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FinCEN Customer Due Diligence Beneficial Ownership Rules

New system functionality has been created to help you comply with new procedures mandated by the United States Department of the Treasury Financial Crimes Enforcement Network (FinCEN).

Fields added at the customer level to identify legal entities and beneficial owners.

End-of-Year 2017 enhancement.



Note

- The United States Department of the Treasury Financial Crimes Enforcement Network (FinCEN) has created new regulatory procedures as part of their anti-money laundering compliance program.
- Covered institutions are required to establish and maintain written procedures reasonably designed to identify and verify the identities of beneficial owners of legal entity customers, which are subject to certain exclusions and exemptions.



What is a Legal Entity?

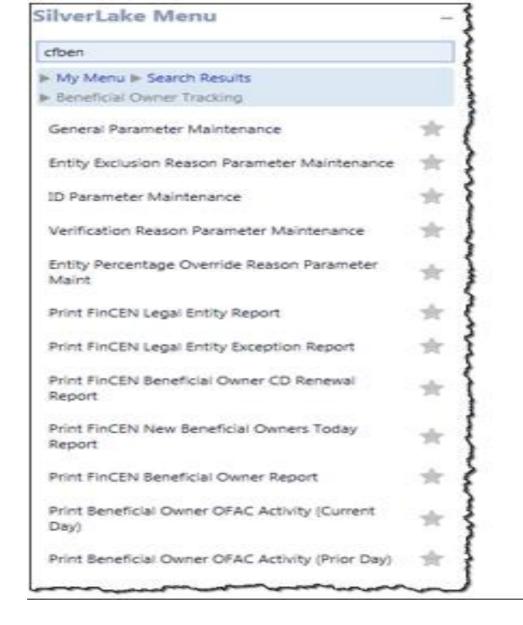
- Examples include:
 - Corporations
 - Limited-liability companies
 - Limited partnerships
 - General partnerships
 - Business trusts
 - Any other entity created by a filing with a state office, or any other entity created in this way
 - Similar entities formed under the laws of other countries



What is a Beneficial Owner?

 An individual who owns 25 percent or more of the equity interest of a legal entity, or an individual who has significant responsibility to control, manage, or direct a legal entity.

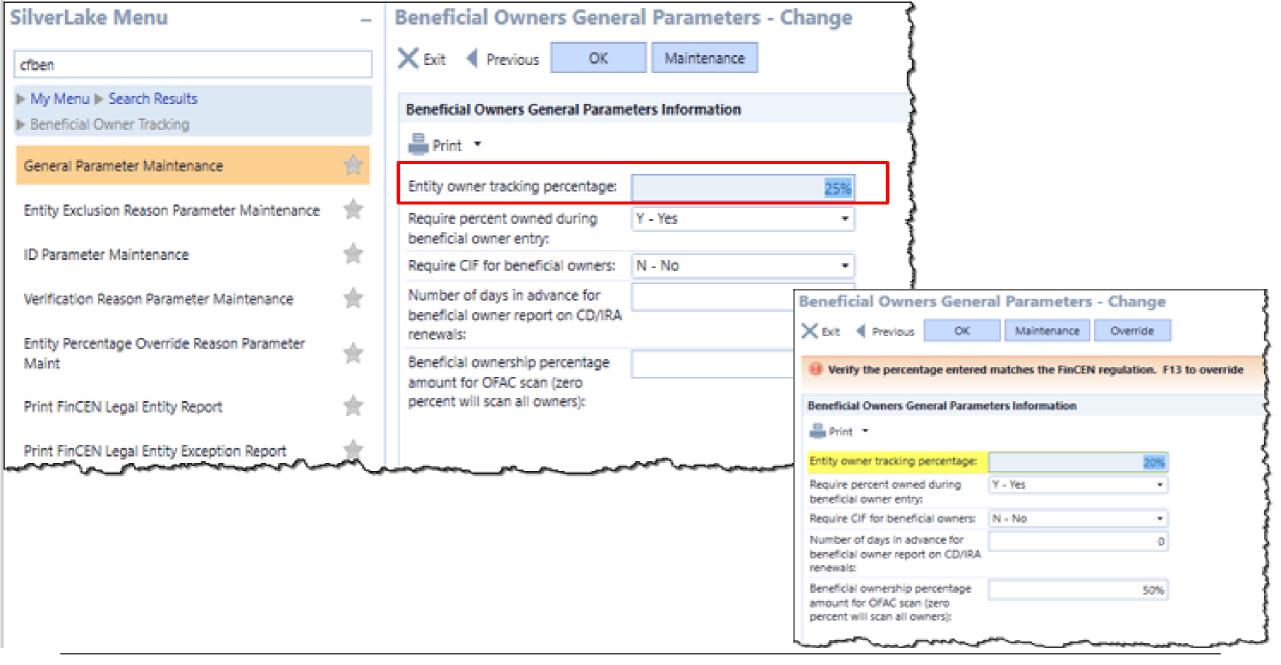




SilverLake Menu cfbeno My Menu ► Search Results Beneficial Owner Tracking General Parameter Maintenance Entity Exclusion Reason Parameter Maintenance ID Parameter Maintenance Verification Reason Parameter Maintenance Entity Percentage Override Reason Parameter Maint

