MEMORANDUM FOR: Chief Executive Officers  
FROM: John F. Downey  
Director of Supervision  
SUBJECT: Revised Currency Transaction Form 4789

August 31, 1995

Attached for your information is an advance copy of the revised Currency Transaction Report (CTR) Form 4789 recently issued by the U.S. Department of the Treasury. The new CTR form becomes effective October 1, 1995. The Treasury Department advises that financial institutions are to continue using the existing CTR form until the effective date of the new form. The goal of the new form is to reduce regulatory burden on financial institutions and to increase the utilization of the form for law enforcement purposes.

We have been informed by the Financial Crimes Enforcement Network (FinCEN) of the Treasury Department that additional information and guidance on how to complete the revised CTR form is forthcoming. When that guidance becomes available, we will provide it to you.

Questions concerning the revised form should be directed to FinCEN at 1-800-949-2732 or the IRS Detroit Computing Center, Compliance Review Group at 313-226-4431. Copies of the new form can be ordered without charge by calling the IRS Forms Distribution Center at 1-800-829-3676 and following the telephonic prompts.
Form 4789
Currency Transaction Report

Part I  Person(s) Involved in Transaction(s)

Section A—Person(s) on Whose Behalf Transaction(s) is Conducted

<table>
<thead>
<tr>
<th>2</th>
<th>Individual’s last name or Organization’s name</th>
<th>3</th>
<th>First name</th>
<th>4</th>
<th>M.I.</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Doing business as (DBA)</td>
<td>6</td>
<td>SSN or EIN</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Address (number, street, and apt. or suite no.)</td>
<td>8</td>
<td>Date of birth</td>
<td>9</td>
<td>City</td>
</tr>
<tr>
<td>10</td>
<td>State</td>
<td>11</td>
<td>ZIP code</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Country (if not U.S.)</td>
<td>13</td>
<td>Occupation, profession, or business</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Part II  Amount and Type of Transaction(s). Check all boxes that apply.

<table>
<thead>
<tr>
<th>26</th>
<th>Cash</th>
<th>27</th>
<th>Bank Draft</th>
<th>28</th>
<th>Check</th>
</tr>
</thead>
<tbody>
<tr>
<td>29</td>
<td>Foreign Currency (Country)</td>
<td>30</td>
<td>Wire Transfer(s)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>Negotiable Instrument(s) Purchased</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>32</td>
<td>Negotiable Instrument(s) Issued</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>33</td>
<td>Currency Exchange(s)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>Deposit(s)/Withdrawal(s)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>35</td>
<td>Account(s) Affected (if any)</td>
<td>36</td>
<td>Other (specify)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Part III  Financial Institution Where Transaction(s) Takes Place

<table>
<thead>
<tr>
<th>37</th>
<th>Name of financial institution</th>
</tr>
</thead>
<tbody>
<tr>
<td>38</td>
<td>Address (number, street, and apt. or suite no.)</td>
</tr>
<tr>
<td>39</td>
<td>SSN or EIN</td>
</tr>
<tr>
<td>40</td>
<td>City</td>
</tr>
<tr>
<td>41</td>
<td>State</td>
</tr>
<tr>
<td>42</td>
<td>ZIP code</td>
</tr>
<tr>
<td>43</td>
<td>MICR No.</td>
</tr>
</tbody>
</table>

Sign Here

44 Title of approving official

45 Signature of approving official

46 Date of signature

47 Name or employer’s name

48 Name or employer’s name of person to contact

49 Telephone number
## Part 1  Person(s) Involved in Transaction(s)

### Section A—Person(s) on Whose Behalf Transaction(s) Is Conducted

<table>
<thead>
<tr>
<th></th>
<th>Individual’s last name or Organization’s name</th>
<th>First name</th>
<th>M.I.</th>
<th>6 SSN or EIN</th>
<th>7 Doing business as (DBA)</th>
<th>8 Date of birth 3/3/1985</th>
<th>9 Address (number, street, and apt. or suite no.)</th>
<th>10 State</th>
<th>11 ZIP code</th>
<th>12 Country</th>
<th>13 Occupation, profession, or business</th>
<th>14 If an individual, describe method used to verify identity:</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Section B—Individual(s) Conducting Transaction(s) (if other than above).

