

Form Completion Instructions: Certification of Beneficial Owners for Legal Entity Customers (COBO)

The **Certification of Beneficial Owners for Legal Entity Customers** (COBO) form is completed by the authorized person providing information on behalf of a legal entity with any of the following U.S. financial institutions: (i) 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.

These instructions will assist in the proper completion of this form. Snapshots of each section along with instructions on how to properly complete that section are available below.

1. General Instructions

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 the person providing information on behalf of a legal entity with any of the following U.S. financial institutions: (i) 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, statutory trust 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 trusts (excluding statutory trusts), estate accounts, attorney escrow accounts, sole proprietorships, unincorporated associations, natural persons opening accounts on their own behalf, or an account opened for the purpose of participating in an employee benefit plan established under the Employee Retirement Income Security Act of 1974 (ERISA). Any **legal entity** that is established as a charity, non-profit corporation or similar entity and has filed its organizational documents with the appropriate State authority as necessary does **not** need to complete **Section 4** of this form. Refer to **Section 6/Important Information** for additional information.

What information do I have to provide?

This form requires you to provide the name, address, date of birth and Social Security number (and additional information in the case of Non-U.S. Persons) for the following individuals (i.e., the beneficial owners):

- **Section 3** An individual with significant responsibility for managing the legal entity customer ("Control Person") (e.g., a Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice-President, or Treasurer); **and**
- **Section 4** Each individual, if any, who owns, directly or indirectly, 25% or more of the equity interests of the legal entity customer (e.g., each beneficial owner that owns 25% or more of the shares of a corporation).

The number of individuals that satisfy this definition of "beneficial owner" may vary. Under **Section 4**, 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 4**, you must provide the identifying information of one individual under **Section 3**. 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 30% equity interest). Thus, a completed form will contain the identifying information of one individual under **Section 3**, or up to five individuals (i.e., one individual under **Section 3** and four 25% equity holders under **Section 4**).

The financial institution may also ask to see a copy of a driver's license or other identifying document for each beneficial owner listed on this form.

- Review the **General Instructions**.

2. Information Regarding the Entity

Legal Entity's Exact Name (print)	Legal Entity's Taxpayer Identification #
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- Provide **Legal Entity's Exact Name** and **Legal Entity's Taxpayer Identification #**

3. Information Regarding One Control Person for the Entity

If appropriate, a beneficial owner listed under **Section 4** may also be listed in this section.

Individual's First Name (print)	Individual's Last Name (print)	Title Held of Individual
Individual's Social Security Number	Individual's Date of Birth	Individual's Residential City, State, Zip Code
Individual's Residential Street Address		Individual's Residential City, State, Zip Code
Citizenship: <input type="checkbox"/> U.S. Citizen <input type="checkbox"/> Resident Alien*		Country of Citizenship
* A copy of an unexpired green card with a photograph must be attached.		Document Type and Number

Note: if appropriate, a beneficial owner listed under **Section 4** may also be listed in this section.

- This is required to be completed with an individual with significant responsibility for managing the legal entity customer ("Control Person") (e.g., a Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice-President, or treasurer).
- Provide the following information:
 - **Individual's Name, Title Held of Individual, Individual's Social Security Number, Individual's Date of Birth and Individual's Residential Address**
 - **Citizenship**: Check the **Citizenship** status box.
 - If Resident Alien box is checked, document type and number as well as the country of citizenship must be provided.
 - To avoid delays, please make sure to submit a copy of an unexpired green card containing a photograph.

4. Information Regarding the Beneficial Owner(s)

The following information for **each** beneficial owner, if any, who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, owns 25% or more of the equity interests of the legal entity listed in **Section 2**:
 Check here if no individual meets this definition. Proceed to **Section 5**.

<p>#1</p> <p>Beneficial Owner's First Name (print) Beneficial Owner's Last Name (print)</p> <p>Beneficial Owner's Residential Street Address</p> <p>Beneficial Owner's City, State, Zip Code</p> <p>Beneficial Owner's Social Security # Beneficial Owner's Date of Birth</p> <p>Citizenship: <input type="checkbox"/> U.S. Citizen <input type="checkbox"/> Resident Alien*</p> <p>* A copy of an unexpired green card with a photograph must be attached.</p> <p>Document Type and Number Country of Citizenship</p>	<p>#2</p> <p>Beneficial Owner's First Name (print) Beneficial Owner's Last Name (print)</p> <p>Beneficial Owner's Residential Street Address</p> <p>Beneficial Owner's City, State, Zip Code</p> <p>Beneficial Owner's Social Security # Beneficial Owner's Date of Birth</p> <p>Citizenship: <input type="checkbox"/> U.S. Citizen <input type="checkbox"/> Resident Alien*</p> <p>* A copy of an unexpired green card with a photograph must be attached.</p> <p>Document Type and Number Country of Citizenship</p>
<p>#3</p> <p>Beneficial Owner's First Name (print) Beneficial Owner's Last Name (print)</p> <p>Beneficial Owner's Residential Street Address</p> <p>Beneficial Owner's City, State, Zip Code</p> <p>Beneficial Owner's Social Security # Beneficial Owner's Date of Birth</p> <p>Citizenship: <input type="checkbox"/> U.S. Citizen <input type="checkbox"/> Resident Alien*</p> <p>* A copy of an unexpired green card with a photograph must be attached.</p> <p>Document Type and Number Country of Citizenship</p>	<p>#4</p> <p>Beneficial Owner's First Name (print) Beneficial Owner's Last Name (print)</p> <p>Beneficial Owner's Residential Street Address</p> <p>Beneficial Owner's City, State, Zip Code</p> <p>Beneficial Owner's Social Security # Beneficial Owner's Date of Birth</p> <p>Citizenship: <input type="checkbox"/> U.S. Citizen <input type="checkbox"/> Resident Alien*</p> <p>* A copy of an unexpired green card with a photograph must be attached.</p> <p>Document Type and Number Country of Citizenship</p>