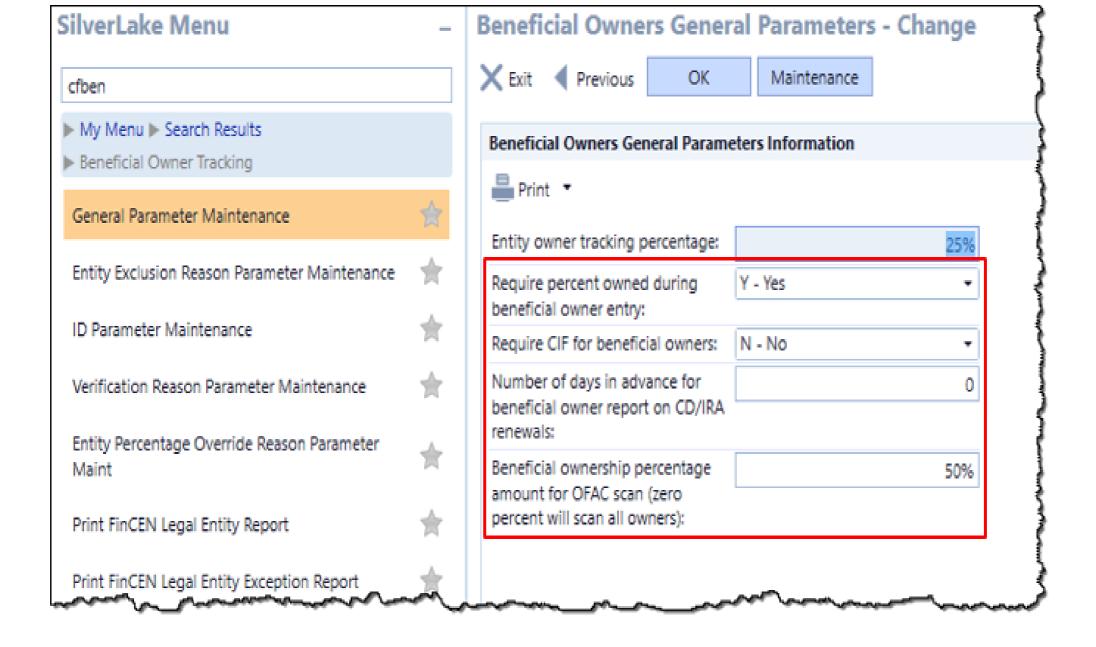


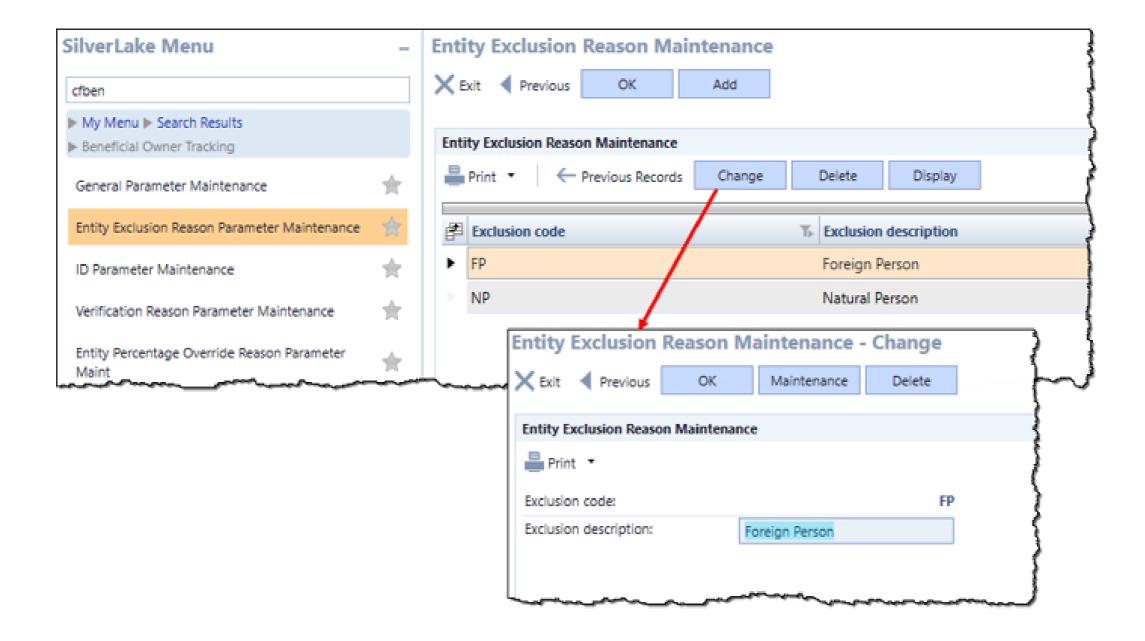




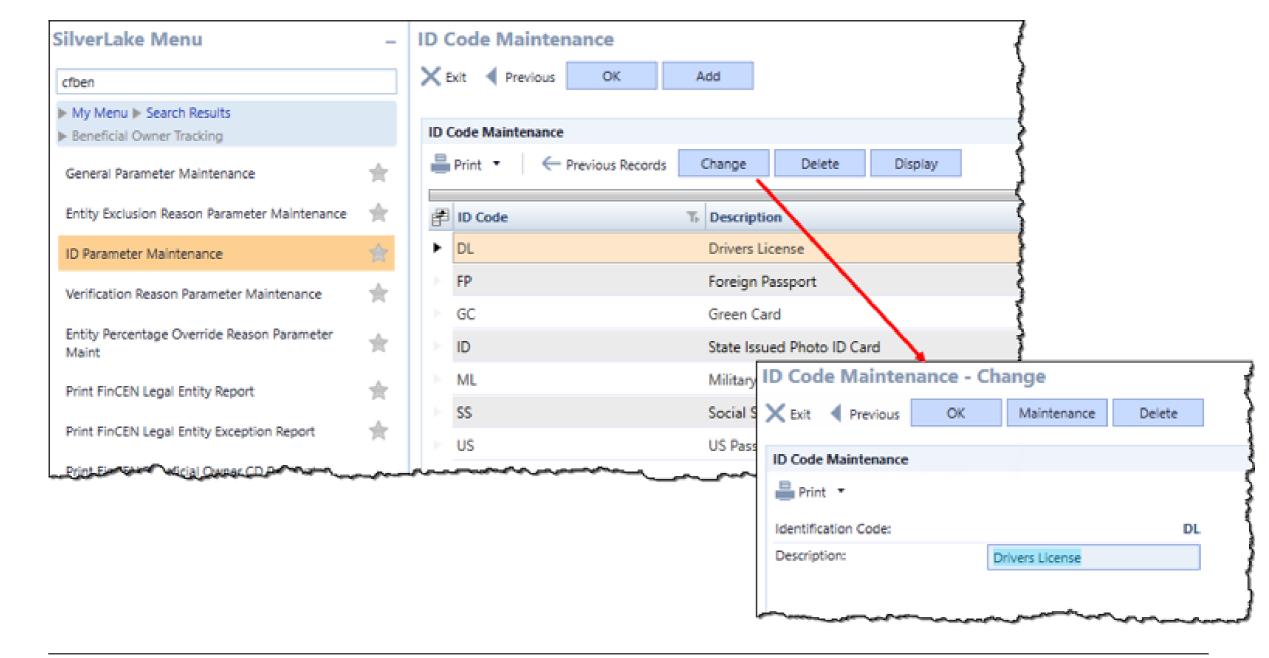






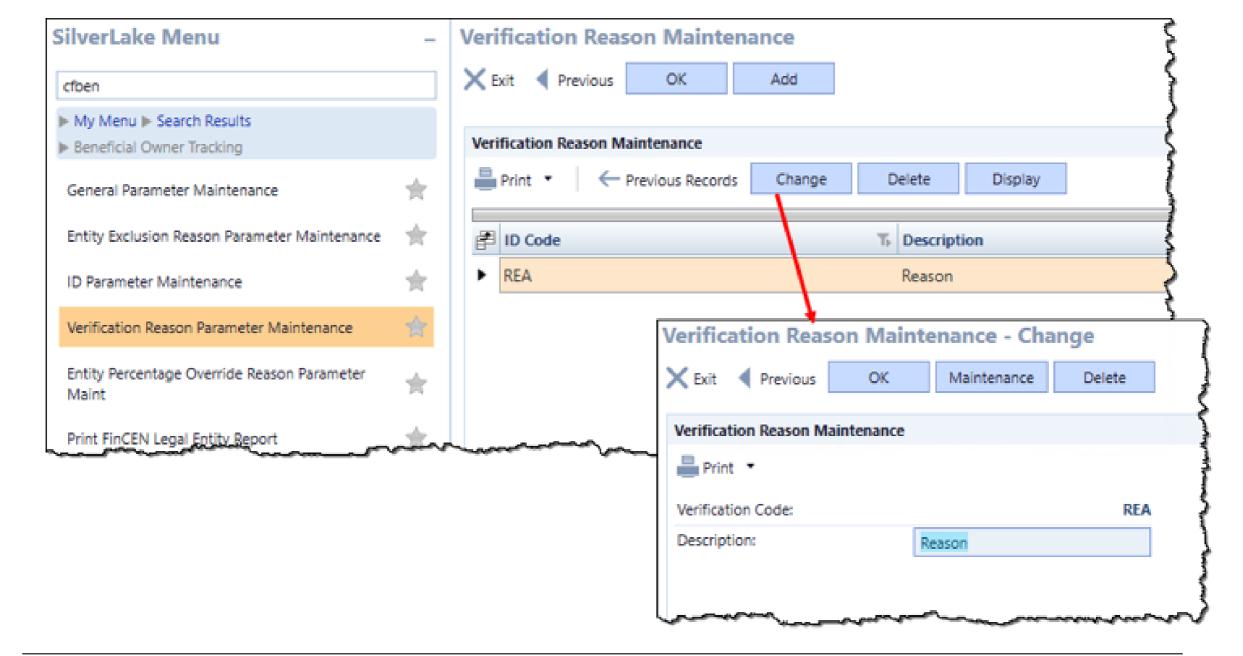




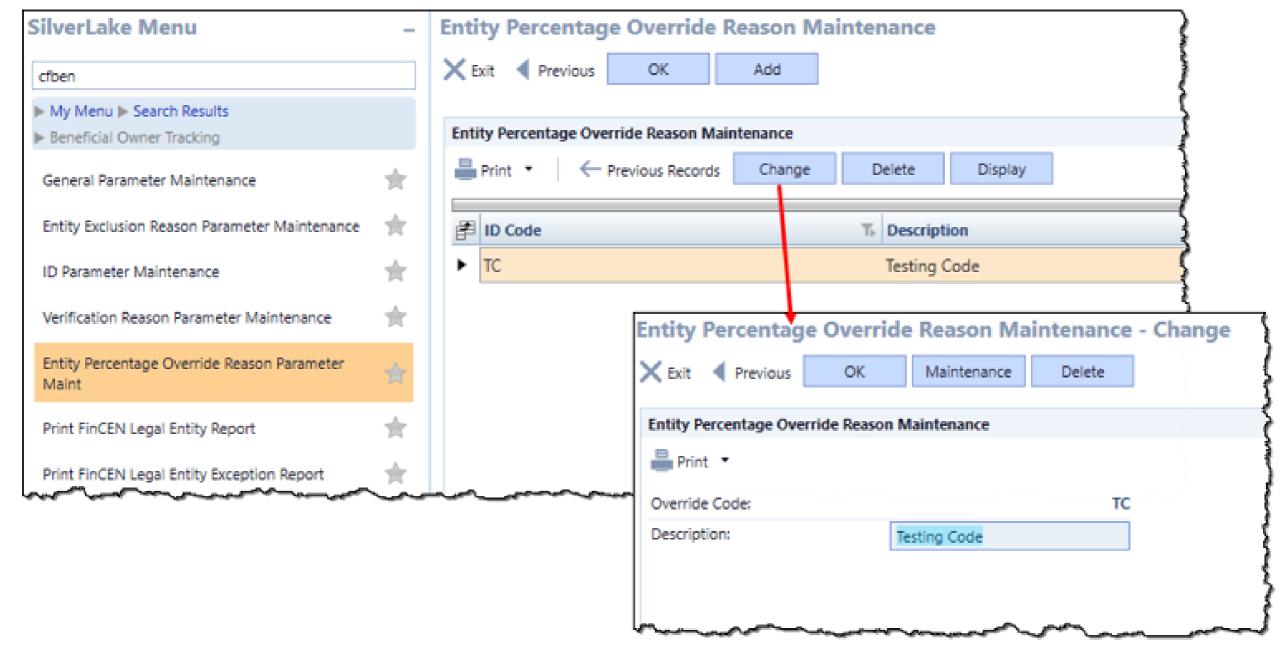






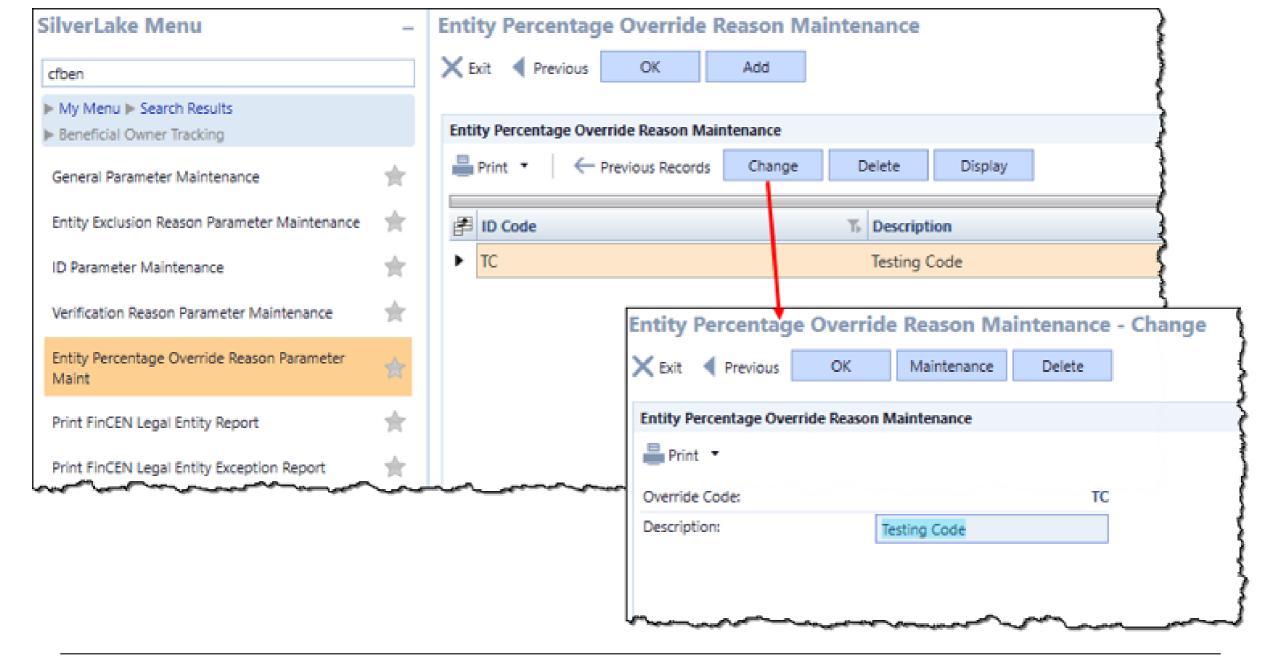








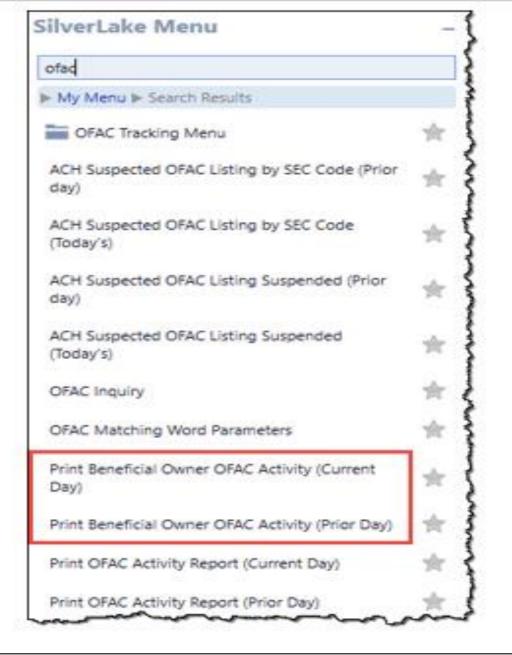






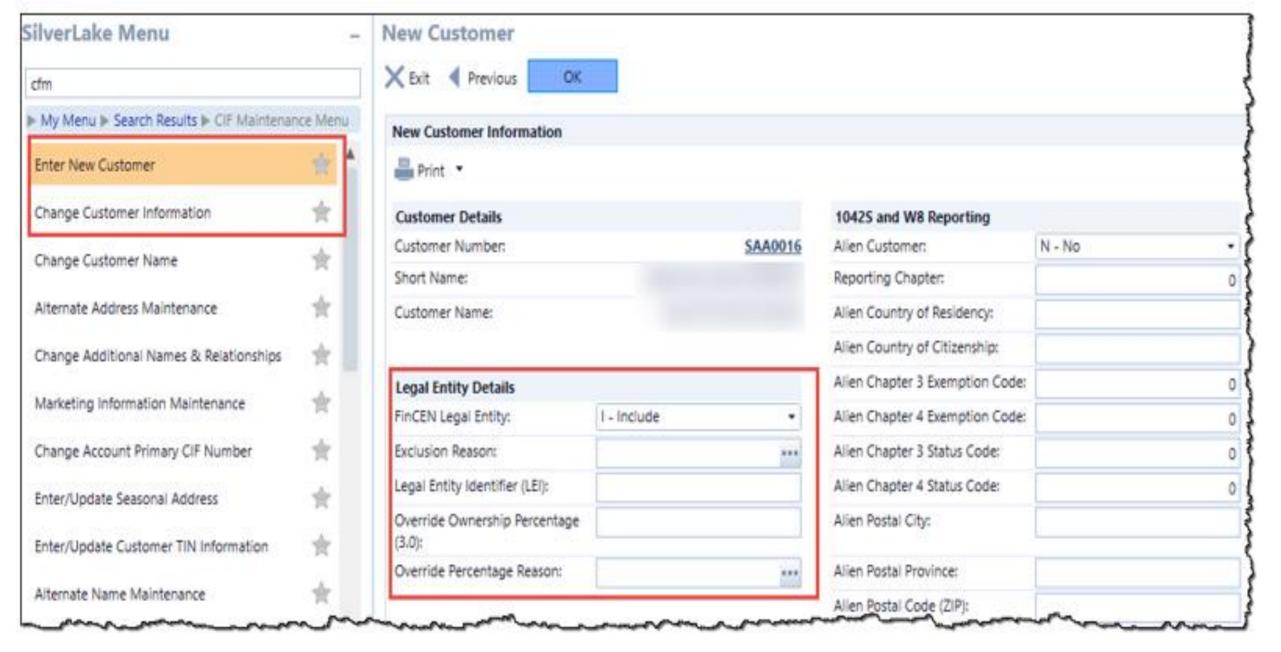










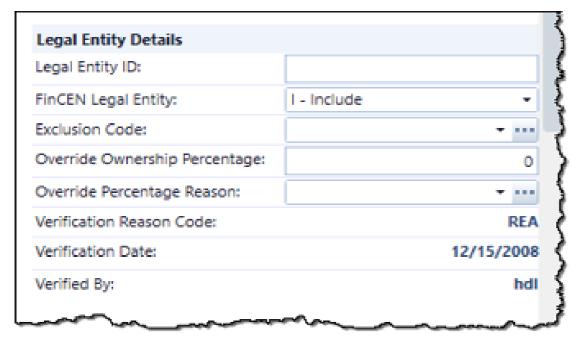






Existing Customers

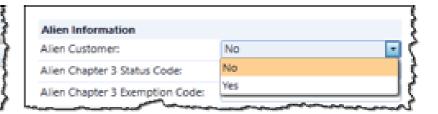
Non-Individual Customers



Individual Customers

Legal Entity Details		
Legal Entity ID:		
FinCEN Legal Entity:	E - Exclude	-
Exclusion Code:	NP - Natural Person	Ŧ
