

DATE: [Insert Date]

TO: Financial Crimes Enforcement Network (FinCEN) / Relevant Regulatory Authority

FROM: [Your Institution Name]
[Compliance Department Address]
[Contact Information/Phone Number]

SUBJECT: ATTENTION: SUSPICIOUS ACTIVITY REPORT - POTENTIAL SANCTIONS EVASION

1. SUBJECT IDENTIFICATION

Name: [Individual or Entity Name]
Account Number(s): [List Account Numbers]
Tax ID/SSN: [ID Number]
Nationality/Jurisdiction: [List Country]

2. DESCRIPTION OF SUSPICIOUS ACTIVITY

This report concerns potential sanctions evasion activity identified during internal monitoring. The activity is consistent with red flags related to [Insert Specific Sanction Regime, e.g., OFAC Russian Harmful Foreign Activities Sanctions].

Key indicators observed:

- [Indicator 1: e.g., Use of complex shell companies in non-cooperative jurisdictions]
- [Indicator 2: e.g., Sudden change in beneficiary details to a non-sanctioned third party]
- [Indicator 3: e.g., Transaction patterns involving high-risk transshipment hubs]

3. TRANSACTION SUMMARY

Total Amount: [Insert Amount and Currency]
Timeframe: [Insert Start Date] to [Insert End Date]
Counterparties: [List names of originators/beneficiaries and their locations]

4. ACTION TAKEN

- [Action 1: e.g., Accounts have been restricted/frozen]
- [Action 2: e.g., Enhanced Due Diligence (EDD) performed]
- [Action 3: e.g., Relationship scheduled for termination]

5. POINT OF CONTACT

For further inquiries regarding this filing, please contact [Name of AML Officer] at [Email Address] or [Phone Number].

Sincerely,

[Signature]

[Printed Name]
[Title/Position]
[Institution Name]