

**5.F. CUSTOMER IDENTIFICATION PROGRAM QUICK REFERENCE CHART
COUNTRIES OF CONCERN – UPDATED 04/10/2011**

COUNTRY OR TERRITORY	1. OFAC SANCTIONED	2. STATE SPONSOR OF TERRORISM	3. MAJOR MONEY LAUNDERING COUNTRY	4. TAX HAVENS	5. FATF AML/CFT & FINCEN	6. SECTION 311 ML CONCERNS	7. OTHER CONCERNS (SEE LEGEND)
Afghanistan (Taliban)			X				BP, ST
Aland Islands							IG
Alderney (Channel Islands)							IG
Andorra				IMF			IG
Angola (UNITA)					X		BP
Anguilla				IMF			IG
Antigua & Barbuda			X		X		IG
Argentina					X		IG, BMPE
Aruba				IMF			
Australia			X				IG
Austria			X				IG
Bahamas			X	IMF			IG
Balkans	X						BP
Bangladesh					X		
Belarus	X						BP
Belgium							IG
Belize			X	IMF			IG
Bermuda				IMF			
Bolivia			X		X		
Brazil			X				IG, BMPE
British Virgin Islands				IMF			
Burma (Myanmar)	X		X		X	X + Entities	BP
Cambodia			X				
Canada			X				
Caymen Islands			X	IMF			IG
Chile							IG
China			X				DF
Colombia			X				IG
Comoros							IG
Congo, Democratic Republic	X						BP
Cook Islands				IMF			IG
Costa Rica			X				IG
Côte d'Ivoire (Ivory Coast)	X						BP
Cuba	X	X					
Curacao							IG, DF
Cyprus			X	IMF			IG
Czech Republic							IG
Denmark							IG
Dominica							EC, IG
Dominican Republic			X				IG
Ecuador					X		
Egypt					FinCEN		
Estonia							IG
Ethiopia					X		
Finland							IG
France			X				IG
Germany			X				IG
Ghana					X		
Gibraltar				IMF			IG
Grand River Mohawk Lands							IG
Greece			X		X		
Grenada							IG
Guatemala			X				IG, BMPE
Guernsey (Channel Islands)			X	IMF			
Guinea -Bissau			X				
Haiti			X				
Honduras					X		
Hong Kong			X				DF
Hungary							IG
Hutt River Principality							IG
Iceland							IG
India			X				IG
Indonesia			X		X		
Iran	X	X	X		X & FinCEN		
Iraq	IRAQ2 & IRAQ3						
Ireland							IG

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Isle of Man (UK)			X	IMF			IG
Israel			X				IG
Italy			X				IG
Jamaica							IG
Japan			X				
Jersey (Channel Islands)			X	IMF			IG
Kahnawake (Canada)							IG
Kalmykia							IG
Kazakhstan							IG
Kenya			X		X		
Latvia			X			Entities	IG
Lebanon	X		X				
Liberia (Diamonds)	X						IG
Libya					FinCEN		
Liechtenstein			X	IMF			IG
Lithuania							IG
Luxembourg			X				IG
Macao SAR			X	IMF		Entities	IG
Malaysia				IMF			
Malta							IG
Mauritius							IG
Mexico			X				BMPE
Monaco				IMF			IG
Montserrat				IMF			
Morocco					X		
Myanmar (Burma)	X		X		X	X + Entities	BP
Nauru							SC
Nepal					X		IG
Netherlands			X				
Netherlands Antilles				IMF			IG
Nigeria			X		X		
Norfolk Island							IG
North Korea (DPRK)	X (1A)				X		IG
Norway							IG
Pakistan			X		X		
Palau				IMF			
Panama			X	IMF			IG, DF
Paraguay			X		X		BMPE
Philippines			X		X		IG
Poland							IG
Portugal							IG
Russian Federation			X				IG
Samoa				IMF			
Sao Tome' & Principe'					X		
Serbia							IG
Seychelles				IMF			IG
Singapore			X				IG
Slovakia							IG
Slovenia							IG
Solomon Islands							IG
South Africa							IG
South Korea							IG, DF
Spain			X				IG, DF
Sri Lanka					X		
St. Kitts & Nevis							EC, IG
St. Lucia							IG
St. Vincent & the Grenadines							IG
Sudan	X	X			X		BP
Swaziland							IG
Sweden							IG
Switzerland			X				IG
Syria	X	X			X	Entities	BP
Taiwan			X				IG
Tanzania					X		IG
Tasmania							IG
Thailand			X		X		

