BSA: 9098080980980

**Filing Information**

|  |  |
| --- | --- |
| **Type of Report** | Initial Report |
| **Filing Date** | 21/07/2019 |
| **Received Date** | 20/07/2019 |
| **Entry Date** | 21/07/2019 |
| **Submission Method** | Electronic discrete filing |

**Subject Information**

|  |
| --- |
| Subject 1 of 2: HUERTAS, Jimena |
| **Role** | Subject |
| **Subject Type** | Business owner |
| **Individual/Organization** | Individual |
| **No Known Acct. Involved** | Yes |
| **Last (or Entity) Name** | HUERTAS |
| HUERTAS - Enhanced |
| **First Name** | JIMENA |
| JIMENA - Enhanced |
| **Middle Name** | MARIA |
| MARIA - Enhanced |
| **Gender Type** | Female |
| **Date of Birth** | 10/26/1986 |
| **SSN/ITIN** | 001-02-1234  |
| **Form(s) of Identification** | **Identification Type** | Driver's license/State ID |
| **Identification Number** | 9874563 |
| **Other Issuing State** | AZ |
| **Other Issuing Country** | US |
| **Address(es)** | **Street Address** | 240 N Bell Dr.  |
|  |
| **City** | GREEN VALLEY |
| GREEN VALLEY - Enhanced |
| **State** | AZ |
| AZ - Enhanced |
| **ZIP Code** | 85614 |
| 85614- Enhanced |
| **Country** | US |
| US - Enhanced |
| **Phone Number(s)** | **Type** | Mobile |
| **Number** | 928-100-2345 |
| **Corroborative Statement to Filer** | No |
| **Relationship to Reporting****Institution(s)** | **Institution TIN** | 630476286. |
| **Relationship of Subject** | Customer: Yes |

**Subject Information**

|  |
| --- |
| Subject 2 of 2 : MONTESINOS, Hortensia |
| **Role** | Subject |
| **Subject Type** | Business owner |
| **Individual/Organization** | Individual |
| **No Known Acct. Involved** | Yes |
| **Last (or Entity) Name** | MONTESINOS |
| MONTESINO - Enhanced |
| **First Name** | HORTENSIA |
| HORTENSIA - Enhanced |
| **Middle Name** | MARIA |
| MARIA - Enhanced |
| **Gender Type** | Female |
| **Date of Birth** | 06/19/1969 |
| **SSN/ITIN** | 500-17-4321 |
| **Form(s) of Identification** | **Identification Type** | Driver's license/State ID |
| **Identification Number** | 9874563 |
| **Other Issuing State** | AZ |
| **Other Issuing Country** | US |
|  | **Street Address** | 495 Color Cove Rd |
|  |
| **City** | SEDONA |
| SEDONA |
| **State** | AZ |
| AZ - Enhanced |
| **ZIP Code** | 86336 |
| 86336- Enhanced |
| **Country** | US |
| US - Enhanced |
| **Phone Number(s)** | **Type** | Mobile |
| **Number** | 928-100-2345 |
| **Corroborative Statement to Filer** | No |
| **Relationship to Reporting****Institution(s)** | **Institution TIN** | 630476286. |
| **Relationship of Subject** | Customer: Yes |

BSA:

**Suspicious Activity Information**

|  |  |
| --- | --- |
| **Amount Involved** | $162,500 |
| **Date or Date Range of Activity** | 12/09/2018 - 07/17/2019 |
| **Money laundering** | Transaction out of pattern for customer(s)  |
| **Identification documentation** | Driver’s license AZ 4457202 |
| **Other suspicious activities** | Suspicious cash deposits |
| **Financial instrument or payment mechanism** | U.S. Currency |
| **Financial product** | Cash |
| **Instrument Product Service Type****Description** | Cash |

**Activity Location**

|  |
| --- |
| Financial Institution Location 1 of 1 |
| **Type of Financial Institution** | BBVA Compass |
| **Primary Regulator** | IRS |
| **Legal Name** | BBVA COMPASS |
| **EIN** | 630476286 |
| **Address(es)** | **Street Address** | 81 W ESPERANZA BLVD |
|  |
| **City** | GREEN VALLEY |
| ARIZONA - Enhanced |
| **State** | AZ |
| AZ - Enhanced |
| **ZIP Code** | 85614 |
| Enhanced |
| **Country** | US |
| US - Enhanced |
| **Internal Control File Number** | A-21-08254  |

BSA:

**Filer Information**

|  |  |
| --- | --- |
| **Primary Regulator** | IRS |
| **Filer Name** | BBVA Compass |
|  |
| **EIN** | 630476286. |
| **Address(es)** | **Street Address** | 15 20th St S |
| Birmingham  |
| **City** | BIRMINGHAM |
|  |
| **State** | AL |
|  |
| **ZIP Code** |  |
| 35233 |
| **Country** | US |
| US - Enhanced |
| **Type of Financial Institution** | **RETAIL BANKING** |
| **Internal control/file number** | A-21-08254 |
| **Contact for Assistance** | **Full Name** | ac |
| **Phone Number** | **Type** | Work |
| **Number** | (205) 297-1986 |

BSA:

**Law Enforcement Information**

No Law Enforcement Information Available

**Narrative**

 BBVA is a federally chartered financial institution headquartered in Birmingham, Alabama, providing

 in the State of Arizona, various financial services and lines of products.

 Monitor transaction systems have detected several cash deposits made into account 210004573

 made by Jimena and Hortensia M Huertas.

 The account holder and sole controller of this account is Mark Champa,

 KYC and onboarding data state that this account is expected to be used by Mr. Champa’s

 Business (MC Arizona ATM Financial Service LLC). Both Huertas are not authorized users of the

 account; therefore, the bank directly contacted Mr. Champa to accept the deposits.

 The total cash deposits have been made at the Green Valley BBVA branch. Eight CTRs

 Submitted to Treasury as requested by BSA, and regulatory requirements have been filed for

 these cash deposits.

 The aggregated amount deposited by Huertas reached $162,500.00.

 The cash deposits do not fit the expected account funding streams for which the account was opened.

 The account manager in the Flagstaff branch contacted CHAMPA to explain the origin

 of the cash deposits in question. Champa stated that deposits were business-collected revenue.

 Analysis that the amount and form of the deposits were made did not correspond with the process of

 managing and servicing an ATM line of service.