

BENEFICIAL OWNERS OF LEGAL ENTITIES

What is this form?

To help the government fight financial crime, Federal regulation requires certain financial institutions to obtain, verify, and record information about the beneficial owners of legal entity customers. Legal entities can be abused to disguise involvement in terrorist financing, money laundering, tax evasion, corruption, fraud, and other financial crimes. Requiring the disclosure of key individuals who own or control a legal entity (i.e., the beneficial owners) helps law enforcement investigate and prosecute these crimes.

Who has to complete this form?

This form must be completed by individuals associated with a legal entity with any of the following financial institutions: a bank or credit union; (ii) a broker or dealer in securities; (iii) a mutual fund; (iv) a futures commission merchant; or (v) an introducing broker in commodities.

For the purposes of this form, 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 proprietorships, unincorporated associations, or natural persons opening accounts on their own behalf.

What information do I have to provide?

This form requires you to provide your name, address, date of birth and Social Security number (or passport number or other similar information, in the case of foreign persons) if you meet the following criteria for individuals (i.e., the beneficial owners):

- (i) You own, directly or indirectly, 25 percent or more of the equity interests of the legal entity customer (e.g., each natural person that owns 25 percent or more of the shares of a corporation); and
- (ii) You have significant responsibility for managing the legal entity customer (e.g., a Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, or Treasurer).

The number of individuals that satisfy this definition of “beneficial owner” may vary. Under section (i), depending on the factual circumstances, up to four individuals (but as few as zero) may need to be identified. Regardless of the number of individuals identified under section (i), the legal entity applying for a new account must provide the identifying information of one individual under section (ii). It is possible that in some circumstances the same individual might be identified under both sections (e.g., the President of Acme, Inc. who also holds a 30 percent equity interest). Thus, a completed account application for the legal entity will contain this form with identifying information for at least one individual (under section (ii)), and up to five individuals (i.e., one individual under section (ii) and four 25 percent equity holders under section (i)).

R.J. O'Brien requires all beneficial owners to provide photo identification. US Persons can provide a copy of their driver's license, passport or Government ID. Non-US persons must provide a copy of their passport.



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Please complete this form as it relates to opening of a new account on behalf of a legal entity (Applying Entity). This form must be received from any individual who: 1) can answer “yes” to the first question below and/or 2) at least one person who can answer “yes” to the second question below. R.J.O'Brien must receive at least one completed form for each Applying Entity.

If another legal entity owns 25% or more of the Applying Entity, it is considered the “Owner Entity”. The Owner Entity must submit at least one Beneficial Owners of Legal Entities form.

Form is in reference to: Applying Entity Owner Entity

Applying Entity

Name of Legal Entity

Legal Type for Legal Entity (e.g. LLC, etc.)

Address of Legal Entity

Owner Entity, if applicable

Name of Legal Entity

Owner Entity must also provide the name of the Applying Entity to properly link account opening documents.

Please answer both of the questions below.

Yes No Do you directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, own 25 percent or more of the equity interests of the legal entity listed above?

Yes No Do you have significant responsibility for managing the legal entity listed above, such as:

- An executive officer or senior manager (e.g., Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, Treasurer); or
- Are you an individual who regularly performs similar functions?

If you answered yes to either of the questions above, please provide the following information:

Name and Title	
Date of Birth	
Address (Residential or Business)	
<u>Identification</u> <ul style="list-style-type: none"> • US Person: Social Security Number • Non-US Person: Passport Number 	

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I, _____ hereby certify, to the best of my knowledge, that the information provided above is complete and correct.

Signature: _____ Date: _____

This form can be returned directly to: newaccountdocs@rjobrien.com