<table>
<thead>
<tr>
<th></th>
<th>Individual’s last name</th>
<th>First name</th>
<th>M.I.</th>
<th>18 SSN</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

**Advance Copy**

Not for Use Until 10-1-95

---

Please fill out the form as required.
Paperwork Reduction Act Notice.—The
information collection has been determined to be useful in criminal, tax, and regulatory
investigations and proceedings. Financial
institutions are required to provide the
information under 31 U.S.C. 5313 and 31 CFR
103. Violations of these provisions are
commonly referred to as the Bank Secrecy Act (BSA),
which is administered by the U.S. Department of the
Treasury's Financial Crimes Enforcement
Network (FinCEN).

The time needed to complete this form will
vary depending on individual circumstances. The
estimated average time is 19 minutes. If you
have any questions, suggestions, or comments
about the time estimate or suggestions for making this
form simpler, we would be happy to hear from
you. You can write to the Internal Revenue
Service, Attention: Tax Forms Committee,
PC-FP. Washington, DC 20224. DO NOT send
this form to this office, instead, see When
and Where To File below.

Suspicious Transactions
This Currency Transaction Report (CTR) should
NOT be filed for suspicious transactions
involving $10,000 or less in currency, to
note that a transaction of more than $10,000 is
suspicious. Any suspicious or unusual activity
should be reported by a financial institution in
the manner prescribed by its applicable federal
regulator or RSA. (See Item 37.) If a
transaction is suspicious and in excess of
$10,000 in currency, then both a CTR and the
appropriate referral form must be filed.

Should the suspicious activity require
immediate attention, financial institutions should
telephone 1-800-800-CTRS. An Internal Revenue
Service (IRS) employee will direct the call to the
local office of the IRS Criminal Investigation
Division (CI). CI maintains an operational Monday through Friday, from
approximate 9:00 am to 6:00 pm Eastern
Standard Time. If an emergency, consult
directory assistance for the local IRS CI office.

General Instructions
Form 4789 (Rev. October 1989) Advance
Copy.—Do not use the 1990 revision of Form 4789 to
report transactions occurring before
October 1, 1995. Use the July 1994 revision of Form 4789 to
report transactions occurring before
October 1, 1995.

Who Must File.—Each financial institution (other
than a casino, which instead must file Form
5362 and the U.S. Postal Service for which there is
an exceptions) must file Form 4789 (CTR)
for each deposit, withdrawal, exchange of
currency, or other payment or transfer, by,
through, or to the financial institution which
involves a transaction in currency of more than
$10,000. Multiple transactions must be treated
as a single transaction if the financial institution
has knowledge that (1) they are by or on behalf
of the same person, and (2) they result in either
currency received (Cash In) or currency
disbursed (Cash Out) by the financial institution
totalling more than $10,000 during any one
business day. For a bank, a business day is the
day on which transactions are routinely posted
to open accounts, as normally communicated to depository customers. For all
other financial institutions, a business day is a
calendar day.

Other financial institutions are defined as banks,
other types of depository institutions,
brokers or dealers in securities, money
transmitters, currency exchangers, check
cashers, and sellers of money orders and
currency. Should you have questions, see
the definitions in 31 CFR Part 103.

When and Where To File.—File this CTR by
the 15th calendar day after the day of the transaction
with the IRS Detroit Computing Center, ATTN:
CTR, P.O. Box 33004, Detroit, MI 48232-3004 or
with your local IRS office. Keep a copy of each CTR for
five years from the date filed.

A financial institution may apply to file
the CTRs electronically. To obtain an application
for electronic filing, contact the IRS Detroit
Computing Center, ATTN: CTR Magnetic Media
Coordinator, at the address listed above.