The section is only completed for each beneficial owner, if any, who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, owns 25% or more of the equity interests of the legal entity listed in **Section 2**.

- Check the box at the top of the section if no individual meets the above definition and Proceed to **Section 5**.
- For any individual that meets the above definition provide the following information:
 - **Beneficial Owner's Name, Beneficial Owner's Residential Address, Beneficial Owner's Social Security Number and Beneficial Owner's Date of Birth**
 - **Citizenship:** Check the **Citizenship** status box.
 - If Resident Alien box is checked, document type and number as well as the country of citizenship must be provided.
 - To avoid delays, please make sure to submit a copy of an unexpired green card containing a photograph.

5. Certification of Authorized Person

I am an Authorized Person of the legal entity named in **Section 2** of this form and hereby certify, to the best of my knowledge, that the information provided on this form is complete and correct.

 Authorized Person's First Name (print) Authorized Person's Last Name (print) Signature of Authorized Person Date

In this section provide the name of the Authorized Person of the legal entity named in Section 2 who will certify that the information on this form is complete and correct.

- Provide **Authorized Person's Name** and **Signature**

6. Important Information

Exceptions and Exclusions to the Certification of Beneficial Owners for Legal Entity Customers form:

The following legal entity customers are subject only to **Section 3/Information Regarding One Control Person for the Entity** of this form:

- A pooled investment vehicle that is operated or advised by a financial institution **and** included in the below list of Exclusions (such as hedge funds and private equity funds).
- Any legal entity that is established as a charity, non-profit corporation or similar entity and has filed its organizational documents with the appropriate State authority as necessary.

The following types of Entities are **not required** to complete a **Certification of Beneficial Owners for Legal Entity Customers** form:

Exclusions:

- Trusts - (A Statutory Trust created by a filing with a Secretary of State or similar office is not an exclusion and a Certification of Beneficial Owners for Legal Entity Customers form must be completed.)
- Estate Accounts.
- Attorney Escrow Accounts and client trust accounts.
- Sole Proprietorship Accounts.
- Unincorporated associations (such as scout troops and youth sports leagues).
- Natural persons opening accounts on their own behalf.
- An account opened for the purpose of participating in an employee benefit plan established under the Employee Retirement Income Security Act of 1974 (ERISA).
- A financial institution regulated by a Federal functional regulator or a bank regulated by a State bank regulator.
- A department or agency of the federal, state, or local government.
- Any entity established under the laws of the United States, of any State, or of any political subdivision of any State, or under an interstate compact between two or more States, that exercises governmental authority on behalf of the United States or of any such State or political subdivision.
- Any entity (other than a bank) whose common stock or analogous equity interests are listed on the New York, American, or NASDAQ stock exchange.
- Any subsidiary of an entity listed on one of the stock exchanges and whose common stock is owned (at least 51%) by the listed entity.
- An issuer of a class of securities registered under section 12 of the Securities Exchange Act of 1934 or that is required to file reports under section 15(d) of that Act.
- An investment company, as defined in section 3 of the Investment Company Act of 1940, that is registered with the Securities and Exchange Commission ("SEC") under that Act.
- An investment adviser, as defined in section 202(a)(11) of the Investment Advisers Act of 1940, that is registered with the SEC under that Act.
- An exchange or clearing agency, as defined in section 3 of the Securities Exchange Act of 1934, that is registered under section 6 or 17A of that Act.
- Any other entity registered with the SEC under the Securities and Exchange Act of 1934.
- An entity defined in section 1a of the Commodity Exchange Act, that is registered with the Commodity Futures Trading Commission.
- A public accounting firm registered under section 102 of the Sarbanes-Oxley Act.
- A bank holding company, as defined in section 2 of the Bank Holding Company Act of 1956 (12 U.S.C. 1841), or savings and loan holding company, as defined in section 10(n) of the Home Owners' Loan Act (12 U.S.C. 1467a(n)).
- An insurance company that is regulated by a State.
- A financial market utility designated by the Financial Stability Oversight Council under Title VIII of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.
- A foreign financial institution established in a jurisdiction where the regulator of such institution maintains beneficial ownership information regarding such institution.
- A non-U.S. governmental department, agency or political subdivision that engages only in governmental rather than commercial activities.
- A pooled investment vehicle that is operated or advised by a financial institution excluded under the above entities.

- Review the **Important Information**.