

# SOP-04 — Form 8300 / Cash Over USD 10,000

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**Trigger:** Receipt of more than USD 10,000 in cash (or cash equivalents — see § 2) in one transaction or in related transactions. **Owner:** Finance + Compliance Officer.

## 1. Statutory basis

26 USC § 6050I + 31 USC § 5331. Filing on IRS / FinCEN Form 8300 within **15 days** of receipt. Written notice to the payer by **31 January** of the following year (Form 8300 Statement). Tipping-off prohibition: customer is told the filing has been made; not before it is decided.

## 2. What counts as "cash"

- US and foreign currency.
- Cashier's checks, money orders, bank drafts and traveler's checks with a face value of USD 10,000 or less when used to make a designated reporting transaction or to avoid Form 8300 reporting.

Personal/business checks, ACH and wire transfers, and credit card payments processed through a financial institution's network are **not** cash for Form 8300 purposes — but they remain subject to KYC/AML screening.

## 3. Procedure

- 1 Booking owner alerts Finance and Compliance immediately on becoming aware that payment will be made in cash or in covered instruments.
- 2 Collect from the payer: full legal name, address, DOB, TIN/SSN/passport number, occupation, relationship to charterer.
- 3 Verify with a government-issued photo ID; keep a copy.
- 4 Confirm no structuring (e.g., two USD 6,000 payments two days apart for the same booking). Suspected structuring → escalate to Compliance Officer; refuse the booking and consider a SAR.
- 5 Finance files Form 8300 via the BSA E-Filing System within 15 days of receipt.
- 6 By 31 January following the calendar year, Finance sends the payer the Form 8300 Statement (written notice that we filed).

## 4. Records

5 years from the date of the filing. Encrypted at rest.

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