Identification Requirements.—All individuals
(except for those persons conducting a reportable transaction) for
whom the account or transaction is
identified by means of an official document(s).

Acceptable forms of identification include
a driver's license, passport, or another
identified card, driver's license (foreign),
non-resident alien identification card, or any
other identification document or documents,
both name and present address and
and are normally acceptable by
financial institutions as a means of identification
when cashing checks for persons other than
established customers.

Acceptable identification information obtained
previously and maintained in the financial
institution's records may be used for, for example,
if documents verifying an individual's identity
were examined and recorded on a signature
account when an account was opened, the financial
institution may rely on that information.

Completing the CTR, the financial institution
must indicate on the form the method, type, and
number of the identification. Statements such as
"know and accounts" or "signature card on file" are
not sufficient.

Penalties.—Civil and criminal penalties are
provided for failure to file a CTR or to supply
information or for filing a false or fraudulent CTR.

For purposes of this CTR, the terms below have the following meanings:

Currency.—The coin and paper money of the
United States or any other country, which is
acquired and customarily used and accepted as
money.

Person.—An individual, corporation, partnership,
trust or estate, joint stock company, association,
trustee, joint venture or other unincorporated
organization or group.

Organization.—Person other than an individual.

Transaction in Currency.—The physical
transfer of currency from one person to another.

This does not include transfer of funds by
means of check, draft, wire transfer or
other written order that does not involve
the physical transfer of currency.

Negotiable Instruments.—All checks and drafts
(including business, personal, bank, cashier's
and second-party), orders and promissory
notes. For purposes on this CTR, all traveler's
cheques shall also be considered negotiable
instruments. All such instruments shall
be considered negotiable instruments whether
or not they are in bearer form.

Specific Instructions
Because of the limited space on the front
and back of the CTR, it may be necessary to submit
additional information on attached sheets.
Submit this additional information on plain paper
attached to the CTR. Be sure to put the
individual's or organization's name and
identifying number (items 2, 3, 4, and 6 of the
CTR) on any additional sheets so that if it
becomes separated, it may be associated with the
CTR.

Submit Prior Report.—If this CTR is
being filed because it is the first prior report,
check item 1a. Staple a copy of the
original CTR to the amended one. Complete Part
II, only for any other entries which are
being amended.

Multiple Persons.—If the
transaction is being conducted by more than one
person or as a benefit of more than one
person, check item 1b. Enter information in Part I for one of the
persons and provide information on any other
person(s) on the back of the CTR.

Multiple Transactions.—If the financial
institution has knowledge that there are multiple
transactions, check item 1c.

PART I—Person(s) Involved in
Transaction(s)
Section A must be completed. If an individual
conducts a transaction on his own behalf,
complete Section A; leave Section B BLANK. If
an individual conducts a transaction on behalf of another
person(s), complete Section B for each person; leave
Section B BLANK. If an individual conducts a transaction on behalf of another person(s),
complete Section B for the individual conducting the
transaction, and complete Section A for each person
on whose behalf the transaction is
conducted of whom the financial institution has
knowledge.

Who Must File.—Each financial institution on whose behalf the
transaction(s) is conducted is an individual, put
his/her last name in item 2, first name in item 3
and middle initial in item 4. If there is a middle
initial, leave item 4 BLANK. If the transaction is
conducted on behalf of an organization, put its
name in item 2 and leave items 3 and 4 BLANK.

Doing Business As (DBA)—If the
financial institution has knowledge of a separate
doing business as' name, enter it in item 5.
For example, Johnson Enterprises DBA Pizzana.

Social Security Number (SSN) or
Employer Identification Number (EIN)
Form the SSN or EIN of the person identified in item 2.
If none, write NONE.

