

BSA TRAINING PRESENTATION
CASE STUDIES – SKITS
By LaReta Lowther

When you read through these, you'll see that each of the skits closes with a "*What happens now?*" type of discussion point where the facilitator would lead the group in the discussion of the appropriate application of the BSA rules.

One caveat: These were done prior to the change in rules for BSA exemptions. I've re-read the script for that one, and while the general premise still works, you may want to re-word some of the language referring to a bank "list".

Hope they prove useful.... staff training is really one of my favorite things to do (I even did my college thesis on training the adult learner) and even compliance training can be made fun!

CASE STUDY #1

“The Loan Arranger”

CHARACTERS:

Carl Customer - Long-time customer of the bank.
Larry Loan Officer – Senior Loan Officer of the bank.
Tina Teller – Bank Teller.

SETTING:

Carl Customer was a long-time customer of the bank who borrowed money frequently and kept a sizeable amount on deposit. He didn't have much patience for formalities and paperwork and would prefer for banking to return to a promise and a handshake.

One day, when he was visiting with Larry Loan Officer, he mentioned that he was going down to the lobby to withdraw \$10,500 from his account to take to a farm equipment auction where cash payments were required.

We join Mr. Customer in the lobby.....

(Carl Customer walks up to the teller window.... Tina Teller greets him...)

Carl: “Well, missy, I need to withdraw \$10, 500 in cash from my savings account. And I want that in large bills. Make that in hundreds. Going to try and buy me a new tractor at the auction today.”

Tina Teller: “Do you have your savings account record, sir? I need to obtain the account number.”

Carl: “Well, of course I don't have my passbook. They wouldn't let me have a little book anymore when I changed the account over when the missus died. They made me take a STATEMENT savings account or something... (mumble mumble....) No place to write down my interest or anything... (more mumbling). They gave me this little card instead... got it right here in my wallet. *(takes card out of wallet and hands it to Tina Teller)*.”

Tina Teller: *(Looking at savings identification card)* “Thank you, Mr. Customer. This is what I'll need to begin to process your transaction. However, I will need some additional information. Because you are withdrawing in excess of \$10,000 in cash, I will need to obtain some additional information from you to complete a Currency Transaction Report, which is a form required by law for all transactions in excess of \$10,000. First of all... I will need.... “

Carl: *(Interrupting)* “Just wait a minute missy! I'm in a hurry! This is the last thing I wanted... more paperwork and delay! Do you know how much money I have in this bank??? Why I ought to....”

ENTER Larry Loan Officer... who has been standing in the lobby and overheard the commotion. He goes over to the teller window.

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Larry: “Why Carl, what seems to be the problem?”

Carl: “ I told you earlier, Larry, that I was going to withdraw \$10,500 in cash to take to the auction to bid on that tractor. Now it seems that I can't even withdraw my own money without filling out a government form! What kind of operation are you running here?? Isn't there some way to get around this??”

Tina: “A Currency Transaction Report is required for this transaction, Larry. It is over the reporting threshold.”

Larry: (Waving Tina off... and beaming at Carl) “Now Carl, just withdraw \$500 less, then no report will be required.”

Larry and Carl shake hands. **Tina** looks exasperated.

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CASE STUDY #2 “IS THE CUSTOMER ALWAYS RIGHT?”

CHARACTERS:

Brenda Borrower – Bank Loan Customer
Tammy Teller – Bank Teller

(Brenda Borrower walks up to the teller window. Tammy Teller smiles and greets her by name.)

Tammy Teller: “Hello Brenda. Nice to see you.”

Brenda Borrower: “Hello Tammy. Not very busy today, huh?”

Tammy Teller: “Not too bad yet...just wait until I try to go to lunch, though! What can I do for you today?”

Brenda Borrower: “I’d like to pay off my mortgage loan. Here is the pay off coupon I received in the loan department. I was just there. The amount I owe is \$11,255.67.”

Tammy Teller: (looks at coupon). “Everything appears to be in order. How will you be paying today, Brenda?”

Brenda Borrower: (takes cash from her purse) “Oh, with cash. I just withdrew the funds from my savings account at the Credit Union. I’m sure you’ve heard that the plant is cutting back some workers. I was laid off yesterday.”

Tammy Teller: (takes cash and begins counting) “Oh Brenda, I’m sorry to hear that.”

Brenda Borrower: “Thanks, Tammy. I decided to go ahead and pay my house off... I didn’t want the added worry of making my house payment.”

