When the Member Insists

A practical kit for the moment a scam warning isn't enough

For credit union and community bank staff. From Adalma. November 2026.

You warned the member. You asked questions. The member still wants the money sent. This kit is for what happens next: the conversation, the hold if the law allows one, the record, and the referral.

It's free and there's nothing to buy. Use what helps and change what doesn't fit. Pieces 3 and 5 touch the law, so have your counsel read them before anyone relies on them.

What's inside

Piece	What it's for
1	**Intervention checklist.** The steps from the alert to the decision, and who does each one.
2	**Member conversation guide.** How to talk with a member who insists, by type of scam.
3	**Sample member acknowledgment form.** A starting point for your counsel to adapt.
4	**APS and law-enforcement referral packet.** What to include so a referral gets picked up.
5	**State hold-law quick reference.** 30 states, each row with its statute and source.
6	**Examiner documentation checklist.** What a complete intervention record contains.

About the legal pieces. The hold-law rows in piece 5 were each read against the statute text on October 8, 2026. Laws change. Tennessee and Georgia are marked unconfirmed. Nothing in this kit is legal advice.

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Intervention checklist: from the alert to the decision

Use this for any payment you believe is going to a scam, whether the alert came from a system, a teller, or a phone call. The order matters less than making sure no step is skipped. Write down names and times as you go. Before you need it, fill in who holds each role at your institution. If the member is in immediate danger or someone is threatening them, call local law enforcement first.

Step	What to do	Who	Done
1. Pause	Stop the item or move it to manual review before it posts, if your policy and agreements allow. Note the exact time the alert came in. Don't call it a scam yet. You're pausing to check.	Whoever sees the alert: teller, member service, fraud analyst	☐
2. Verify	Check what you can without the member: the destination and who owns it, recent changes (device, phone, address, new payee), how this compares with past activity, and who is on the account (signers, power of attorney). Use contact details already on file, not details from the request.	Fraud analyst or BSA officer	☐
3. Talk with the member	Speak with the member, in person or by the number on file. Ask open questions and listen (see piece 2). Say the callback rule. For a large or high-risk payment, have a second staff member present or on the line.	Staff member with the relationship, plus a second person	☐
4. Trusted contact	If the member named a trusted contact or agrees to you calling one, call them. Share your concern about possible exploitation. Don't share more account detail than the member allowed. Never call someone who may be involved. When in doubt, don't.	Fraud or branch manager	☐
5. Hold, if the law allows	Find the legal basis before you say the word "hold": a state statute (piece 5), your account agreement, or a network rule. Write down the basis, the start time, the day count and every notice the law requires. If you can't find a basis, don't invent one. Ask counsel, and treat it as persuasion only.	BSA or compliance officer, with counsel as needed	☐
6. Document	Record as you go, not afterward. Use the list in piece 6. Mark any late entry as late.	Everyone who touches the case	☐
7. Escalate	Hand the case to the person your policy names for the decision. If you can, make that someone other than the person who had the conversation. Do it the same day.	BSA or fraud officer, then management	☐
8. Refer	Check your state's APS reporting duty and deadline (piece 5). Make the APS and law-enforcement referral if it's required or warranted (piece 4). Decide separately on a SAR. One doesn't replace the other.	BSA officer	☐
9. Decide	Choose and record: carry out the member's instruction (with an acknowledgment, if counsel approved a form), continue a lawful hold, decline the item where your agreement allows, or restrict or close the account under policy. Write down who decided, when, and why.	The named decision-maker	☐
10. Follow up	Set a date, usually within a few days, to check in with the member and review the account. Watch for the same payment trying another route: a cashier's check, another branch, another payee. Record the outcome and close the file.	Fraud analyst or relationship owner	☐

Member conversation guide: when the member insists

Most members who insist aren't being stubborn. They've been told, by someone they trust or fear, that you'll say exactly what you're about to say. Your job is to stay on their side of the table.

Four habits that work in every conversation

Ask, don't tell. Open questions let the member notice the problem. Statements make them defend the scammer.

Describe what you see, not what they are. "This payment looks like ones that went to scammers" is easier to hear than "you're being scammed."