Override Ownership Percentage:		0
Override Percentage Reason:		Ŧ
Verification Reason Code:		
Verification Date:		









May 11, 2018

- Beginning May 11, 2018, you must begin tracking legal entity and beneficial owner information.
- You can choose to override and not enter beneficial owner information; however, after May 11, 2018 if you override you will not be compliant with the regulations.



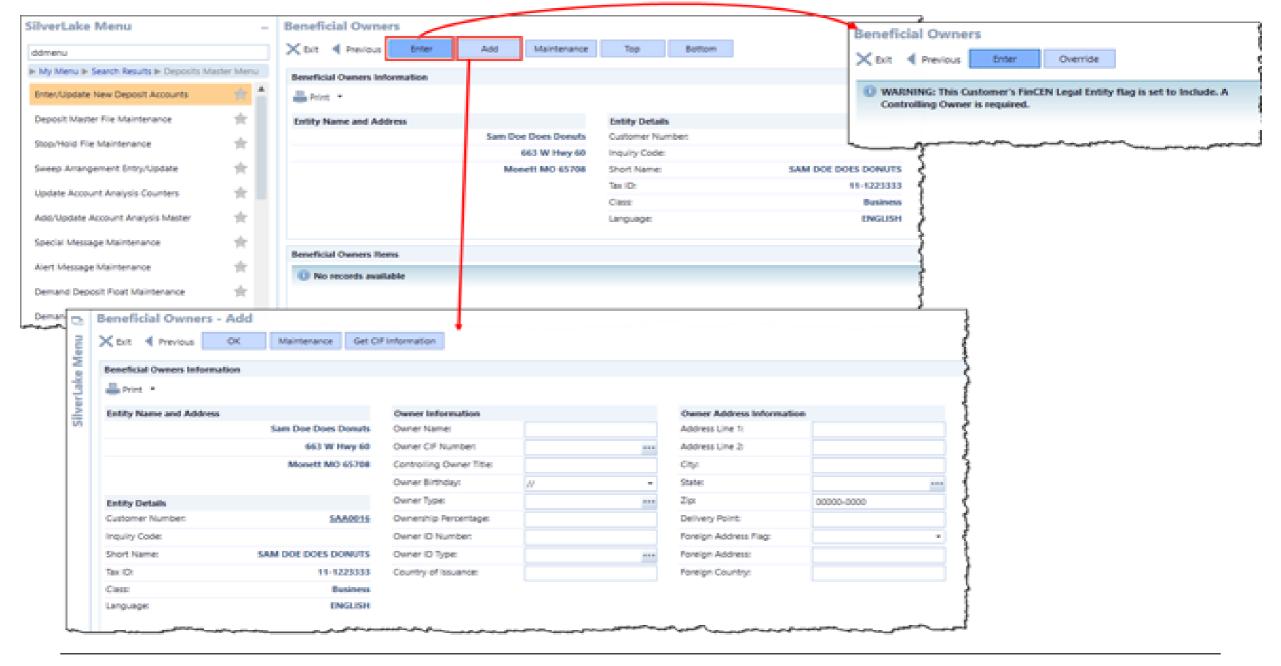


Account Types

- Credit Lines
- Demand Deposit Accounts
- Lease Security Accounts
- Loans
- Loan Renewals
- Safe Deposit Box Accounts
- Shareholder Accounts
- Time Deposit Accounts

