generated; and that, based on records you were authorized to review, the cases were repeatedly closed without an apparent SAR filing or escalation. If you do not know whether a SAR was filed, say so. SAR filing information is confidential, and the absence of a document in a system usattorneys.com you could access does not always prove that no filing occurred.

Write down a timeline the same day

As soon as it is safe and practical, write a dated timeline of what you personally observed. Record when you noticed the issue, what process or system you were using, what steps you took, and what responses you received. Keep the account factual. Mark estimates as estimates and separate what you saw firsthand from what someone else told you.

Do not take, forward, or email work documents to yourself to build a personal file. Follow applicable confidentiality rules, retention policies, and legal instructions. A lawyer can help you discuss the facts without asking you to obtain materials improperly.

What BSA duties may be relevant?

The BSA is a federal framework aimed at helping detect and deter money laundering and other financial crime. Requirements vary by institution and activity. A missed report is not automatically a legal violation: the facts, applicable rules, the institution's policies, and the quality of its decision-making all matter.

Duty or control area What it generally concerns What to describe in a pattern report SAR Reporting certain suspicious transactions when regulatory criteria are met Repeated activity, alert handling, escalation, documented rationales, and timing CTR Reporting qualifying currency transactions, generally over $10,000 in a business day, subject to applicable rules and exceptions Currency activity, aggregation issues, possible structuring indicators, and relevant processing steps CDD Customer due diligence, including understanding customer relationships and, where required, beneficial ownership and risk Whether relevant customer information was collected, updated, or considered in risk decisions AML program A risk-based program with required elements such as internal controls, independent testing, a designated compliance officer, and training Recurring control gaps, ignored escalations, inadequate testing, or ineffective remediation

SAR duties are judgment-based, but not unlimited

Financial institutions subject to SAR rules must report qualifying suspicious activity. The rules generally focus on transactions that involve suspected criminal activity, funds derived from illegal activity, attempts to evade BSA requirements, or activity with no apparent lawful purpose that is unusual for the customer and lacks a reasonable explanation. The applicable threshold and deadline depend on the institution type and circumstances.

Employees do not necessarily decide whether a SAR is filed. That decision may be made by a compliance function under the institution's procedures. Your account should therefore identify the process you observed—not assume that an employee's decision not to file was unlawful. For example: "I routed these cases to the designated review queue, saw similar alerts closed under the same rationale, and observed no documented escalation in the systems available to me."

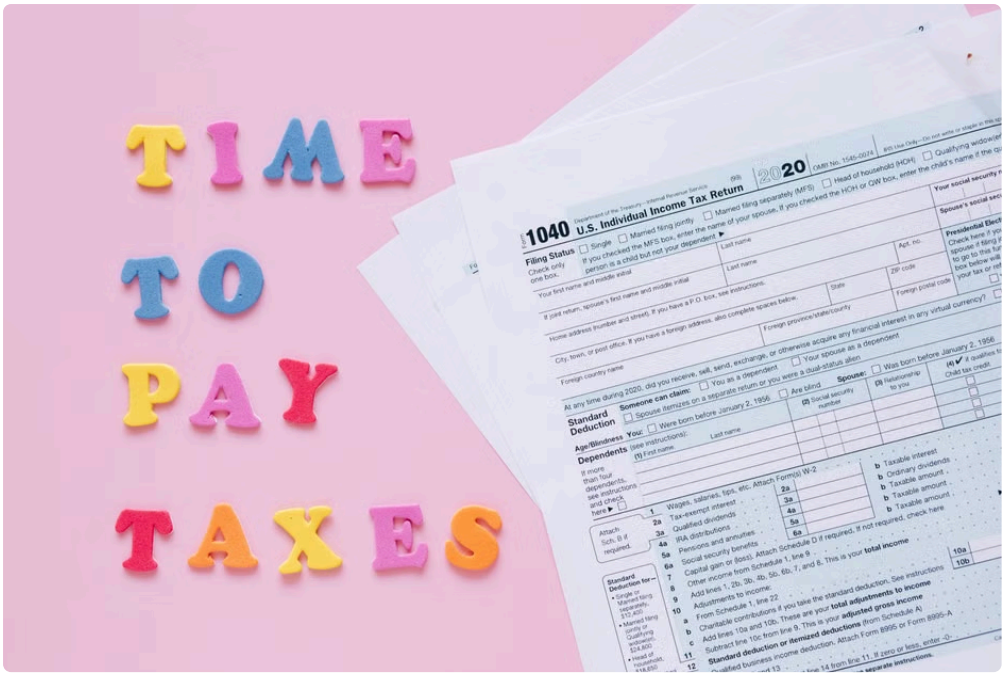
CTR, CDD, and program effectiveness can provide context

A pattern may involve more than SAR decisions. Currency transactions that meet CTR requirements, including transactions that may need to be aggregated under applicable rules, can raise separate concerns. Repeated transactions structured to evade reporting requirements may also be relevant, but do not characterize activity as structuring unless the facts support that description.

CDD and customer-risk information may help explain why a transaction pattern mattered. An institution's AML program is expected to be reasonably designed for its risks and to meet applicable requirements. Repeated failures to investigate alerts, maintain useful customer information, test controls, or correct known weaknesses may be relevant to whether the program was effective. A weak control is not automatically a reportable legal violation; explain the facts that connect the control gap to a specific duty or requirement.