Say the callback rule every time. "We will never ask you to move money to protect it. If anyone says they're from us and asks you to, hang up and call the number on your card or our website." Say it even if the member says they've heard it. Members can't tell a real call from a fake one, so give them a rule that works either way.

Keep the door open. The member may come back after the scammer asks again, or after the money's gone. They should feel they can call you without being judged.

By type of scam

Type	Questions to ask	What not to say	What to try instead
Romance The person is far away, can't video chat, and needs money for travel, medical bills or a stuck investment.	How did you two meet? Have you seen each other on video? Has this person asked for money before? What happens if the payment waits a few days?	"That person isn't real." "How could you fall for this?" "You're being scammed."	"I can tell this person matters to you. Requests like this are common enough that we ask about every one. Would you be willing to ask for a live video call before we send it?"
Government or tech-support impersonation A caller says to move money to "protect" it, buy gift cards, or let them onto the computer.	Who contacted you, and how? Did they call you, or did you call them? What did they ask you to do with the money? Did they ask you to keep it from us? Did anyone get access to your computer or phone?	"Agencies never do that. You should know that." "Why would you believe a caller?"	"Real agencies don't ask you to move money to protect it, and neither do we. If you hang up and call the number on the agency's own website, we'll wait." If someone had remote access: disconnect, then change passwords from a different device.
Investment or crypto High returns, an app that shows gains, fees to release funds, a "mentor" met online.	Who is the company? How did you find it? Can you withdraw money today? Has anyone asked for more money before you can take your earnings out? Who helped you set up the account?	"Crypto is a scam." "You'll lose everything."	"Before more goes in, could you try a small withdrawal? A real platform will let you take money out." Suggest checking the firm with your state securities regulator.
Family or caregiver pressure A relative or helper speaks for the member, holds the phone, or benefits from the payment.	Ask privately, away from the companion: "We talk one on one with members about large transactions." Is this your decision? Is anyone pressuring you or keeping you from your money? Do you have the help you need at home?	Anything that accuses the relative. Questions asked in front of the companion. Promises of secrecy you can't keep.	"You're in charge of your money. I want to be sure this is what you want." Don't use the companion as a trusted contact. Don't judge capacity yourself. Record what you saw and escalate.

Type	Questions to ask	What not to say	What to try instead
Check or wire coaching A "buyer" or "employer" sent a check; the member is to wire part of it back. The member has a script.	Who gave you the wire instructions? Has anyone told you what to say if we ask? Did they tell you not to tell us? Do you know a check can bounce weeks after the money shows in your account?	"You're lying to me." "This is obviously fake."	"Being told what to say to us is a warning sign. You don't have to explain. Can we wait until the check has fully cleared before any money goes out?"

How to avoid shaming

Say that anyone can be targeted and that these schemes are built by people who do it for a living. Thank the member for talking with you. Never repeat the warning more than twice. Never mention how much they've already lost unless they bring it up.

When to stop

- The member has heard your concern, answered your questions, and says clearly it's their decision.
- The member is distressed or angry enough that more talking will cost you the relationship.
- Someone who may be the suspect is listening in.
- You've said the same thing twice and nothing has changed.

When you stop, say so kindly: "I've said my piece. If anything changes, call me directly." Then document the conversation and escalate. Stopping the conversation doesn't end your duties. Reporting duties and the decision on the payment still follow (piece 1).

PIECE 3 OF 6

Sample member acknowledgment form

SAMPLE. For your institution's counsel to adapt. Not legal advice. This form isn't ready to use as written. Don't put it in front of a member until counsel has reviewed it for your state, your account agreements and your regulator.

Institution: _____ **Date and time:** _____

Member name: _____ **Account (last four):** _____

Payment: type _____ amount $_____ to (name and destination) _____

Staff who spoke with the member: _____ **Title:** _____

What we explained

- ☐ We told you we're concerned that this payment may be connected to a scam.
- ☐ We explained what we noticed: _____
- ☐ We told you that [institution] will never ask you to move money to protect it.
- ☐ We explained that money sent by wire, transfer, cash or crypto is often very hard or impossible to get back.
- ☐ We offered to [delay the payment while we check / contact a trusted person you've named / other step counsel approves]: _____
- ☐ We gave you information on how to report this (for example, to adult protective services, local law enforcement, or the FTC at ReportFraud.ftc.gov).
- ☐ We told you that we may be required to share our concerns with authorities.