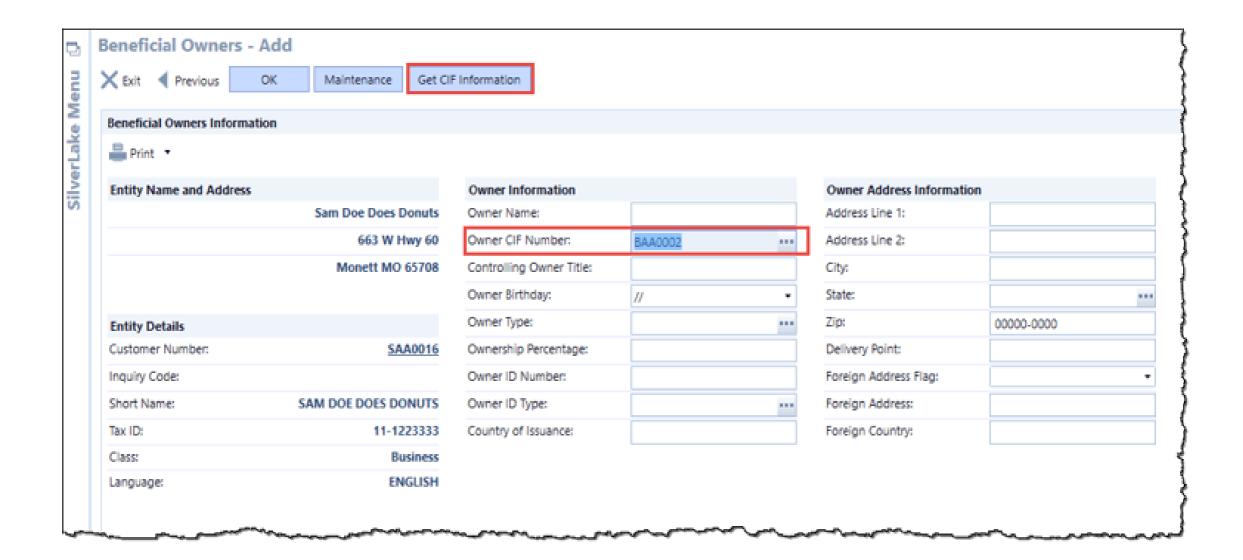






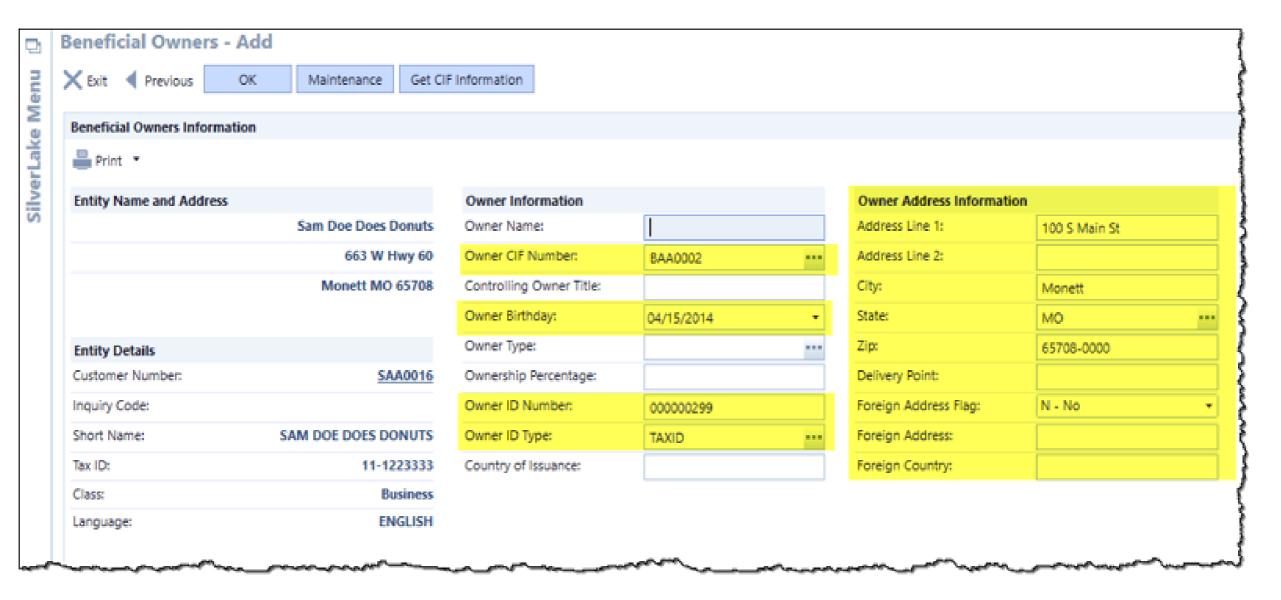






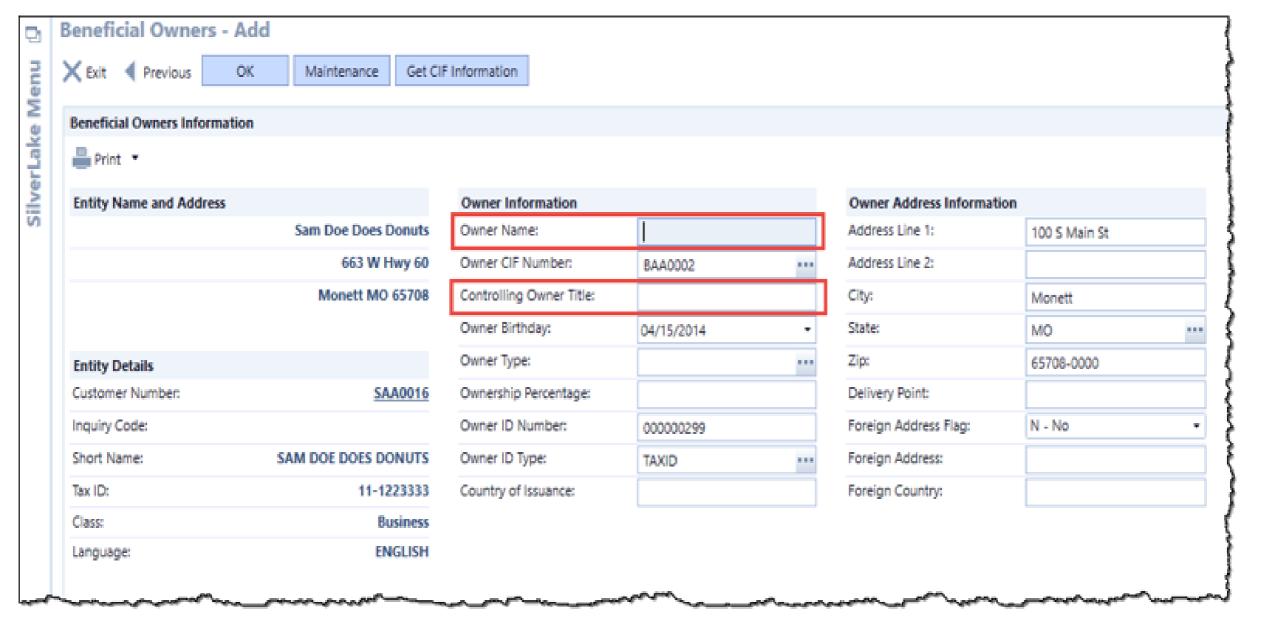






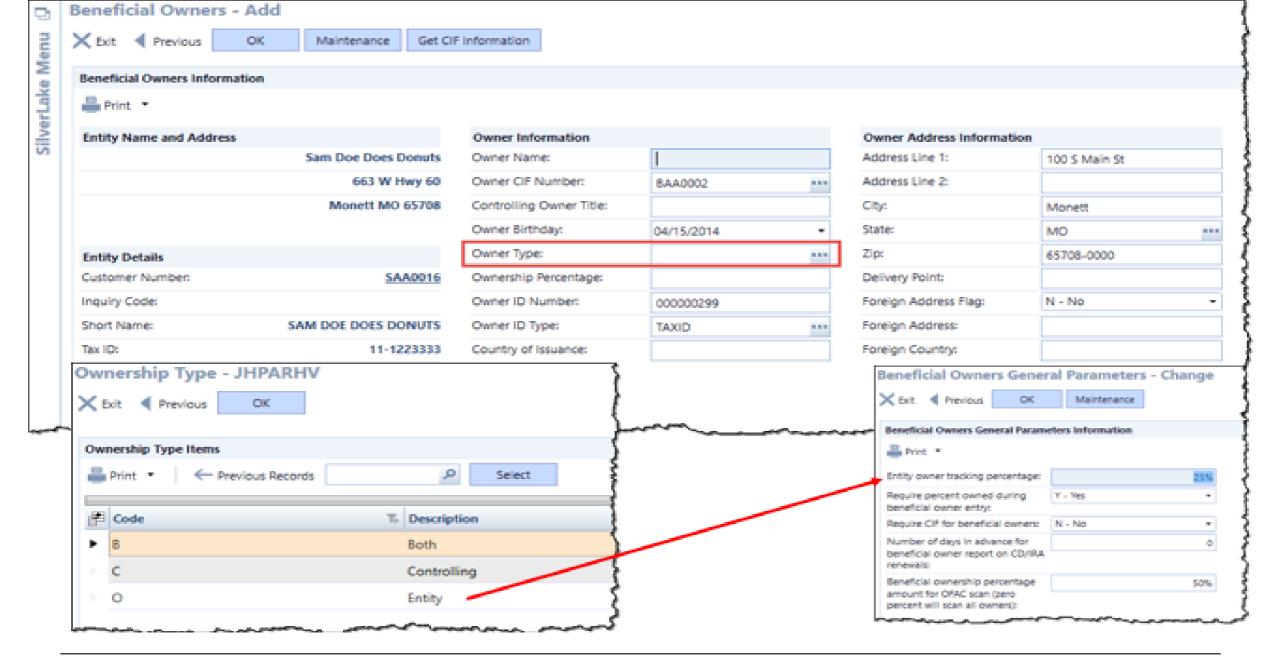