Tammy Teller: “That’s understandable. (takes out CTR) Because you’re paying in cash today, and the transaction is more than \$10,000, I will need to request some additional information. Federal law requires the bank to complete a currency transaction report for all cash transactions in excess of \$10,000.”

Brenda Borrower: “Oh... I know all about that government form. The Credit Union had to complete one when I withdrew the money from my savings. They take forever! And besides, I used to be a bank teller. Because a form was already completed, you don’t have to complete another report. After all, it’s the same money.”

WOW? REALLY?

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CASE STUDY #3 “TO EXEMPT OR NOT TO EXEMPT, THAT IS THE QUESTION!”

CHARACTERS:

Mr. Cash – Commercial Depositor – Owner of a local beverage wholesale establishment.

Helga – Head Teller

Helga: (Cheerily) “Greetings Mr. Cash. You’re early today.”

Mr. Cash: (Sets money bag on counter) “Yes, I only hit five of the seven red lights coming through town today.”

Helga: (Begins to open deposit an count money...and laughing) “That’s good news...traffic is such a bear anymore. Wow.. this is another big deposit. You’ve had really large deposits all this week.”

Mr. Cash: “I know. We’ve started supplying several bars in the area. They do most of their business by cash, you know. I really don’t like the idea of my drivers carrying around so much cash, either. I guess it’s a necessary evil.”

Helga: “Speaking of necessary evil.... I come up with \$12,000 even today.... Same as what you came up with on your deposit ticket. That means I have to complete a Currency Transaction Report again for your deposit.”

Mr. Cash: “Helga, that’s the third time this week and about the tenth time this month we’ve had to complete that report. My other business account, you know, the one for the convenience store I own with my brother, is on some sort of list the bank keeps. You don’t have to complete those reports for that account. Since my cash deposits for this account will be larger now, I think you should exempt this account too.”

Helga: “You know, Mr. Cash. You’re right. We have exempted your other accounts. And now, the levels of cash you are depositing in this account are consistently over \$10,000 now. You DO qualify for an exemption. I’ll add you to the bank’s list today. And we won’t be needing this (dramatically tears up the CTR)”

EVERYONE LIVES HAPPILY EVER AFTER.... OR DO THEY?

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CASE STUDY #4 “If It Walks Like a Duck, and Talks Like a Duck....”

CHARACTERS:

Wanda Waitress – Bank Customer
Sam Seedy – Wanda’s Unemployed Boyfriend
Trudy Teller – Bank Teller
Sally Super – Teller Supervisor

(Wanda and Sam walk up to the teller window...)

Wanda: “I need to go into my safe deposit box. My name is Wanda Waitress, and it’s Box 1152.”

Trudy: “Certainly, Ms. Waitress. I remember you. I let you in to the safe deposit area yesterday.”

Wanda: “Oh yeah. I remember. Where do I sign?”

Trudy: (takes out SDB card, validates the time and date of entry....hands to Wanda to sign) “Please sign where I have encoded the date and time of your entry.”

Wanda signs, hands Trudy back the card.

Trudy: “Please follow me to the safe deposit area.”

Wanda, Sam and Trudy go off. Moments later, Trudy returns to her teller window Moments later, Wanda and Sam return carrying a large bundle of cash.

Wanda: “Here. I want to deposit \$9,500 into my checking account.”

Trudy: “Certainly. I need to verify the cash.” (begins counting cash). That’s \$9,500. (processes transaction on machine). Here’s your receipt. Thank you. You know, Ms. Waitress, that’s a large sum of money... and I remember you’ve had similar sums over the past few days. Could I interest you in a few of our other deposit accounts that pay interest?”

Wanda: (grabs receipt). “No, no, no. I don’t have time for that. Thanks.”

Wanda and Sam leave.

Trudy: “Sally, could you come over here?”

Sally: “Yes, Trudy?”

Trudy: "I have a funny feeling about the customer I just waited on. For the past three days, she's entered her safe deposit box, and each time, immediately afterwards, she's deposited a large sum of cash to her checking account – each time between \$9500 and \$9900. Here are the records. The amounts are always less than \$10,001, so I don't have to file a CTR, but something just doesn't seem consistent."

Sally: "Isn't she the waitress at Joe's Pub down the street?"

Trudy: "Yes"

Sally: "Does she have another job that might explain the cash?"

Trudy: "No, to my knowledge she works only as a waitress."

Sally: "What about her husband that was with her?"

Trudy: "It's her boyfriend. And... well... (hesitating)... the word is around here is that he's involved in some unsavory activities."

Sally: "Oh..."

Trudy: "What should we do??"

WHAT SHOULD THEY DO?