Your decision

- ☐ I've decided to go ahead with this payment.
- ☐ I've decided not to send this payment.
- ☐ I want more time. I'll contact [institution] again on or before _____.

In my own words (optional): _____

I understand what the staff member told me. The decision about this payment is mine. I received a copy of this form.

Member signature: _____ **Date:** _____

Staff signature: _____ **Date:** _____

Second staff or manager: _____ **Date:** _____

☐ The member declined to sign. Staff note (what was said, time): _____

Drafting notes for counsel

Decide whether this is a plain record of what was said and chosen, or something more. The less it reads like a release of the member's rights, the better it will read to a regulator.

Check it against your account agreements, funds-availability and electronic-transfer disclosures, and state hold law (piece 5). Use plain language, let the member read it, and give them a copy.

Signing shouldn't be a condition of anything the member is already entitled to. Decide what staff do when a member declines. Don't mention a SAR on the form.

PIECE 4 OF 6

APS and law-enforcement referral packet template

A referral gets picked up when the reader can tell in a minute who is hurt, who's doing it, where the money went, and what to do next. Keep it short, factual and specific. Attach records instead of describing them. Send the same facts to every agency, and say who else has the report.

Section	What to include
Header	Date and time of referral. Agency and person receiving it. Your institution's name. One named contact at your institution with a direct line and email, who will answer. Your internal case number.
Summary	Three or four sentences: what happened, how much, where the money is now, and what you're asking the agency to do. Say plainly if funds are still in motion and the next date a payment may go out.
The member	Name, date of birth, address, phone, and who lives with them if known. Whether the member knows about this referral. Any trusted contact. What you've seen that concerns you about their situation (isolation, confusion, dependence on a helper). Describe observations, not diagnoses.
The suspect	Name or alias, if known. **Relationship to the member:** stranger, online contact, relative, caregiver, agent under a power of attorney, other. How contact began. Phone, email, social handles, website. Account, wallet or destination details. Anyone else involved or present.
Amounts and timeline	A dated list of every event: attempts, completed payments, holds, calls. For each: date and time, channel (wire, ACH, check, cash, card, crypto), amount, destination, and where you got the information. Give totals attempted, completed and stopped.
Why you're concerned	The facts that led you here: changes in behavior, what the member said, what the destination is, how the payment compares with past activity. Quote the member where you can.
What you've done	Verification steps, conversations (who, when), warnings given, hold basis and dates if any, and the member's decision. Say whether the member signed an acknowledgment.
Attachments	Statement excerpts and transaction records. Wire, check or transfer images. Alerts and screenshots. Call and visit notes. Messages the member shared. A copy of any acknowledgment. Anything the member gave you: texts, emails, letters.

A SAR doesn't satisfy an APS reporting duty, and an APS report doesn't satisfy a SAR. They're separate obligations with separate rules. FinCEN says the filing of a SAR is not a substitute for any state requirement to report suspected elder financial exploitation to law enforcement and Adult Protective Services (FinCEN advisory FIN-2022-A002). Check your state's duty and deadline in piece 5. When you file a SAR, use its law-enforcement contact field to note that you also reported to APS or police.

Keep these out of the packet

The SAR itself, or any statement that one was or wasn't filed. Share the underlying facts and records instead. Confirm the line with your counsel.

Conclusions such as "the member has dementia" or "the son is stealing." Give what you saw and let the agency decide.

After you send it

Record the date, method, agency, the person's name and any reference number. Note in the file the deadline you checked and whether you met it. Follow up if you hear nothing within a few days and money may still be moving.

State hold-law quick reference

This is a reference, not legal advice. Confirm with your counsel before you rely on any row.

The starting point. Absent a state law, an account agreement or a network rule that says otherwise, an institution generally has no power to stop a competent member's authorized payment. Warning the member is not a hold. Delaying a payment without a legal basis can create its own risk. That's why this table starts from the statute and not from what feels prudent.

