**Policy 10010: Records Retention Table 10: Security Records**

**Model Policy Revised Date: 2/28/2025**

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| **RECORD** | **TERM** | **AUTHORITY** |
| Record of robberies, burglaries and non-employee larcenies attempted or committed  | Permanent  | GAAP |
| Declaration of Forgery  | 6 years  | GAAP |
| Suspicious Activity Reports and supporting documentation  | 5 years after report filed  | 31 CFR Chapter X |
| Currency Transaction Reports (Form 104)  | 5 years  | 31 CFR Chapter X |
| Blocked property, accounts and transferred funds report  | 10 years after unblocked  | 31 CFR Chapter X |
| OFAC Annual Comprehensive Report (Form TDF 90-22.50  | 10 years  | 31 CFR Chapter X |
| Annual Report of Blocked Property  | 10 years  | 31 CFR Chapter X |
| Customer Identification program (including verification of beneficial owners for legal entities) records of discrepancies in identification information and resolution methods and results | 5 years after record is made  | 31 CFR Chapter X |
| Legal entity beneficial owner identification records | 5 years after the date the account is closed | 31 CFR Chapter X (1010.230(i)) |
| Legal entity consent for accessing information from the FinCEN database | 5 years after it is last relied upon | 31 CFR Chapter X (1010.955) |
| Exemption Master List (Bank Security Act Reporting)  | 5 years after most recent change is made  | 31 CFR Chapter X |
| Exemption Statement (Bank Security Act Reporting)  | 5 years after most recent change is made  | 31 CFR Chapter X |
| International Transportation Report (Form 4790)  | 5 years  | 31 CFR Chapter X |