If you believe your bank is ignoring suspicious activity or discouraging staff from filing reports, it is reasonable to ask whether that conduct violates the Bank Secrecy Act (BSA). The short answer is: it might, but the facts matter. A missed or delayed suspicious activity report (SAR) can raise serious compliance concerns. A disagreement about whether a particular transaction meets the filing standard does not, by itself, prove a violation.

This guide explains the basics of SAR duties, other BSA obligations, what may qualify as a reportable violation, and options for raising concerns. It is general information, not legal advice. If you work at a financial institution, be especially careful about SAR confidentiality and customer information.

What Does “Suppressing SARs” Mean?

People use “suppressing SARs” to describe different situations. It might mean a manager directed staff not to escalate suspicious activity, a bank repeatedly rejected referrals without meaningful review, or a reporting process was designed to keep potentially reportable activity from reaching the BSA officer. Those facts deserve attention, but the label alone does not establish a legal violation.

The central question is whether the bank failed to meet a BSA duty. Banks generally must file a SAR when they know, suspect, or have reason to suspect that a transaction involves funds from illegal activity, is designed to evade BSA requirements, lacks an apparent lawful purpose after review, or involves use of the bank to facilitate criminal activity. The rules apply when the relevant criteria and thresholds are met; they do not require a SAR for every unusual transaction.

“Everyone knows” that a customer is suspicious is not evidence by itself. A useful report ties concerns to specific facts: dates, transactions, accounts, explanations given, escalation steps, and the response. Write down a factual timeline the same day something happens, while your memory is fresh.



Core BSA Duties Banks Must Address

Duty Plain-English description Why it may matter SAR filing Reporting certain suspicious transactions to the government under applicable rules. A repeated failure to identify, investigate, or report qualifying activity may indicate a control breakdown. CTR filing Reporting covered cash transactions over $10,000, subject to rules on aggregation and exemptions. Breaking transactions into smaller amounts to evade reporting can be

a warning sign; missing required CTRs may raise compliance concerns. Customer due diligence (CDD) Understanding customer relationships and, where required, identifying beneficial owners of certain legal-entity customers. Weak or outdated customer information can undermine risk assessments and monitoring. AML program Maintaining a risk-based program with appropriate controls, oversight, testing, and training. An AML compliance breakdown may affect more than one customer or transaction.

SAR rules and filing timelines

For many covered institutions, the general SAR deadline is 30 calendar days after the initial detection of facts that may constitute a basis for filing. If no suspect is identified, the institution may have up to 60 days. The applicable rule and triggering event depend on the institution and circumstances. A late filing may be a concern, but a deadline question should be assessed against the governing rule, the bank's review process, and the facts.

Suspicious activity report rules also include confidentiality protections. A bank generally may not disclose a SAR or reveal its existence to the person involved in the reported activity, subject to legal exceptions. Do not forward, copy, or discuss a SAR—or confirm that one exists—without advice from qualified counsel. Do not take customer records or internal documents you are not authorized to possess.

CTR, CDD, and AML program effectiveness

CTR requirements generally cover cash transactions exceeding $10,000 in a business day, with aggregation rules and specified exemptions. A bank's failure to file a required CTR can raise BSA concerns, just as a pattern of structuring-related activity that is not properly reviewed may warrant scrutiny. But a CTR issue and a SAR issue are different; one does not automatically prove the other.

CDD helps a bank understand who its customers are, the nature and purpose of relationships, and whether activity fits the bank's understanding of the customer. For certain legal-entity customers, rules also require identifying beneficial owners. CDD information supports ongoing risk assessment; it is not a guarantee that a bank will detect every crime.

A BSA/AML program is generally expected to include internal controls, independent testing, a designated BSA compliance officer, and training. It must be appropriate to the institution's risks. Weak monitoring systems, insufficient staffing, ignored alerts, or repeated overrides may point to an AML compliance breakdown. However, a program can have shortcomings without every shortcoming being a separate BSA violation. The size, duration, effect, and management response matter.

What May Qualify as a Reportable BSA/AML Violation?

A credible concern usually connects conduct to a specific legal or regulatory obligation, rather than using "fraud" as a catch-all. Potentially significant facts may include:

- Written or repeated instructions to avoid escalating activity that appears to meet SAR criteria.
- Evidence that alerts or referrals were closed without the review required by policy or applicable rules.
- Repeated missed SARs, CTRs, or required recordkeeping across similar transactions or business lines.
- Management interference with the BSA officer's ability to perform the role or with independent testing.
- Known control failures that remain uncorrected despite audits, examinations, or internal warnings.
- Records suggesting monitoring thresholds were intentionally changed to avoid review or reporting.