How to read it. "Hold period" is the self-initiated period and any extension, as the statute is encoded in our catalog. Day counts are business days unless stated. "APS report" comes from a separate catalog of state reporting duties. Every row shows its statute, source link and the date a person last read the source and checked the row (Oct 8, 2026). **Unconfirmed** means the text could not be read in full. Don't treat an unconfirmed row as hold authority. This reference covers 30 states. A state that isn't listed hasn't been reviewed here, which doesn't mean it has no law. The federal Senior Safe Act (12 U.S.C. § 3423) protects a qualifying disclosure. It doesn't authorize a hold.

State	Statute	Hold period	Conditions and notes	APS report	Source	Verified
Alabama	Ala. Code §§ 8-6-190 to -195	No fixed period. Ends when the provider reasonably believes the transaction will not result in exploitation.	After a hold, report to DHR and law enforcement and make a reasonable effort to notify the member (Act 2021-78 § 4). Effective Jan 1, 2022. Reaches the suspected perpetrator's account.	Required if you hold; no fixed deadline. Ala. Code §§ 8-6-190 to -195.	https://alison.legislature.state.al.us/files/pdf/SearchableInstruments/2021RS/PrintFiles/SB181-Enr.pdf	Oct 8, 2026
Arkansas	Ark. Code § 4-88-208	No fixed period. Ends when the provider reasonably believes the transaction will not result in exploitation.	After a hold the report to DHS is permissive (§ 4-88-208(c)). Reaches the suspected perpetrator's account.	Mandatory; immediately. Ark. Code § 12-12-1708(a).	https://arkleg.state.ar.us/Home/FTPDocument?path=/ACTS/2021R/Public/ACT1015.pdf	Oct 8, 2026
Colorado	C.R.S. § 11-113-105	90 calendar days, plus 90 more	ASSET Act, HB26-1110; banks and credit unions. Notify law enforcement or county APS within 2 business days of the requested disbursement. That notice is a condition of the delay and of the extension. Effective Aug 12, 2026 (assumes no referendum petition).	Mandatory; within 24 hours. Colo. Rev. Stat. § 18-6.5-108.	https://leg.colorado.gov/bill_files/116711/download	Oct 8, 2026
Connecticut	Conn. Gen. Stat. § 36a-253	7 business days, plus 45 more	Written notice of an extension within 3 business days to the eligible adult, account holders, signatories and trusted contacts, except anyone suspected of the exploitation (PA 23-161 (d)(4)(B)).	Not in our APS catalog. Check with counsel.	https://prdext3.cga.ct.gov/current/pub/chap_665.htm	Oct 8, 2026
Delaware	31 Del. C. § 3910(c)	10 business days, plus 30 more	The 5-business-day figure is the report to the Department, not notice to the customer. Extension follows an agency request, or no word from the Department or DOJ within 10 business days of the report.	Mandatory; within 5 business days. 31 Del. C. § 3910(c). Condition of the hold.	https://delcode.delaware.gov/title31/c039/index.html	Oct 8, 2026
Florida	Fla. Stat. § 415.10341	15 business days, plus 30 more	Report to the central abuse hotline is a prerequisite. Notice deadline: 3 business days. Version effective Jan 1, 2025.	Mandatory; immediately. Fla. Stat. § 415.1034. Condition of the hold.	https://www.flsenate.gov/Laws/Statutes/2025/415.10341	Oct 8, 2026
Georgia	O.C.G.A. §§ 7-1-239.12 to .19	**15 business days, plus 15 more (UNCONFIRMED)**	UNCONFIRMED. Only a Department of Banking and Finance slide deck quoting the Code was read. The enrolled HB 945 text could not be fetched. The deck gives written notice within 3 business days, and training and written procedures before any hold. Effective Jul 1, 2026. Check with counsel.	Mandatory; no fixed deadline. O.C.G.A. § 30-5-4(a)(1)(B). APS row unconfirmed.	https://dbf.georgia.gov/document/document/georgia-transaction-hold-guidance/download	**Unconfirmed. Read Oct 8, 2026**

