

**CUSTOMER IDENTIFICATION PROGRAM QUICK REFERENCE CHART
COUNTRIES OF CONCERN – UPDATED 03/22/2009**

COUNTRY OR TERRITORY	1. OFAC SANCTIONED	2. STATE SPONSOR OF TERRORISM	3. MAJOR MONEY LAUNDERING COUNTRY	4. TAX HAVENS	5. FSF GROUP III OFC	6. SECTION 311 ML CONCERNS	7. OTHER TERRITORY (SEE LEGEND)
Afghanistan (Taliban)			X				BP, ST
Alderney							IG
Andorra				IMF, UTH			IG
Angola (UNITA)							BP
Anguilla				IMF	X		IG
Antigua & Barbuda			X		X		IG
Aruba				IMF	X		
Australia			X				
Austria			X				
Bahamas			X	IMF	X		IG
Balkans	X						BP
Belarus	X						BP
Belize			X	IMF	X		IG
Bermuda				IMF			
Bolivia			X				
Brazil			X				
British Virgin Islands				IMF	X		
Burma (Myanmar)	X		X			X + Entities	BP
Cambodia			X				
Canada			X				
Caymen Islands			X	IMF	X		IG
China			X				
Colombia			X				
Cook Islands				IMF	X		IG
Congo, Democratic Republic	X						BP
Costa Rica			X		X		IG
Côte d'Ivoire (Ivory Coast)	X						BP
Cuba	X	X					
Cyprus			X	IMF	X		IG
Dominica							EC, IG
Dominican Republic			X				
France			X				
Germany			X				
Gibraltar				IMF			IG
Greece			X				
Grenada							IG
Guatemala			X				IG
Guernsey (Channel Islands)			X	IMF			
Guinea -Bissau			X				
Haiti			X				
Hong Kong			X				
Hungary							IG
India			X				
Indonesia			X				
Iran	X	X	X				
Iraq	IRAQ2/IRAQ3						
Ireland							IG
Isle of Man (UK)			X	IMF			IG
Israel			X				
Italy			X				
Japan			X				
Jersey (Channel Islands)			X	IMF			
Kenya			X				
Latvia			X			Entities	
Lebanon			X		X		
Liberia (Diamonds)	X						IG
Liechtenstein			X	IMF, UTH	X		IG
Luxembourg			X				
Macao SAR			X	IMF		Entities	
Malaysia				IMF			
Marshall Islands					X		

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Mauritius					X		IG
Mexico			X				
Monaco				IMF, UTH			
Montserrat				IMF			
Nauru					X		EC, SC
Netherlands			X				
Netherlands Antilles				IMF	X		IG
Nigeria			X				
Niue					X		
North Korea	X (1A)						
Pakistan			X				
Palau				IMF			
Panama			X	IMF	X		IG
Paraguay			X				
Philippines			X				IG
Russian Federation			X				
Samoa				IMF	X		
Seychelles				IMF	X		IG
Singapore			X				
Spain			X				
St. Kitts & Nevis					X		IG
St. Lucia					X		IG
St. Vincent & the Grenadines					X		IG
Sudan	X	X					BP
Switzerland			X				
Syria	X	X				Entities	BP
Taiwan			X				
Thailand			X				
Turkey			X				
Turks & Caicos				IMF	X		IG
Ukraine			X				
United Arab Emirates			X				
United Kingdom			X				
Uruguay			X				
Vanuatu				IMF	X		IG
Venezuela			X				
Zimbabwe	X		X				BP

Legend:

1. Office of Foreign Assets Control (OFAC) Sanctioned Countries www.treas.gov/ofac. **IRAQ2** = The assets of state bodies, corporations or agencies of the former Government of Iraq that were blocked on or before May 23, 2003, are to remain blocked, as described in Executive Order 13315 of August 29, 2003. **IRAQ3** = Designation given to those with whom US persons may not trade under Executive Order 13438 (July 17, 2007), 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 2009 Major Money Laundering Countries (MLLC), <http://www.state.gov/p/inl/rls/nrcrpt/2009/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.
- 4A. Organization for Economic Development Designation as Uncooperative Tax Haven (UTH) www.oecd.org
- 4B. International Monetary Fund Offshore Financial Centers (IMF) www.imf.org/external/np/ofca/ofca.asp
5. Financial Stability Forum Designation as Group III Offshore Financial Center www.fsforum.org
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. http://www.fincen.gov/statutes_regs/patriot/section311.html
7. International Monetary Fund summary of OFC services last published March 2004 www.imf.org <http://www.state.gov/p/inl/rls/nrcrpt/2003/vol2/html/29918.htm> **EC**= Sells Economic Citizenship; **IG** = Internet Gaming; **SC** = Special Concern for Money Laundering; **ST** = Commit, threaten to commit, or support terrorism; **BP** - Blocked Property.

Footnote regarding NCCTs : As of this update, no countries or territories are designated by the Financial Action Task Force (FATF) as Non-Cooperative Countries or Territories (NCCT) www.fatf-gafi.org