

SAMPLEBANK
CIP IDENTIFICATION VERIFICATION RECOMMENDATIONS

Documentary Verification

- Review an available identification document (preferably a government issued photo ID) from the list of Acceptable Identification.
 - ▶ Examine the ID carefully! Compare signatures, addresses, spelling of name, and other data to information provided by the customer to ensure consistency.
 - ▶ Photo IDs should be examined using the guidelines detailed in BankersOnline's PLEASE system:
 - **P** - Picture, compare carefully to individual presenting ID
 - **L** - Logos / Holograms are found on the ID and locate the license number
 - **E** - Expiration Date, out of date means it is not a valid ID
 - **A** - Age, compare date of birth to the age of the individual presenting ID
 - **S** - Signature, compare ID signature to that on item presented
 - **E** - Evidence of Tampering, review carefully for possible alterations
- Compare identification document to current official samples included in the ID Checking Guide

Non-Documentary Verification

Note: If positive verification produces no record of the customer, the account shall not be opened, even if negative and logical verification show no problems.

Logical

- Address - determine if address is a mail drop site (mail box vendor, hotel or motel, prison, dormitory, etc.) using the Internet search engine on www.crimetime.com
- Address - locate the address using an Internet map feature (such as found on www.yahoo.com , www.mapquest.com , or www.ffiec.gov/geocode/default.htm) to determine if the address exists or use an reverse lookup website such as www.crimetime.com Black Book Online to determine the person or entity currently listed at the address.
- Telephone Number - Use a reverse lookup website such as www.crimetime.com Black Book Online to identify the person or entity currently tied to this telephone number. Cell phones or unlisted numbers will not be noted on this website.
- Out of Market - Does the customer live or operate in our geographical area? If not, why would the customer want an account with our institution?
- Social Security Number - Determine if the year and place of birth for the individual logically support the SSN provided by the customer using the Camel's Eye program or the website www.searchbug.com .

Positive

- Obtain a credit report from the bank's credit bureau vendor and compare information found on the report to the information provided by the customer (TIN, address, previous bank relationships, etc.) to identify potential discrepancies.
- Obtain UCC searches and real estate and judgment searches on the person or entity from the jurisdictions of residence or business operations.
- Contact the customer using the mailing or physical address, telephone number and/or e-mail address obtained from the customer.
- Verify business organizations and licensing via Internet sites such as www.searchsystems.net

Negative

- Request a bad check database report (ChexSystems, Telecheck, etc.) from the bank vendor to determine if the new customer is included in the database.
- Input the customer name into the bank's vendor for fraud database queries (E-Funds Fraud Finder, Bankers Systems' WatchDog, Bridger's Systems Guard Dog, etc.) to determine if the new customer is included in the database.

IMPORTANT NOTE! Contact the BSA Officer to determine if a Suspicious Activity Report should be filed for failure of any of the verification processes.

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.