



## **Beneficial Owner FAQ's**

Beginning May 11, 2018, the Financial Crimes Enforcement Network (FinCEN) requires covered financial institutions to collect information on the beneficial owners of all legal entity members and collect information to understand the nature and purpose of member relationships.

### **Why do I have to provide this information?**

To help the government fight financial crime, Federal Law requires that we obtain, verify, and record information about the beneficial owners of legal entity members. 31CFR 1010-1023

### **What is considered a legal entity?**

For the purpose of obtaining beneficial owners, a legal entity includes a Corporation, Limited Liability Company, or other entity that is created by a filing of a public document with a Secretary of State or similar office, a General Partnership, and any similar business entity formed in the United States or a foreign country. Legal entity does not include Sole Proprietorship, Unincorporated Associations, or natural persons opening accounts on their own behalf.

### **Who is a Beneficial Owner?**

The regulation defines a beneficial owner as:

- Each individual, if any, who owns directly or indirectly, 25% or more of the equity interests of the legal entity (e.g., each natural person that owns 25% or more of the share of a corporation); AND
- An individual with significant responsibility for managing the legal entity (e.g., Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, or Treasurer).

### **What information do I have to provide?**

You are required to provide the name, physical business or personal address, date of birth and Social Security number (or passport number or other similar information, in the case of non-US persons) for the beneficial owner and individual with significant responsibility, as well as, provide a copy of each beneficial owner's and significant responsible individual's identification. Expired ID's will not be accepted.