What may qualify as a reportable BSA/AML violation?

Depending on the facts, potentially relevant conduct can include repeated failures to file required SARs or CTRs, inaccurate or incomplete reporting, inadequate recordkeeping, failures involving required customer due diligence, or significant deficiencies in an AML program. Supervisors or managers may also be relevant if evidence shows they directed, concealed, or knowingly allowed conduct that violated a legal obligation.



But labels are not evidence. A single SAR decision may reflect a reasonable, documented judgment even if someone disagrees with it. Conversely, repeated similar decisions may warrant closer review when they involve comparable facts, a common decision-maker or process, ignored warnings, or an instruction to suppress escalation. Describe what supports the concern and what remains uncertain.

How to explain a systematic failure to file

Organize the account so a reviewer can see the pattern without having to reconstruct it from scattered details. Focus on the elements below.

1. **Define the scope.** Identify the business line, product, branch, customer type, geography, workflow, or control team involved. Use the narrowest description you can support.
2. **Set the time period.** Give start and end dates, or clearly state that the dates are approximate. Explain why that period is meaningful—for example, when a process changed or when you observed repeated cases.
3. **Describe the repeat transactions.** Summarize similarities that matter: frequency, amounts, counterparties, transaction channels, unusual activity, or links among accounts. Avoid including unnecessary customer details in an initial narrative.
4. **Explain how the issue came to attention.** Describe alerts, case reviews, referrals, audit findings, customer information, or other signals, and how you learned about them.
5. **Trace the handling.** Explain who or what function reviewed the cases, what actions followed, and whether the same rationale or disposition appeared repeatedly. Distinguish what you saw from what you infer.
6. **Identify the apparent duty.** State why you believe SAR, CTR, CDD, recordkeeping, or AML-program requirements may be implicated. If you are not sure which rule applies, say that a qualified reviewer should assess it.

7. **Note warnings and responses.** Identify when concerns were raised through internal compliance channels, who received them by role if you know, and what response followed. Avoid speculation about motives.
8. **State limits and uncertainty.** Explain what you could not verify, including whether a SAR was actually filed. A candid limitation can make the rest of the account easier to assess.

A concise comparison can help show whether cases are genuinely alike:

Question Useful factual detail How often? Approximate number of cases or transactions, with the basis for the estimate Over what period? Specific dates or a clearly qualified range What was similar? Shared transaction features, alerts, customer-risk indicators, or review outcomes What connects them? A shared process, team, decision rule, system limitation, or management instruction, if supported

Internal reporting and external options

Many institutions have internal compliance channels for reporting concerns. If you use them, keep a private, lawful record of the date, channel, general subject, and response. Do not copy restricted records or include confidential customer information in a personal account unless you have legal guidance on how to do so.

Internal reporting may help an organization address a problem, but it is not a guarantee that the issue will be corrected or that you will be protected from workplace consequences. Whether to report internally, externally, or both is a fact-specific decision. Consider speaking with an attorney before making disclosures, especially if you handle SAR information or other protected records.

The Financial Crimes Enforcement Network (FinCEN), a bureau of the U.S. Department of the Treasury, administers BSA-related functions and has a whistleblower submission process. The FinCEN whistleblower submission form is an agency process for providing information; submitting it does not guarantee an investigation, an award, or a particular timetable. Keep your submission factual and avoid stating that you possess proof of a filing failure if you cannot verify that point.

Original information and eligibility basics

FinCEN's whistleblower framework includes eligibility rules and procedures that can depend on the type of information, how it was obtained, whether it is already known to the government, and whether legal exclusions or restrictions apply. In general, "original information" is not simply a rumor or a repetition of public allegations. It may involve independent knowledge or analysis that is derived from your own experience and is not already known to the agency from another source.

These are only basics, not a complete eligibility test. The fact that you are an employee, have reported internally, or were involved in a compliance process does not by itself establish or defeat eligibility. There may also be important limits on disclosing SARs or information that would reveal whether a SAR was filed. Get legal advice before sharing protected information or assuming that a particular submission qualifies.

Working with a whistleblower attorney

A whistleblower attorney can help you assess what you personally know, identify potentially relevant duties, preserve a lawful timeline, and choose a reporting path. They can also help separate firsthand evidence from inference and discuss confidentiality, retaliation concerns, and restrictions on records.

Some whistleblower lawyers work on a contingency-fee basis, meaning their fee is generally tied to a recovery or award under the written agreement. That does not mean every case is accepted, that an award is available, or that the client will receive a particular amount. Ask about the fee percentage, expenses, what happens if there is no recovery, and whether the lawyer represents you in agency submissions or only provides advice.

USAttorneys.com may be one place to look for attorney listings, but verify any lawyer's experience, licensing, and fit for a BSA/FinCEN matter independently. A directory listing is not an endorsement or a substitute for a consultation.

Make the account clear, careful, and credible

The strongest explanation of a suspected pattern is specific about **scope and time period**, shows how **repeat transactions** were handled, and explains why the facts may indicate a **systematic failure to file**—without claiming more than you know. Write down a timeline the same day something happens, preserve only what you are lawfully allowed to preserve, and avoid treating an internal concern as proven misconduct before it has been reviewed.

You do not need to solve the entire case yourself. Your job is to report what you observed accurately, explain the pattern, identify uncertainties, and get qualified legal advice before taking steps that could expose you or compromise protected information.