



# Customer Identification Program

Individual Accounts	Yes	No	Comments
1. Did the institution collect the following information:			
a. Legal Name			
b. Doing Business As (DBA) name, if applicable			
c. Date of Birth			
d. Street address (using only a physical address, Fleet Post Office Box, or Army Post Office Box)			
e. Identification Number (For a U.S. citizen, Social Security Number. For a non-U.S. citizen, passport number and country of issuance, Alien Identification Number (AIN), or ITIN)			
f. Any other information as required by the CIP?			
2. Did the institution review an unexpired government-issued form of identification that evidences the customer's nationality or residence and bear a photograph?			
3. Did the institution use any non-documentary methods such as information obtained from a consumer reporting agency or public database or checking references with other institutions?			
Business Accounts	Yes	No	Comments
4. Did the institution collect the following information:			
a. Legal Name			
b. Doing Business As (DBA) name, if applicable			
c. Date of Birth			



# BAI Customer Identification Program

Business Accounts	Yes	No	Comments
d. Street address of the entity's principal place of business, local branch office, or other location (PO Boxes are not acceptable)			
e. Identification Number (Employer Identification Number or Taxpayer Identification Number)			
f. Any other information as required by the CIP?			
5. Did the institution obtain documents showing the legal existence of the entity such as certified articles of incorporation, an unexpired government-issued business license, a partnership agreement or a trust instrument?			
6. Did the institution use any non-documentary methods such as information obtained from a consumer reporting agency or public database, checking references with other institutions or obtaining a financial statement?			
Beneficial Owners for Legal Entities	Yes	No	Comments
7. Did the institution obtain a certification from the individual opening the account on behalf of the legal entity identifying the beneficial owner(s)?			
8. Ownership Prong – Were all applicable natural persons with 25% or more ownership of the legal entity? <i>Note: There may be no beneficial owners listed for the ownership prong.</i>			
9. Control Prong – Was at least one individual identified from the control prong, a natural person who has significant responsibility to control, manage or direct the legal entity?			
10. Was the following information collected on each beneficial owner:			
a. Legal Name			
b. Doing Business As (DBA) name, if applicable			

# BAI Customer Identification Program

Beneficial Owners for Legal Entities	Yes	No	Comments
c. Date of Birth			
d. Street address of the entity's principal place of business, local branch office, or other location (PO Boxes are not acceptable)			
e. Identification Number (Employer Identification Number or Taxpayer Identification Number)			
f. Any other information as required by the CIP?			

Lack of Verification	Yes	No	Comments
11. If the institution was unable to verify the customer's identity, does the institution not open the account or restrict access to the account while it attempts to verify the customer's identity?			

Customer Notice	Yes	No	Comments
12. Was the customer notified of the customer identification requirements using language similar to the following:			

## IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING A NEW ACCOUNT

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

Comparison with Government Lists	Yes	No	Comments
13. Was the compared to any federal government list of known or suspected terrorists? Note: There is currently no designated government lists. OFAC is a separate and distinct requirement.			
14. Were all customers checked against the OFAC SDN List?			