



## **CUSTOMER IDENTIFICATION PROGRAM NOTICE DISCLOSURE**

***To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account.***

We will collect certain minimum customer identification Program (CIP) from each customer who opens an account; utilize risk based measures to verify the identity of each Customer who opens an account; record CIP and the verification methods and results: Provide notice to customers that we will seek identification information and compare customer identification information with government-provided list of suspected terrorists.

We will collect the following information of any person, entity or organization who is opening a new account and whose name is on the account: the name, date of birth (individual); an address, which will be a residential or business street address (for an individual), an Army Post Office ("APO") or Fleet Post Office ("FPO") number, or residential or business street address of next of kin or another contact individual (for an individual who does not have a residential or business street address), or a principal place of business, local office or other physical location (for a person other than an individual); an identification number, which will be a taxpayer identification number (for US persons) or one or more of the following: a taxpayer identification number, passport number and country of issuance, alien identification card number or number and country of issuance of any other government issued document evidencing nationality or residence and bearing a photograph or other similar safeguard (for non US persons). In the event that a customer has applied for, but has not received a taxpayer identification number, we will follow our AML procedures to confirm that the application was filed before the customer opens the account to obtain the taxpayer identification number within a reasonable period of time after the account is opened.

When opening an account for a foreign business or enterprise that does not have an identification number, we will request alternative government-issued documentation verifying the existence of the business or enterprise.

We may, under the following circumstances, rely on the performance by another financial institution (including an affiliate) of some or all of the elements of our customer identification program with respect to any customer that is opening an account or has established an account or similar business relationship with the other financial institution to provide or engage in services, dealings, or other financial transactions

- When such reliance is reasonable under the circumstances;
- When the other financial institution is subject to a rule implementing the

Anti-money laundering compliance program requirements of 31 U.S.C. 5318(h), and is regulated by a Federal functional regulator; and

When the other financial institution has entered into a contract with our firm  
Requiring it to certify annually to us that it has implemented its anti-money  
Laundering program and that it will perform (or its agent will perform) specified  
requirements of the customer identification program.

### **Customer Who Refuse to Provide Information**

If a potential or existing customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, our firm will not open a new account and, after considering the risks involved, consider closing any existing account. In either case, our AML Compliance officer will be notified so that we can determine whether we should report the situation to FinCen.

Based on the risk, and to the extent reasonable and practicable, we will ensure that we have a reasonable belief that we know the true identity of our customers by using risk-based procedures to verify and document the accuracy of the information we get about our customers. In verifying customer identity, we will analyze logical inconsistencies in the information we obtain.

We will verify customer identity through documentary evidence, non-documentary evidence or both. We will use documents to verify customer identity when appropriate documents are available. In light of the increased instances of identity fraud, we will supplement the use of documentary evidence by using the non-documentary means described below whenever possible. We may also use such non-documentary means, after using documentary evidence, if we are still uncertain about whether we know the true identity of the customer. In analyzing the verification information, we will consider whether there is a logical consistency among the identifying information provided, such as the customer's name, street address, zip code, telephone number, date of birth, and social security number.

Appropriate documents for verifying the identity of customers include, but are not limited to the following:

For an individual, an unexpired government-issued identification evidencing Nationality, residence, and bearing a photograph or similar safeguard, such as A drivers license or passport; and

For a person other than an individual, documents showing the existence of the Entity, such as certified articles of incorporation, a government-issued business license, a partnership agreement, or a trust instrument.

We understand that we are not required to take steps to determine whether the document That the customer has provided to us for identity verification has been validly issued and

That we may rely on a government-issued identification as verification of a customer's identity, If, however, we note that the document shows some obvious form of fraud, we must consider that factor in determining whether we can form a reasonable belief that we know the customer's true identity.

We will use the following non-documentary methods of verifying identity:

Contacting a customer:

Independently verifying the customer's identity through the comparison of information provided by the customer with information obtained from a Consumer reporting agency, public database, or other source;

Checking references with other financial institutions; or

Obtaining a financial statement

Consumer information from credit reporting agencies and other companies

Consumer credit card history or when you apply for a service

Information related to your transactions with our clearing firm, such as Account balances and payment history

Information we obtain from others at your request, such as information about Assets held at another institution

Information obtained when you use internet products and services, such as Application and transaction information contained in e-mails and faxes you send us.

We will use non-documentary methods of verification in the following situations: (1) when the customer is unable to present an unexpired government-issued identification document with photograph or other similar safeguard; (2) when the firm is unfamiliar with the documents the customer presents for identification verification; (3) when the customer and firm do not have face to face contact; and (4) when there are other circumstances that increase the risk that the firm will be unable to verify the true identity of the customer through documentary means.

We will verify the information within a reasonable time before or after the account is opened. Depending on the nature of the account and requested transactions, we may refuse to complete a transaction before we have verified the information, or in some instances when we need more time, we may, pending verification, restrict the types of transactions or dollar amount of transactions. If we find suspicious information that indicates possible money laundering or terrorist financing activity, we will, after internal

consultation with the firm's AML compliance officer, file a SAR-SF in accordance with applicable laws and regulations.

We recognize that the risk that we may not know the customer's true identity may be heightened for certain types of accounts, such as an account opened in the name of a corporation, partnership or trust that is created or conducts substantial business in a jurisdiction that has been designated by the U.S. as a primary money laundering concern or has been designated as non-cooperative by an international body. We will identify customers that pose a heightened risk of being properly identified. Therefore, we will take the following additional measures that may be used to obtain information about the identity of the individuals associated with the customer when standard documentary methods prove to be insufficient; if we cannot verify customer information we will obtain the information about the individuals who have the authority or control of the account.

When we cannot form a reasonable belief that we know the true identity of a customer, we will do one or all of the following: (A) Not open an account; (B) impose terms under which a customer may conduct transactions while we attempt to verify the customer's identity; (C) close an account after attempts to verify customer's identity fail; and (D) file a SAR-SF in accordance with applicable law and regulation.

We will document our verification, including all identifying information provided by a customer, the methods used and the results of verification and the resolution of any discrepancy in the identifying information.

With respect to non-documentary verification, we will retain documents that describe the methods and the results of any measures we took to verify the identity of a customer.

We will maintain records of all identification information for five years after the account has been closed; we will retain records made about verification of the customer's identity for five years after the record is made.

***We thank you for your patience and hope that you will support the financial industry's efforts to deny terrorists and money launderers access to America's financial system.***

We value our customers. For comments and/or complaints please contact our Compliance Department at 787-763-5868.