

CUSTOMER IDENTIFICATION PROGRAM VERIFICATION DISCREPANCIES : RECOMMENDED ACCOUNT RESTRICTIONS

SCENARIO	CIP CUSTOMER	CUSTOMER ACTION		BANK ACTION	
		ACTION	TIMING	ACTION	TIMING
Any Customer	US Person or Non US Person	Present bank officials with an acceptable identification document.	At the customer's convenience.	Decline to open account until acceptable documents are presented.	At account request.
Attempt to Establish Any Bank Relationship	US Person or Non-US Person	Information presented to bank was incorrect or misleading.	At any point.	Resolve discrepancy or close the account with written adverse action notice (mailing address) to the customer.	Immediately upon confirming discrepancy and lack of resolution.
Multiple Owner Individual Account without all CIP Customers Present	All CIP Customers are US Persons	Return notarized ID document or missing documents to bank as requested for person(s) not present	1 week from account opening	Open account and tag as "pending." Do not add person not present to account until paperwork returned. Do not issue debit cards or fund loans until ID paperwork returned and verified.	Tag account immediately at opening for follow-up.
Multiple Owner Individual Account without all CIP Customers Present	CIP Customer(s) not present is a Non US Person	Return notarized ID document or missing documents to bank as requested for person(s) not present	1 week from initial contact requesting account.	Decline to open account until paperwork is returned and verified. Do not add person not present to account until paperwork returned.	Verify CIP ID information received. Place Reg CC holds.
US Entity with all CIP Customers not present.	All CIP Customers are US Persons	Return notarized ID document or entity records to bank as requested for person(s) not present	1 week from account opening	Open account and tag as "pending." Do not add person not present to account until paperwork returned. Do not issue debit cards until paperwork returned and verified.	Tag account immediately at opening for follow-up.
US Entity with all CIP Customers not present.	CIP Customer(s) not present is a Non US Person	Return notarized ID document or entity records to bank as requested for person(s) not present Provide ICE document supporting Non US Person status to work in USA.	1 week from account opening	Open account and tag it as "pending" Do not add person not present to account until paperwork returned. Do not issue debit cards until paperwork returned and verified.	Tag account immediately at opening for follow-up.
Non -US Entity with all CIP Customers not present.	CIP Customer(s) not present is Non US Person or a US Person	Customer must meet with bank officials with all required personnel representing the Non US Entity present.	At the customer's convenience.	Obtain info to begin verification. Decline to open the account until all required parties are present to be identified in person.	At account request.