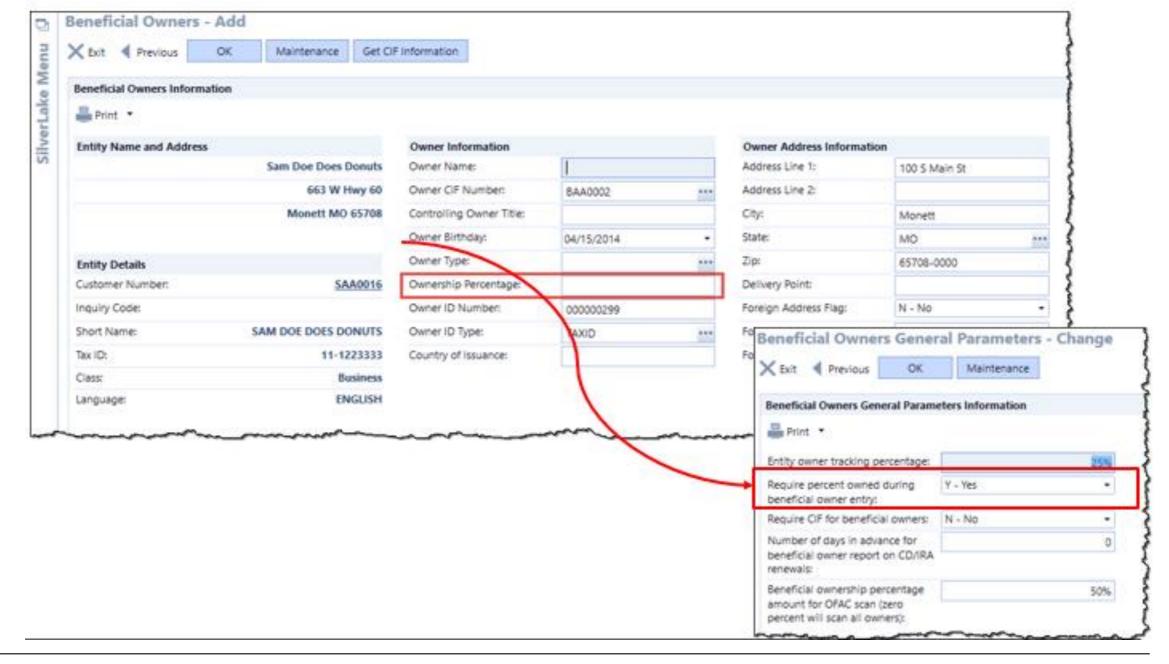






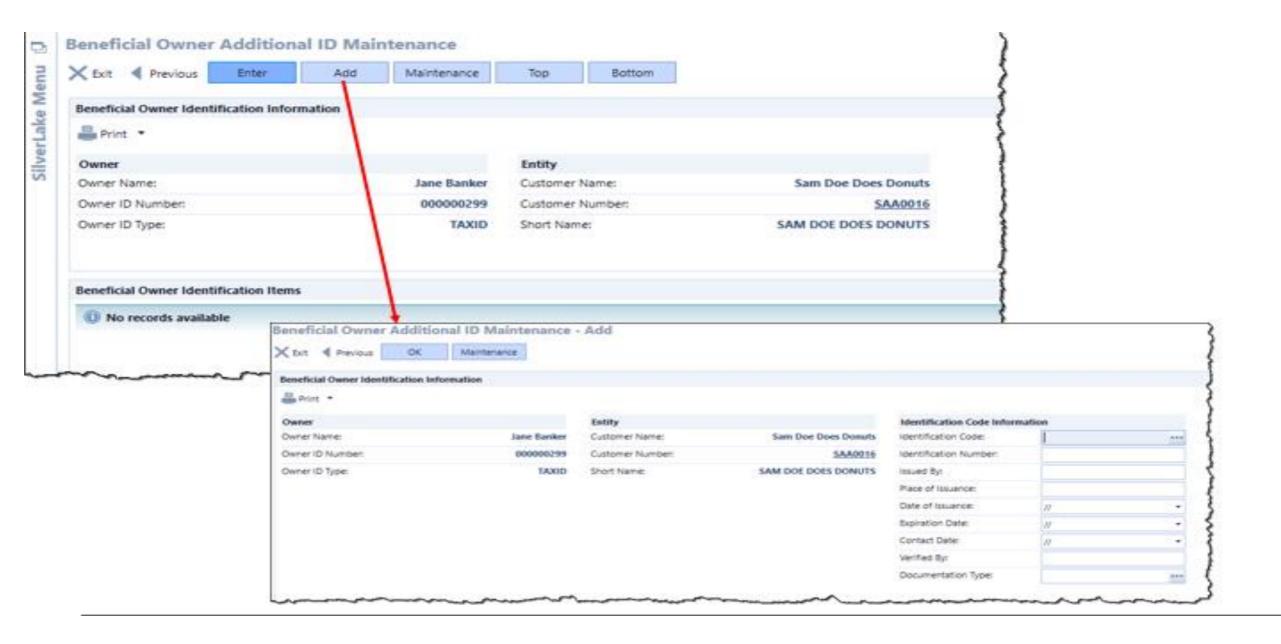






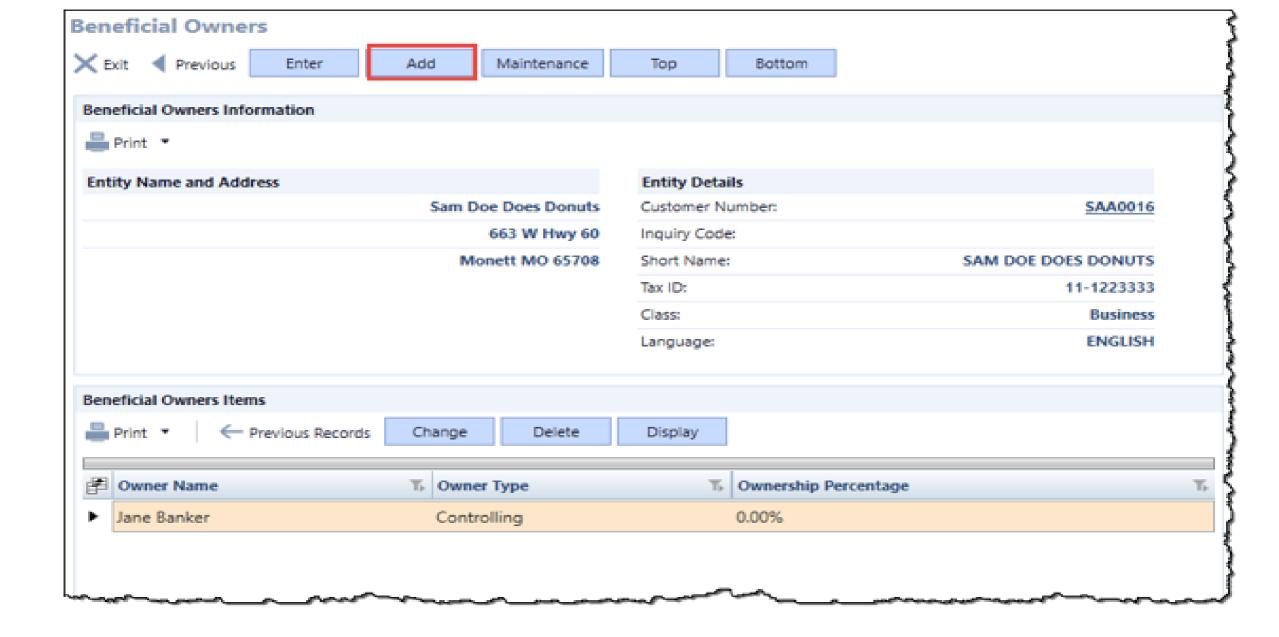






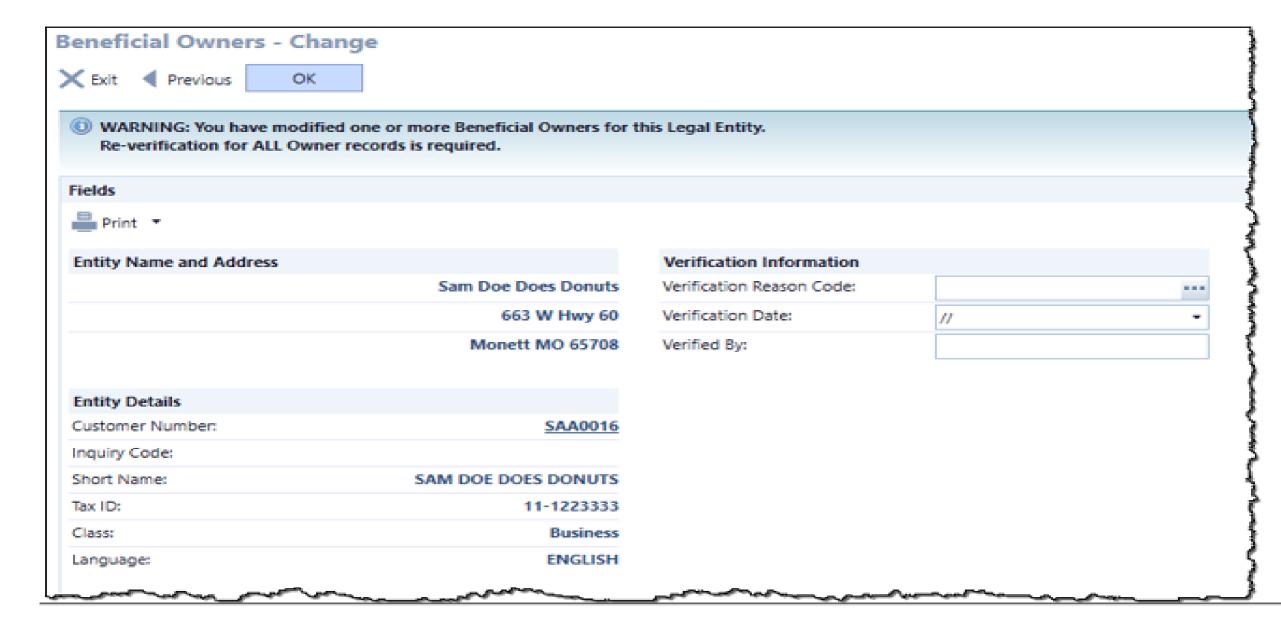