These are examples, not a checklist that proves a violation. A bank may have a documented, reasonable basis for deciding that a transaction does not require a SAR. A single disputed decision may reflect judgment, incomplete information, or a process error. A pattern, concealment, retaliation, or deliberate obstruction may change the analysis.

Also distinguish a legal reporting duty from internal policy. A breach of policy can be important evidence, but not every policy violation is automatically a BSA violation. A lawyer can help identify which facts relate to a legal duty and which are operational or employment issues.

How to Raise a Concern Safely

1. Make a factual timeline

Record dates, participants, what you personally observed, what you were told, and what happened next. Separate firsthand knowledge from assumptions or information you heard from others. Note where supporting records are maintained, but do not remove, alter, or send restricted documents to a personal account. Emailing work documents to yourself can create security, confidentiality, and legal problems.



2. Consider internal compliance channels

Internal compliance channels may include the BSA officer, an ethics line, compliance leadership, internal audit, or an established escalation process. Follow applicable policies and avoid sharing SAR information with people who are not authorized to receive it. If your concern involves the usattorneys.com normal reporting chain, consider whether another approved channel is available.

Keep a record of when you raised the concern and the response, consistent with workplace rules. Do not conduct your own investigation by accessing accounts, systems, or files outside your authorization. If you fear retaliation or are unsure what you may disclose, get legal advice before taking action.

3. Understand the agency route

The Financial Crimes Enforcement Network (FinCEN), a bureau of the U.S. Department of the Treasury, administers key BSA functions and receives information through official processes. The FinCEN

whistleblower submission form is an agency process for submitting information; using it does not guarantee an investigation, an award, or a particular timeline. Other agencies, including a bank's prudential regulator or law enforcement, may have roles depending on the institution and conduct.

Before submitting information, review the current instructions on the relevant agency's official website. Be accurate and specific. Do not include a SAR or disclose its existence unless counsel has confirmed that the disclosure is permitted. A whistleblower submission is different from filing a SAR on behalf of a bank.

Original Information and Eligibility Basics

Whistleblower award eligibility is not automatic. In general, a potential claimant should have original information—such as firsthand, nonpublic information or independent analysis that meaningfully adds to what the government knows—and provide it through the process required by the applicable program. The information generally needs to lead to a successful enforcement outcome that meets statutory conditions before an award can be considered.

Eligibility can depend on the source and timing of the information, the person's role, what was already known to the government, cooperation, and other legal requirements. Some individuals may be excluded or face limits under the law. An internal report alone does not necessarily satisfy an agency program's submission requirements. Check current FinCEN materials and consult a lawyer about your specific circumstances; program rules can change.

Working With a Whistleblower Attorney

A lawyer experienced in whistleblower matters and financial regulation can help you assess whether the facts point to a BSA duty, plan a lawful report, protect confidential information, and understand workplace risks. The lawyer can also help distinguish a potential BSA violation from a policy dispute or an employment claim. You do not need to prove the entire case before seeking advice, but concrete facts make the conversation more useful.

Some whistleblower attorneys work on contingency, meaning their fee depends on the terms of a written agreement and may be tied to a recovery or award. Not every matter qualifies, and a contingency arrangement does not mean the attorney can promise an award or control how quickly the government acts. Ask about expenses, fee percentages, who pays costs if there is no award, confidentiality, and whether the lawyer represents you personally or another party.

USAttorneys.com may be one place to look for legal professionals, but verify each lawyer's licensing, experience, and fit for a BSA or whistleblower matter. A directory is not a substitute for checking credentials and discussing your situation directly.

Practical Takeaway

A bank's failure to file a SAR can be a BSA concern, but "my bank is suppressing SARs" is a conclusion that needs factual support. Focus on specific conduct, the reporting duty involved, and whether the problem appears isolated or systemic. Preserve a same-day timeline, use authorized reporting routes, protect SAR confidentiality, and do not take documents you are not allowed to access.

If you believe management is deliberately blocking required reporting, consider speaking promptly with a whistleblower attorney before making an external disclosure. A careful, accurate report is more useful—and safer—than a broad accusation unsupported by records or firsthand facts.