State	Statute	Hold period	Conditions and notes	APS report	Source	Verified
Kentucky	Ky. Rev. Stat. § 365.245	15 business days, plus 10 more	An APS report is required when holding. Notice deadline: 2 business days.	Mandatory; immediately. Ky. Rev. Stat. § 209.030. Condition of the hold.	https://apps.legislature.ky.gov/law/acts/18RS/documents/0127.pdf	Oct 8, 2026
Louisiana	La. R.S. §§ 6:1371–1376	45 business days; outer limit 60	Act 654 of 2026 (HB 555), in force Aug 1, 2026, raised the periods from 15 and 25. The extension needs a covered agency's request. Notice deadline: 2 business days. Reaches the suspected perpetrator's account (§ 6:1374(A)).	Mandatory; no fixed deadline. La. Rev. Stat. § 15:1504.	https://legis.la.gov/legis/ViewDocument.aspx?d=1480579	Oct 8, 2026
Maryland	Md. Fin. Inst. § 1–307	15 business days, plus 10 more	SB 753 (2026), Ch. 511, effective Oct 1, 2026. Within 4 business days: written notice to the account parties and notice to APS, law enforcement or the State's Attorney. That notice is a condition of the delay.	Mandatory; within 24 hours. Md. Fin. Inst. § 1–306(d).	https://mgaleg.maryland.gov/2026RS/bills/sb/sb0753T.pdf	Oct 8, 2026
Michigan	Mich. Comp. Laws §§ 487.2081–2091	10 business days (statutory default)	Duration follows the service agreement when one exists. After APS or law enforcement says it is investigating, the hold may run until dismissal or no continued risk (§ 487.2087(2)).	Not in our APS catalog. Check with counsel.	https://www.legislature.mi.gov/documents/mcl/pdf/mcl-Act-344-of-2020.pdf	Oct 8, 2026
Minnesota	Minn. Stat. § 45A.06 subd. 2	15 business days, plus 10 more	Notify the common entry point within 2 business days of a discretionary hold. Extension to 25 business days is at the request of the commissioner, law enforcement or a prosecutor. Subd. 2(d) lets the provider add up to 10 more.	Required if you hold; within 2 business days. Minn. Stat. § 45A.06.	https://www.revisor.mn.gov/statutes/cite/45A.06	Oct 8, 2026
Mississippi	Miss. Code § 81–5–107	10 calendar days, plus 10 business days	Extension is at DHS or law-enforcement request. Notify DHS promptly after a delay (§ 81–5–107(4)).	Mandatory; immediately. Miss. Code § 43–47–7.	https://codes.findlaw.com/ms/title-81-banks-and-financial-institutions/ms-code-sect-81-5-107/	Oct 8, 2026
Montana	Mont. Code §§ 32–1–1501 to -1504	15 business days, plus 10 more	Notice deadline: 2 business days.	Permissive. Mont. Code § 32–1–1502.	https://mca.legmt.gov/bills/mca/title_0320/chapter_0010/part_0150/section_0030/0320-0010-0150-0030.html	Oct 8, 2026
Nebraska	Neb. Rev. Stat. § 8–2903	30 business days	Continued reasonable belief may support further extension, subject to court order.	Not in our APS catalog. Check with counsel.	https://nebraskalegislature.gov/laws/statutes.php?statute=8-2903	Oct 8, 2026
Nevada	Nev. Rev. Stat. § 657.290	15 business days, plus 10 more	Notice to the Aging and Disability Services Division and law enforcement within 2 business days of the hold. 25 business days in total when APS or law enforcement asks in writing.	Mandatory; no fixed deadline. Nev. Rev. Stat. § 657.290(2).	https://www.leg.state.nv.us/nrs/nrs-657.html	Oct 8, 2026
New Hampshire	N.H. Rev. Stat. § 383-A:5-511-a	15 business days	Notice deadline: 2 business days. Further extension is by court order.	Mandatory; immediately. N.H. RSA 161-F:46.	https://gc.nh.gov/rsa/html/XXXV/383-A/383-A-5-511-a.htm	Oct 8, 2026
North Carolina	N.C. Gen. Stat. § 108A-117.1	30 business days, plus 30 more	S.L. 2026-31 § 13.1(d), effective Jul 2, 2026. Written procedures and training must be in place before any delay. Covers accounts of, or benefiting, a disabled or older adult. The § 108A-115 report runs separately.	Mandatory; no fixed deadline. N.C. Gen. Stat. § 108A-115(a).	https://www.ncleg.gov/EnactedLegislation/SessionLaws/HTML/2025-2026/SL2026-31.html	Oct 8, 2026
North Dakota	N.D. Cent. Code §§ 6-08.5-01 to -05	No fixed period. § 6-08.5-02 sets no duration.	Notice to the account holder is a reasonable effort with no deadline. A hold involving a vulnerable adult must be reported to DHHS. Reaches the suspected perpetrator's account.	Required if you hold; no fixed deadline. N.D. Cent. Code § 6-08.5-02(4)(b).	https://ndlegis.gov/cencode/t06c08-5.pdf	Oct 8, 2026
Oklahoma	6 O.S. § 3401(D)	10 business days, plus 10 more (20 in total)	SB 2067 (2026), enrolled text, effective Nov 1, 2026. Notice deadline: 3 business days.	Mandatory; no fixed deadline. 43A O.S. § 10-104. APS row unconfirmed.	https://www.oklegislature.gov/cf_pdf/2025-26%20ENR/SB/SB2067%20ENR.PDF	Oct 8, 2026
Oregon	Or. Rev. Stat. § 708A.675	15 business days	May continue while a reasonable belief persists.	Permissive. Or. Rev. Stat. §§ 124.050, 124.060.	https://oregon.public.law/statutes/ors_708A.675	Oct 8, 2026