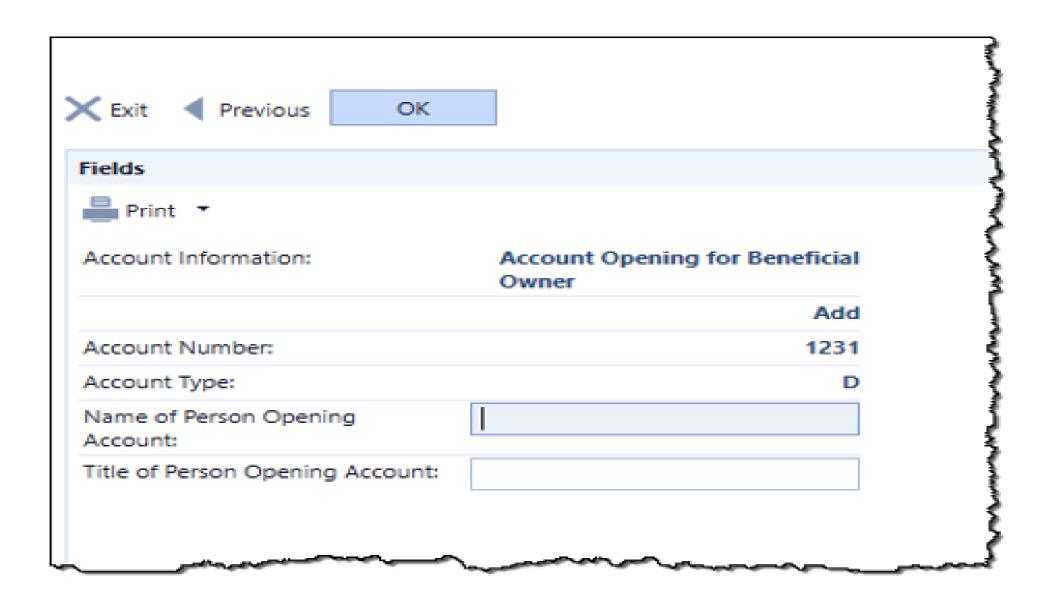


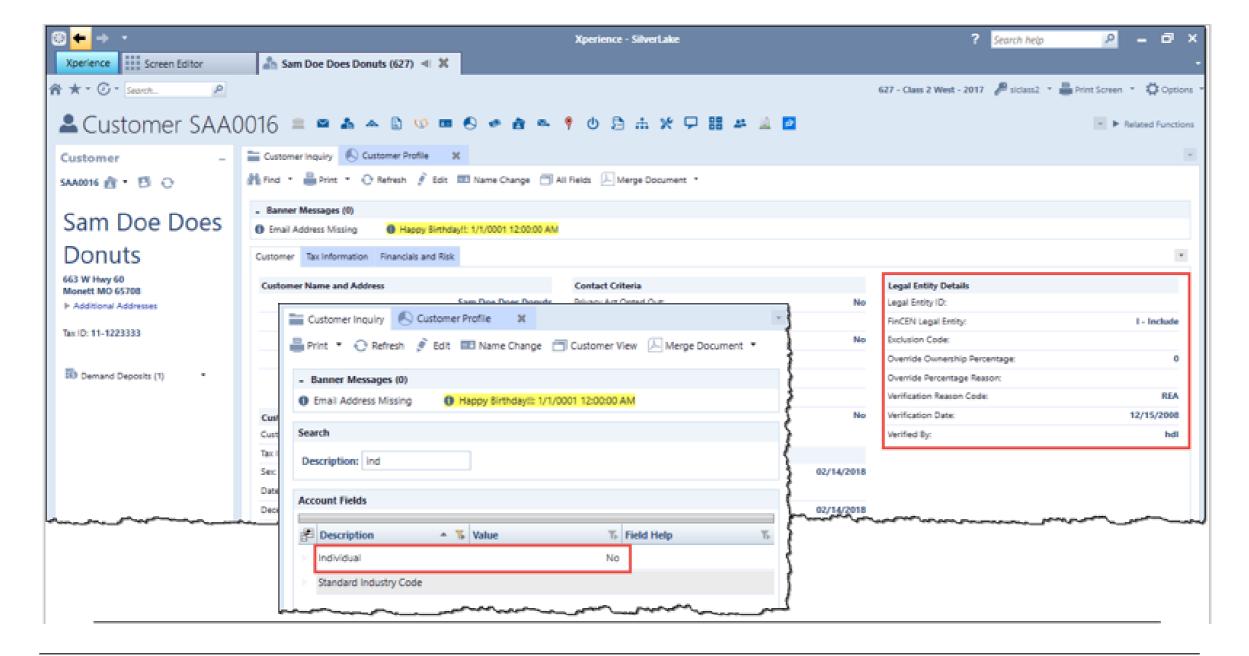






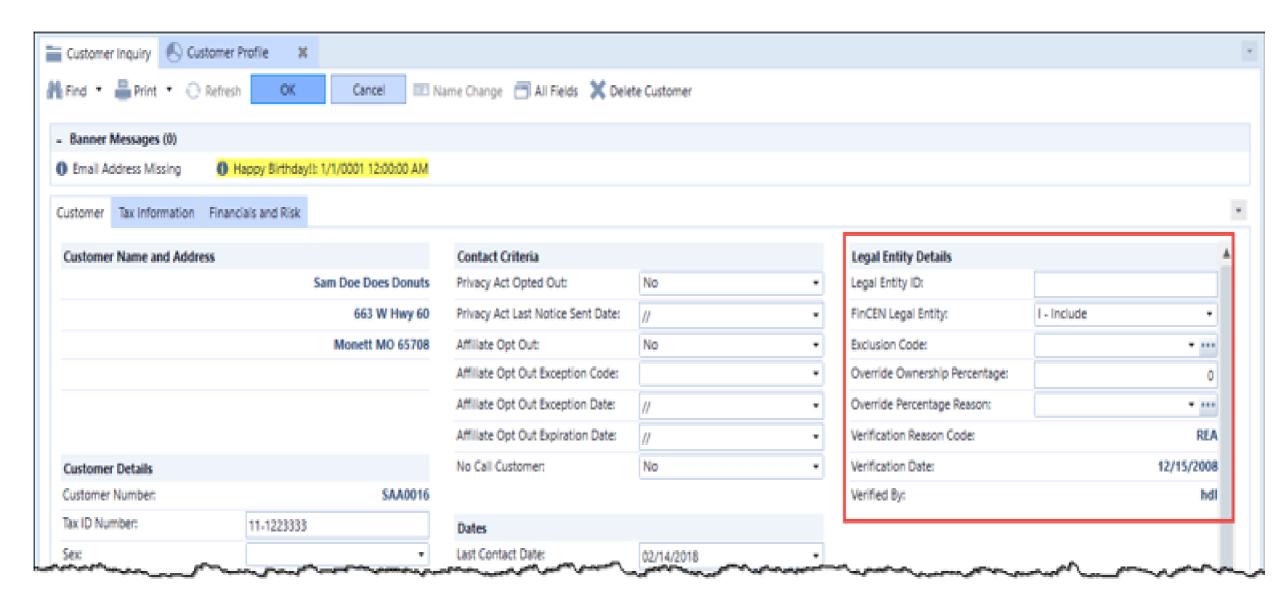




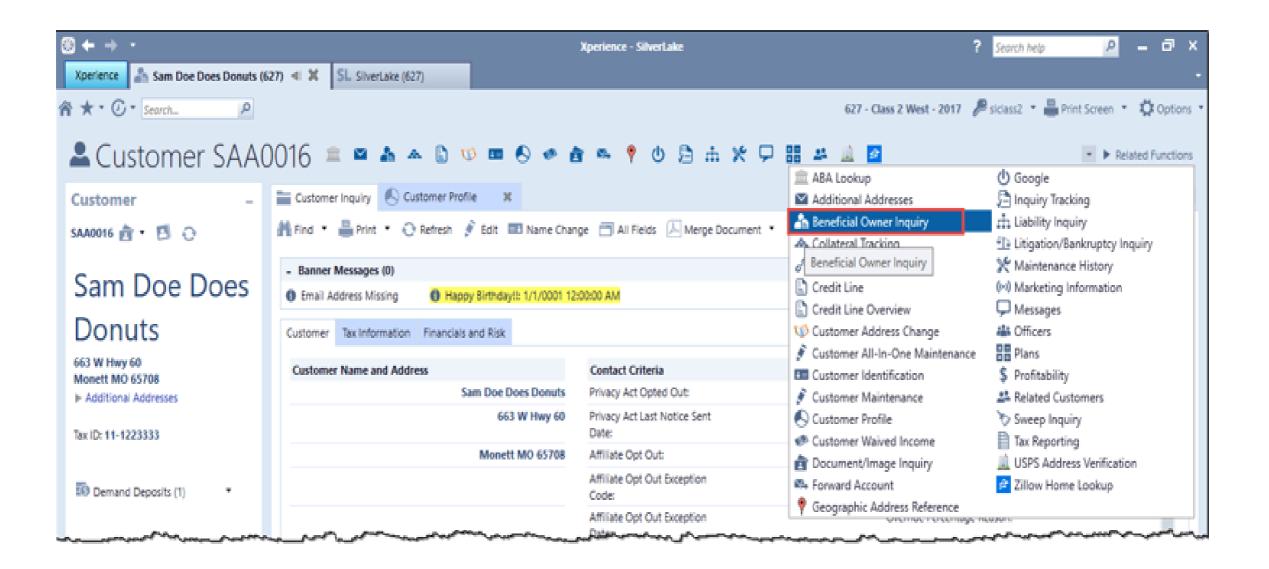