Entry.—Enter the permanent street address including zip code of the
person identified in item 2. Use the Post
Office's two letter state abbreviation code. A
P.O. box should not be used by itself and may
not be used if there is a street address. If a
P.O. box is used, the name of the apartment or
suite number, road or route number where the
person resides should also be provided. If the
address is outside the U.S., provide the street
address, city, province, or state, postal code (if
known), and the name of the country.

Date of Birth.—Enter the date of birth.
Six numerals must be inserted for each date.
The first two will be for the month of birth,
the second two the calendar day of birth, and
the last two the calendar year of birth. Zero (0)
should precede any single digit number.
For example, if an individual's birth date is April 3, 1948, item 9 should read 0403.

Occupation, Profession, or
Business—Identity fully the occupation,
profession, or business of the person on whose
behalf the transaction(s) was conducted. For
example, secretary, shoe salesman, carpenter,
attorney, housewife, restaurateur, liquor store, etc.
Do not use non-specific terms such as
merchant, self-employed, businessman, etc.
**Section I - Individual(s) Conducting Transaction(s) (If Other than Above).**—Financial institutions should enter as much information as is available. However, there may be instances in which items 15-25 may be left BLANK or incomplete.

If items 15-25 are left BLANK or incomplete, check one or more of the boxes provided to indicate the reason(s).

Example: If there are multiple transactions that, if only when aggregated, the financial institution has knowledge the transactions exceed the reporting threshold, and therefore, did not identify the transaction(s), check box d for Multiple Transactions.

**Items 15, 16, and 17. Individual(s) Name.**—Complete these items if an individual conducts a transaction(s) on behalf of another person. For example, if John Doe, an employee of XYZ Grocery Store makes a deposit to the store's account, XYZ Grocery Store should be identified in Section A, and John Doe should be identified in Section B.

**Items 18, 20, 21, 22, and 23. Address.**—Enter the permanent street address including the zip code of the individual. (See Items 7, 9, 10, 11, and 12.)

**Item 19. SSN.**—If the individual has an SSN, enter it in Item 19. If the individual does not have an SSN, enter NONE.

**Item 24. Date of Birth.**—Enter the individual's date of birth. See the instructions for Item 8.

**Item 25. If an Individual, Describe Method Used To Verify.**—Enter the method by which the individual's identity is verified (see General Instructions and Item 14).

**PART II - Amount and Type of Transaction(s)**

Complete Part II to identify the type of transaction(s) reported and the amount(s) involved.

**Items 26 and 27. Cash In/Cash Out.**—In the spaces provided, enter the amount of currency received (Cash In) or disbursed (Cash Out) by the financial institution. If foreign currency is exchanged, use the U.S. dollar equivalent on the day of the transaction.

If less than a full dollar amount is involved, increase that figure to the next highest dollar. For example, if the currency total is $20,000.05, show the total as $20,001.00.

**Item 28. Date of Transaction.**—Six numerals must be inserted for each date. (See Item 8.)

**Determining Whether Transactions Meet the Reporting Threshold**

Only cash transactions that, if alone or when aggregated, exceed $10,000 should be reported on the CTR. Transactions shall not be offset against one another.

If there are both Cash in and Cash Out transactions that are reportable, the amounts should be considered separately and not aggregated. However, they may be reported on a single CTR.

If there is a currency exchange, it should be aggregated separately with each of the Cash in and Cash Out totals.

**Example 1:** A person deposits $11,000 in currency to his savings account and withdraws $3,000 in currency from his checking account. The CTR should be completed as follows: Cash In $11,000 and no entry for Cash Out. This is because the $3,000 transaction does not meet the reporting threshold.

**Example 2:** A person deposits $11,000 in currency to his savings account and withdraws $12,000 in currency from his checking account. The CTR should be completed as follows: Cash In $11,000 and no entry for Cash Out. This is because there are two reportable transactions.

**Example 3:** A person deposits $6,000 in currency to his savings account and withdraws $4,000 in currency from his checking account. Further, he presents $5,000 in currency to be exchanged for the equivalent in French francs.