State	Statute	Hold period	Conditions and notes	APS report	Source	Verified
Rhode Island	R.I. Gen. Laws § 19-34-4	15 business days, plus 30 more	An APS report to the department is a condition of the hold (§ 19-34-4(a)).	Mandatory; within 7 business days. R.I. Gen. Laws § 19-34-2(b). Condition of the hold.	https://webserver.rilegislature.gov/Statutes/TITLE19/19-34/19-34-4.htm	Oct 8, 2026
South Carolina	S.C. Code § 43-35-87	30 business days, plus 25 more (55 in total)	The § 43-35-87(E) report follows the hold. Reaches the suspected perpetrator's account.	Required if you hold; within 24 hours. S.C. Code § 43-35-87(E). APS row unconfirmed.	https://www.scstatehouse.gov/code/t43c035.php	Oct 8, 2026
Tennessee	Tenn. Code § 45-2-1203	**5 business days (UNCONFIRMED)**	UNCONFIRMED. Check with counsel. Public Chapter 264 (2017) § 7 repealed the hold section on Jun 30, 2022, and no extending act was found. Later acts cite the part as § 45-2-1201 et seq., whose current text was not read. The 2017 text gave 5 business days and required an APS report after the hold. Don't treat this row as hold authority.	Mandatory; immediately. Tenn. Code § 71-6-103. APS row unconfirmed.	https://www.tn.gov/content/dam/tn/financialinstitutions/images/pc0264.pdf	**Unconfirmed. Read Oct 8, 2026**
Texas	Tex. Fin. Code § 281.004	10 business days, plus 30 more	A self-initiated hold requires a prior DFPS report. An agency-requested hold is mandatory.	Mandatory; within 5 business days. Tex. Fin. Code § 281.002(b). Condition of the hold.	https://texas.public.law/statutes/tex._fin._code_section_281.004	Oct 8, 2026
Utah	Utah Code §§ 7-26-101 et seq.	15 business days, plus 10 more	Extendable to 25 business days at a law-enforcement request (§ 7-26-301(3)). Notice to each authorized party within 2 business days (§ 7-26-301(2)(a)(i)).	Mandatory; immediately. Utah Code § 26B-6-205. APS row unconfirmed.	https://le.utah.gov/xcode/Title7/Chapter26/C7-26_2020051220200512.pdf	Oct 8, 2026
Vermont	8 V.S.A. §§ 10801-10806	15 business days, plus up to 15 more days	Act 106, effective May 20, 2026. Applies to any customer, not only seniors. The Act says "up to an additional 15 days" without saying business or calendar days. Check with counsel.	Permissive. 8 V.S.A. §§ 10801-10806.	https://legislature.vermont.gov/Documents/2026/Docs/ACTS/ACT106/ACT106%20As%20Enacted.pdf	Oct 8, 2026
Virginia	Va. Code § 63.2-1606(L)	30 business days	The hold must be reported to APS within 5 business days. That is the APS report, not notice to the customer.	Required if you hold; within 5 business days. Va. Code § 63.2-1606(L).	https://law.lis.virginia.gov/vacode/title63.2/chapter16/section63.2-1606/	Oct 8, 2026
Washington	Wash. Rev. Code § 74.34.215	5 business days (10 for securities)	Reaches the suspected perpetrator's account. A hold must be reported to APS and local law enforcement; § 74.34.215 sets no deadline.	Required if you hold; no fixed deadline. Wash. Rev. Code § 74.34.215.	https://app.leg.wa.gov/RCW/default.aspx?cite=74.34.215	Oct 8, 2026
Wyoming	Wyo. Stat. §§ 13-1-701 to -706	5 business days, plus 30 more	Effective Jul 1, 2023. A self-initiated hold requires a DFS report. An agency-requested hold is mandatory.	Mandatory; within 5 business days. Wyo. Stat. § 13-1-702(b). Condition of the hold.	https://wyoleg.gov/2023/Enroll/SF0024.pdf	Oct 8, 2026