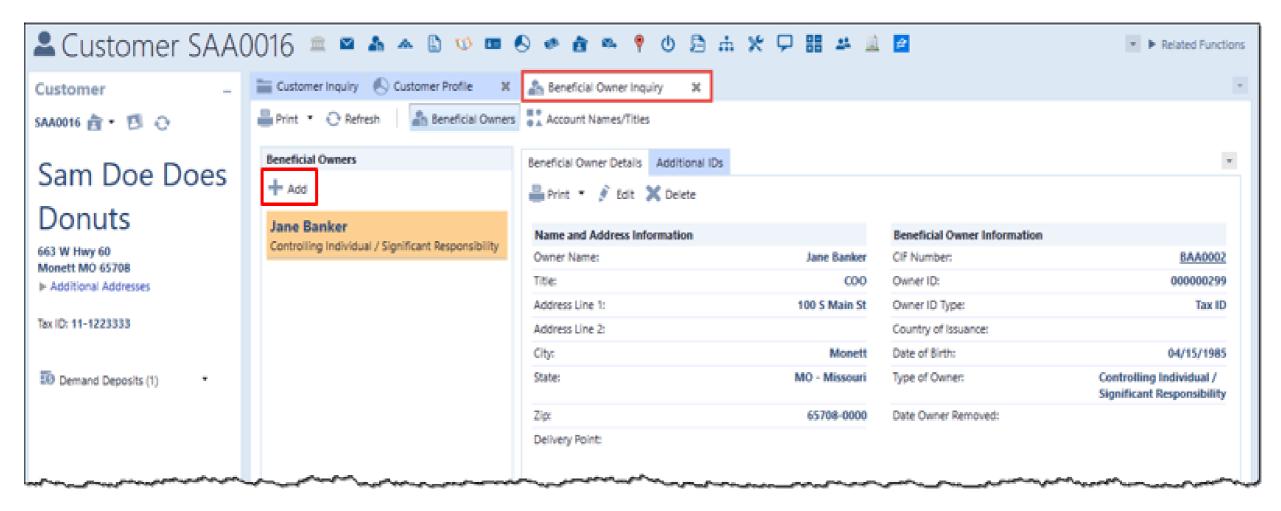


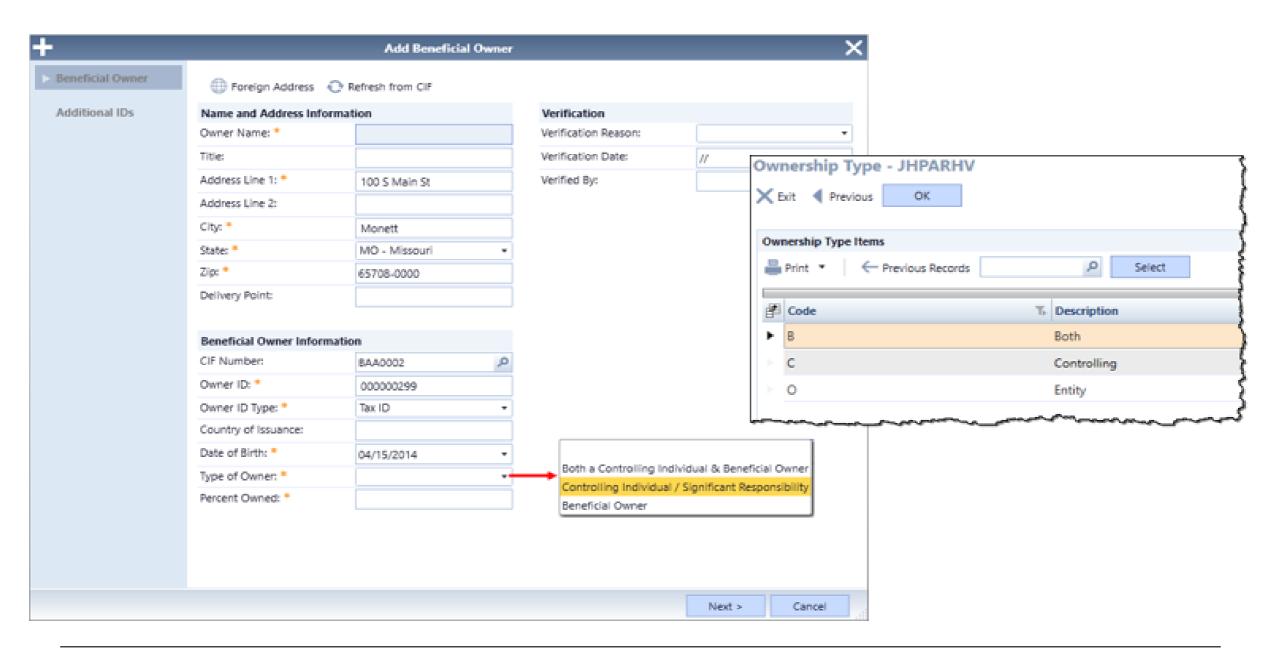








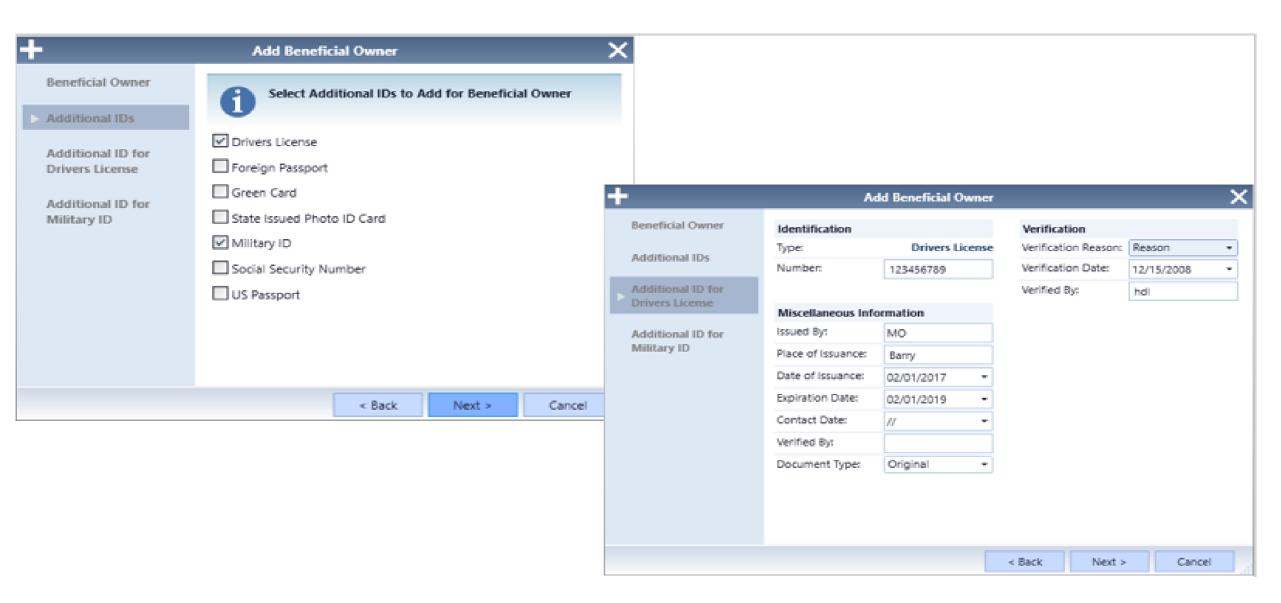






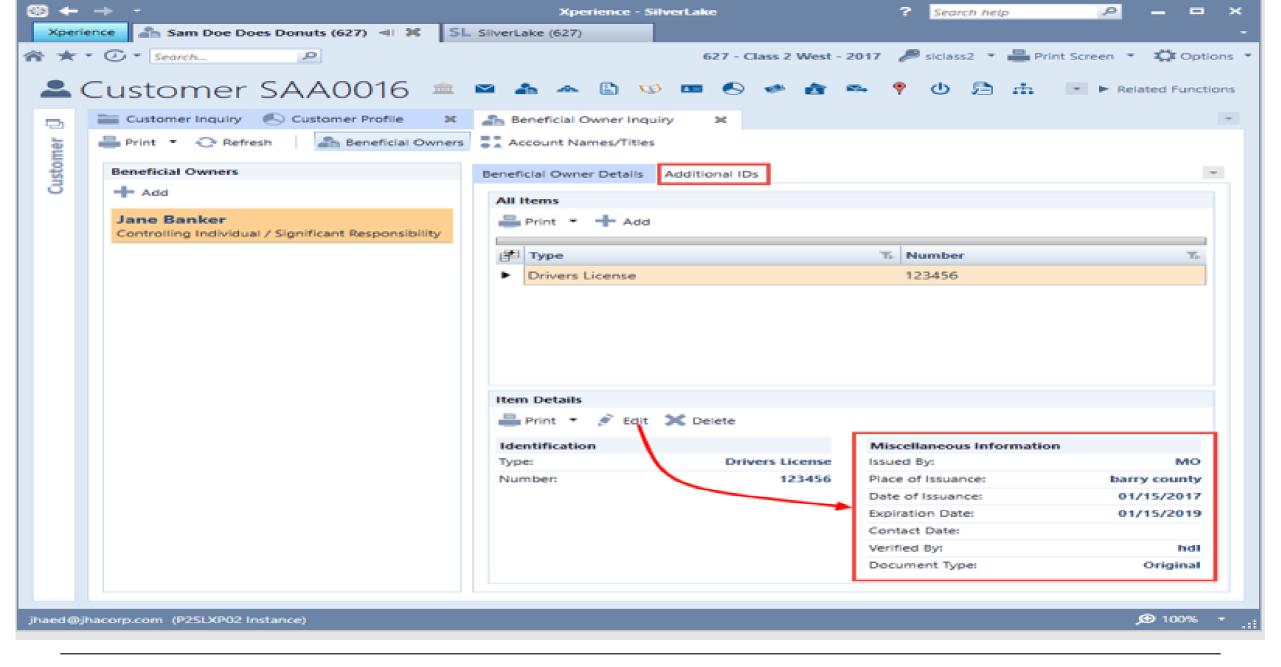