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Trinidad & Tobago					X		
Tunisia					FinCEN		
Turkey			X		X		
Turkmenistan					X		
Turks & Caicos				IMF			IG
Ukraine			X		X		
United Arab Emirates			X				
United Kingdom			X				IG
Uruguay			X				BMPE
US Virgin Islands							IG
Vanuatu				IMF			IG
Venezuela			X		X		IG, BMPE
Vietnam					X		IG
Yemen					X		
Zimbabwe	X		X				BP

Legend:

1. Office of Foreign Assets Control (OFAC) Sanctioned Countries www.treas.gov/ofac. **IRAQ2** = Assets of state bodies, corporations or agencies of former Government of Iraq blocked on or before 5/23/03, are to remain blocked, as described in Executive Order 13315 of 8/29/03. **IRAQ3** = Designation given to those with whom US persons may not trade under Executive Order 13438 (7/17/07), Persons who threaten stabilization efforts in Iraq.
- 1A. Effective June 27, 2008, sanctions under Trading With the Enemy Act are terminated. Certain sanctions remain under the International Emergency Economic Powers Act (IEEPA) and National Emergencies Act.
2. US Department of State Designation as State Sponsor of Terrorism www.state.gov/s/ct/c14151.htm.
3. US Department of State's Bureau for International Narcotics and Law Enforcement Affairs, March 2010 Major Money Laundering Countries (MMLC), <http://www.state.gov/p/inl/rls/nrcrpt/2010/vol2/index.htm>. Identification as a "major money laundering country" is based on whether the area's banks engage in transactions involving significant amounts of proceeds from serious crime. It is not based on an assessment of the area's legal framework to combat money laundering; its role in the terrorist financing problem; or the degree of its cooperation in the international fight against money laundering, including terrorist financing. There were no changes from 2009 to 2010.
- 4A. Organization for Economic Development Designation as Uncooperative Tax Haven (UTH) www.oecd.org. There are none as of May 2009.
- 4B. International Monetary Fund Offshore Financial Centers (IMF) www.imf.org/external/np/ofca/ofca.asp. Now integrated OFC assessment with the Financial Sector Assessment Program, a joint effort of IMF and the World Bank, www.imf.org/external/np/fsap/fsap.asp.
5. Financial Action Task Force (FATF) does not have any jurisdictions listed as Non-Cooperative Countries or Territories (NCCT) as of this update. The countries indicated above are identified as jurisdictions with strategic Anti-Money Laundering or Combating the Financing of Terrorism (AML/CFT) deficiencies. Refer to FinCEN Advisories FIN-2011-A006 and A005, FIN-2010-A013, A012, A010, A009, A003 and other FATF guidance. **FinCEN** designation indicates countries involved in recent events that elevate the risk of increased movement of assets or illicit finance threats.
6. USA PATRIOT Act Section 311 authorized the Secretary of the Treasury to designate jurisdictions of "primary money laundering concern". **Burma** - In addition to entire country concerns and sanctions, the Myanmar Mayflower Bank and the Asia Wealth Bank headquartered in Burma are specifically identified as ML concerns. **Entities** - VEF Banka headquartered in Latvia and Banco Delta Asia headquartered in Macao SAR have been identified as ML concerns. Commercial Bank of Syria, including Syrian Lebanese Commercial Bank owned by the Syrian government, is also of concern.
7. International Monetary Fund summary of OFC services last published March 2004 www.imf.org and the State Department's listing of OFC services at www.state.gov/p/inl/rls/nrcrpt/2003/vol2/html/29918.htm **EC**= Sells Economic Citizenship; **IG** = Internet Gaming; **ST** = Commit, threaten to commit, or support terrorism; **BP** - Blocked Property. To compile a comprehensive list of jurisdictions allowing Internet Gambling, several sources were consulted. The GAO Report to Congress on Internet Gambling, December 2002, www.gao.gov/new.items/d0389.pdf and the 2010 presentation by Dr. Robert Williams for the International Gambling Conference, Auckland, New Zealand, www.pgfnz.org.nz/Uploads/Conference/Presentations/Robert_Williams_2010_Internet_Gambling_NZ.pdf, as well as comprehensive lists found on www.casinocity.com, and <http://answers.google.com/answers/threadview/id/772198.html>. **BMPE** = Countries with Black Market Peso Exchange activity and **DF** = Duty free trade zones which may be used in trade-based money laundering as highlighted in FinCEN 2010-A001.

NOTE: For reference only in complying with BSA/AML regulations. Not legal advice.