Where this came from. Statute text at each linked source, read Oct 8, 2026. APS-duty source links are listed in kit-sources.md. Laws change, including bills taking effect in late 2026. Check the current text and have counsel confirm before acting.

PIECE 6 OF 6

Examiner documentation checklist

An examiner, an auditor or a member's lawyer will ask the same thing: what did you do, when, who decided, and on what basis? A complete record answers it without anyone's memory. Use this list to check a closed case, or as the outline for the file.

Record	A complete record contains	Done
Alert	Source of the alert (system rule, staff, member, third party). Date and time received. Transaction details: type, amount, destination. Who received it and what they did first.	☐
Verification	What was checked (destination, recent changes, account activity, signers) and what was found. Who checked, and when.	☐
Conversation notes	Date, time and channel. Who took part and who else was present. What was asked, the member's answers in their own words, the warnings given, and that the callback rule was stated. Notes written at the time. Late entries marked as late.	☐
Trusted contact	Whether the member named one, and their consent. If contacted: who, when, what was shared. If not contacted: why not.	☐
Decision and decision-maker	Name and title of the person who decided. Date and time. Options considered. Reason for the choice. The policy section relied on.	☐
Hold basis and dates	The statute, agreement term or network rule relied on, with citation. Start time. Notices sent, to whom and when. Extension decision and its basis. End date and the reason for release. If no hold was placed, why not.	☐
Acknowledgment	Signed copy, or a note that the member declined. Version of the form used. Who explained it. Copy given to the member.	☐
Referrals	APS and law-enforcement referrals: agency, date and time, method, person's name, reference number, and the attached packet. The state reporting duty you checked and whether the deadline was met.	☐
SAR decision	Whether a SAR was filed or not, the date, and the reasoning. Keep the SAR and its workpapers in the confidential SAR file, not in the member file. Note any continuing-activity review.	☐
Follow-up	Dates and outcomes of check-ins. Further attempts or new payees. Account restrictions or closure, with reasons. What the member was told. Date the file was closed and by whom.	☐

Quick quality check

- Is every entry dated, timed and signed or attributed to a person?
- Is the whole case in one place, so one person can pull it in an hour?
- Is it kept under your retention policy?

Questions to be ready for

- What did your staff do, and in what order?
- Who decided to release, hold or close, and why?
- What law or agreement gave you the right to hold the payment?
- Did you meet your state's APS reporting duty and its deadline?

If you'd like a second set of eyes, we'll review two or three of your closed scam cases against this kit in one free 45 minute session. You don't need to share member data. Write to vivek@adalma.ai.