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**From:** Niall Twomey [Niall.Twomey@ILCUSYS.ORG]  
**Sent:** Tuesday, April 18, 2006 4:14 PM  
**To:** Comments, Regulation  
**Cc:** Niall Twomey  
**Subject:** FinCEN-SAR4-06/OMB 3133-0094

**Illinois Credit Union League**

P.O. Box 3107  
Naperville, Illinois 60566-7107  
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April 18, 2006

*VIA Electronic Mail*

Financial Crimes Enforcement Network  
P.O. Box 39  
Vienna, VA 22183  
e-mail [regcomments@fincen.treas.gov](mailto:regcomments@fincen.treas.gov)

ATTN: 1506-0001, Revised Suspicious Activity Report by Depository Institutions  
OMB #3133-0094

We are pleased to respond on behalf of our member credit unions to the Financial Crimes Enforcement Network's request for comment on the proposed revisions to the current Suspicious Activity Report (SAR). The Illinois Credit Union League represents over 400 credit unions in Illinois.

Having reviewed each of the proposed changes that the "Agencies" are soliciting comments on, we are in support of the SAR revisions. Although the revisions are simple, they will be helpful to financial institutions in situations where there is more than one subject (formerly suspect) involved in a suspicious transaction and also when multiple financial institutions are involved in the same suspicious activity due to a common member/customer. Beyond the above two items addressed, and two other items added, the other changes consisted of rearranging existing line items, which will not have a significant impact on the procedure adhered to currently, by a financial institution, when filing an SAR.

We appreciate the opportunity to provide our comments on the Financial Crime Enforcement Network's request for comment on the proposed revisions to the current Suspicious Activity Report. We will be happy to respond to any questions regarding these comments.

Very truly yours,

ILLINOIS CREDIT UNION LEAGUE

By: \_\_\_\_\_  
Niall K. Twomey

Technical Specialist

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