The CTR should be completed as follows: Cash In $11,000 and no entry for Cash Out. This is because in determining whether the transactions are reportable, the currency exchange is aggregated with each of the Cash In and the Cash Out amounts. The result is a reportable $11,000 Cash In transaction. The total Cash Out amount is $8,000 which does not meet the reporting threshold; therefore, it is not entered on the CTR.

**Example 4:** A person deposits $6,000 in currency to his savings account and withdraws $7,000 in currency from his checking account. Further, he presents $5,000 in currency to be exchanged for the equivalent in French francs.

The CTR should be completed as follows: Cash In $11,000, Cash Out $12,000. This is because in determining whether the transactions are reportable, the currency exchange is aggregated with each of the Cash In and Cash Out amounts. In this example, the Cash In and Cash Out totals each exceed $10,000 and must be reflected on the CTR.

**Item 29. Foreign Currency.**—If foreign currency is involved, check Item 29 and identify the country. If multiple foreign currencies are involved, identify the country for which the largest amount is exchanged.

**Items 30-33.**—Check the appropriate item(s) to identify the following type of transaction(s):

- Wire Transfer(s)
- Negotiable Instrument(s) Purchased
- Negotiable Instrument(s) Cashed
- Currency Exchange(s)

**Item 34. Deposits/Withdrawals.**—Check this item to identify deposits to or withdrawals from accounts, e.g., demand deposits, savings accounts, time deposits, mutual fund accounts or any other account held at a financial institution. Enter the account number(s) in Item 35.

**Item 35. Account Numbers Affected (if any).**—Enter the account number(s) of any accounts affected by the transaction(s) that are maintained at the financial institution conducting the transactions. If necessary, use additional sheets of paper to indicate all of the affected accounts.

**Example 1:** If a person cashes a check drawn on an account held at a financial institution, the CTR should be completed as follows:

Indicate Negotiable Instrument(s) Cashed and provide the account number of the check.

If the transaction does not affect an account, make no entry.

**Example 2:** A person cashes a check drawn on another financial institution. In this instance, Negotiable Instrument(s) Cashed should be indicated, but no account at the financial institution has been affected. Therefore, Item 35 should be left BLANK.

**Item 36. Other (specify).**—If a transaction is not identified in Items 30-34, check Item 36 and provide an additional description. For example, a person presents a check to purchase "foreign currency."

**PART III - Financial Institution Where Transaction(s) Takes Place**

**Item 37. Name of Financial Institution and Identity of Federal Regulator or BSA Examiner.**—Enter the financial institution's full legal name and identify the federal regulator or BSA examiner, using the following codes:

- **FEDERAL REGULATOR**
  - Federal Deposit Insurance Corporation (FDIC)
  - Federal Reserve System (FRS)
  - Office of Thrift Supervision (OTS)

- **BSA EXAMINER**
  - National Credit Union Association (NCUA)
  - Securities and Exchange Commission (SEC)
  - Internal Revenue Service (IRS)
  - U.S. Postal Service (USPS)

**Items 38, 40, 41, and 42. Address.**—Enter the street address, city, state, and ZIP code of the financial institution where the transaction occurred. If there are multiple transactions, provide information on the office or branch where any one of the transactions occurred.

**Item 39. EIN/SSN.**—Enter the financial institution's EIN. If the financial institution does not have an EIN, enter the SSN of the financial institution's beneficial owner.

**Item 43. MICR Number.**—If a depository institution, enter the Magnetic Ink Character Recognition (MICR) number.

**Signature**

**Item 44 and 45. Title and Signature of Approving Official.**—The official who reviews and approves the CTR must indicate his/her title and sign the CTR.

**Item 46. Date the Form Was Signed.**—The approving official must enter the date the CTR is signed.

**Item 47. Preparer's Name.**—Type or print the full name of the individual preparing the CTR. The preparer and the approving official may not necessarily be the same individual.

**Items 48 and 49. Contact Person/Telephone Number.**—Type or print the name and telephone number of an individual to contact concerning questions about the CTR.