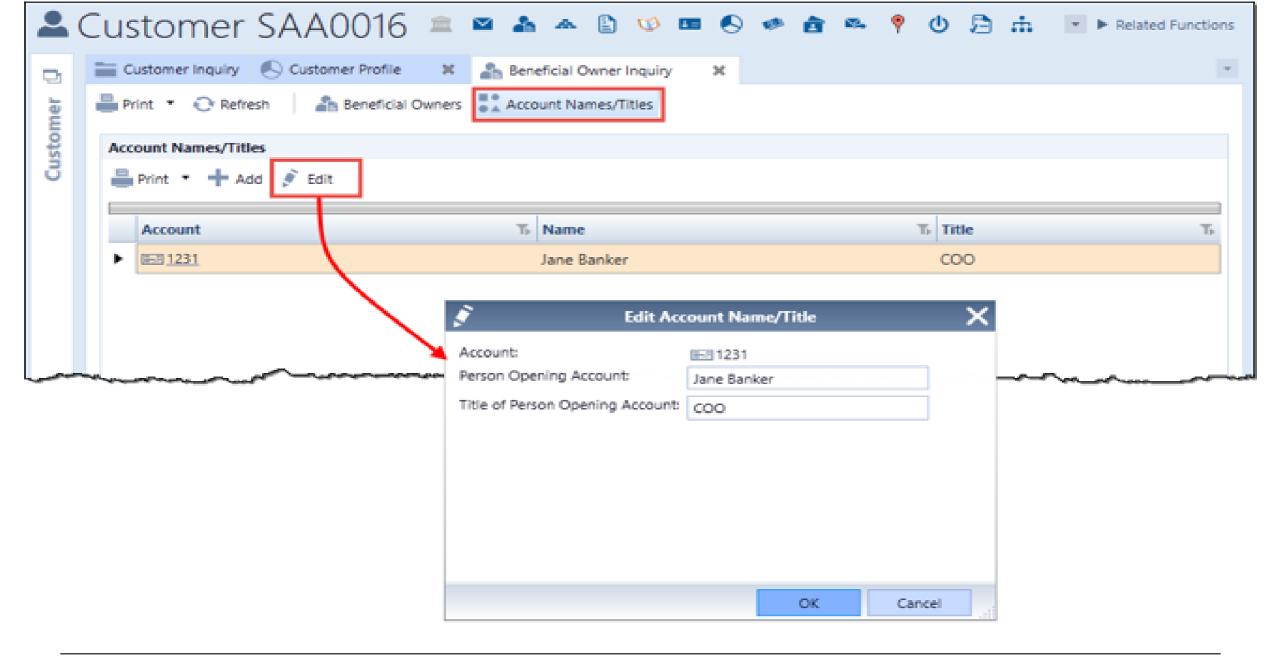


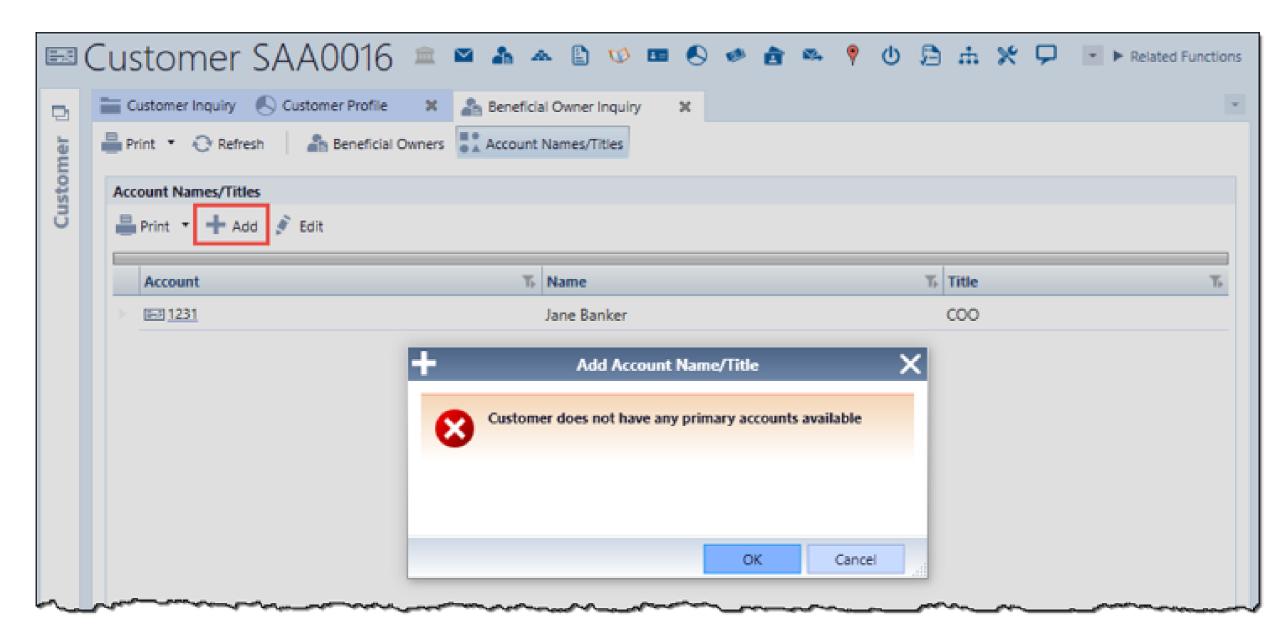






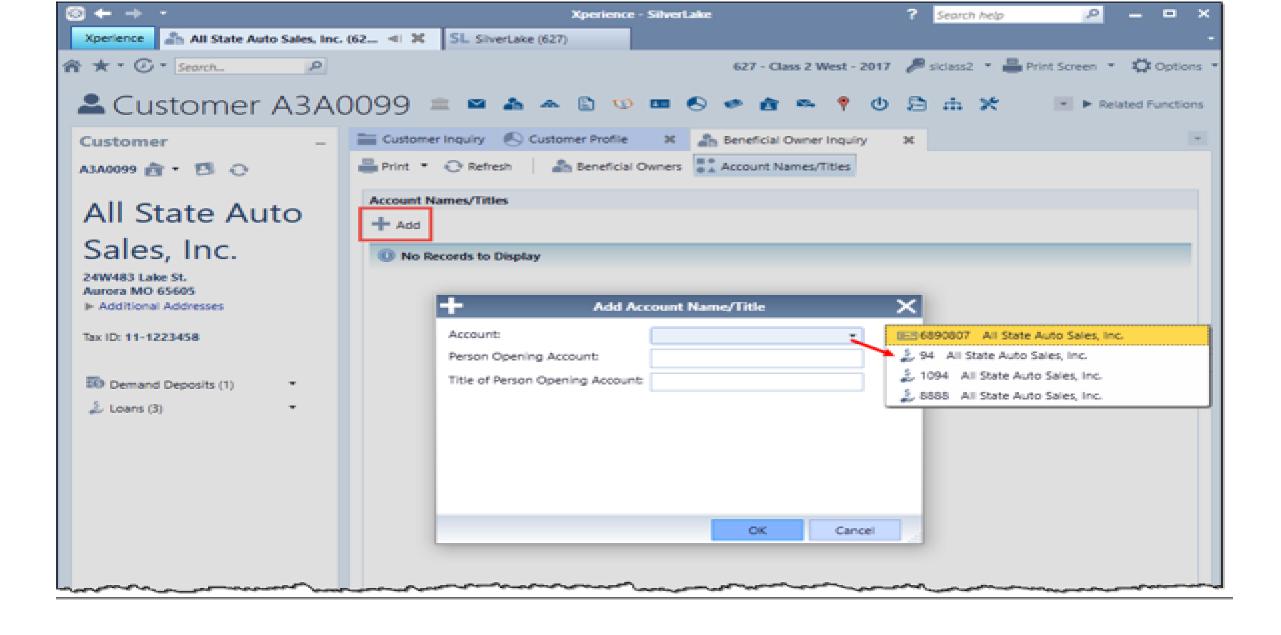


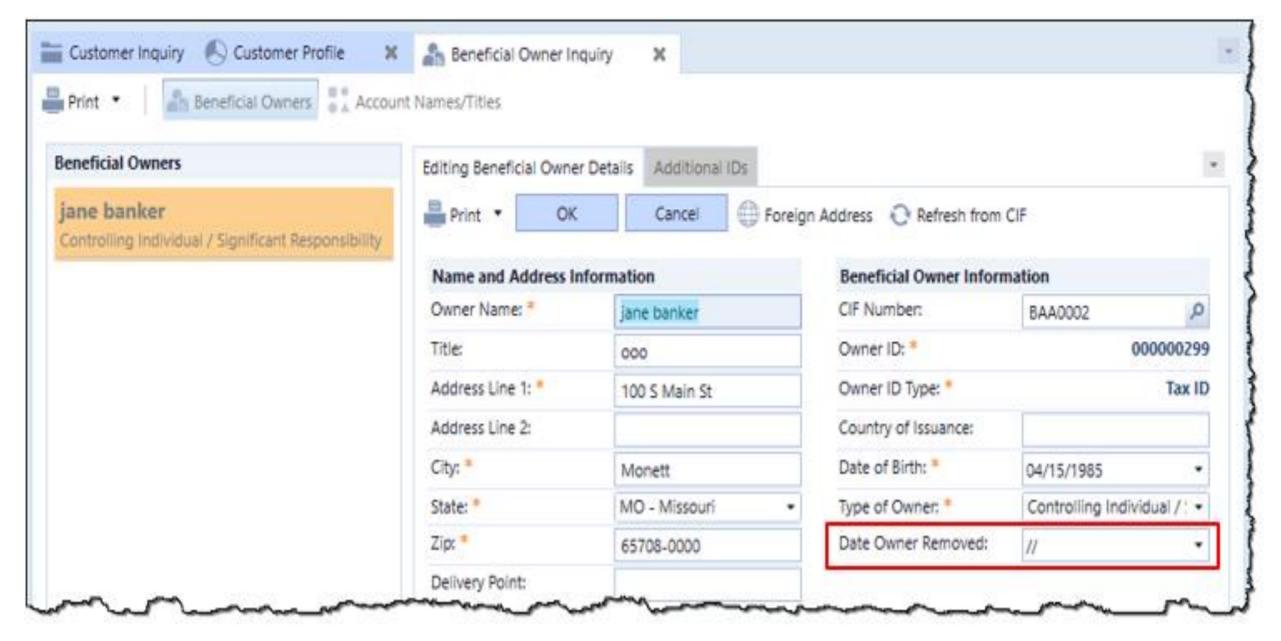


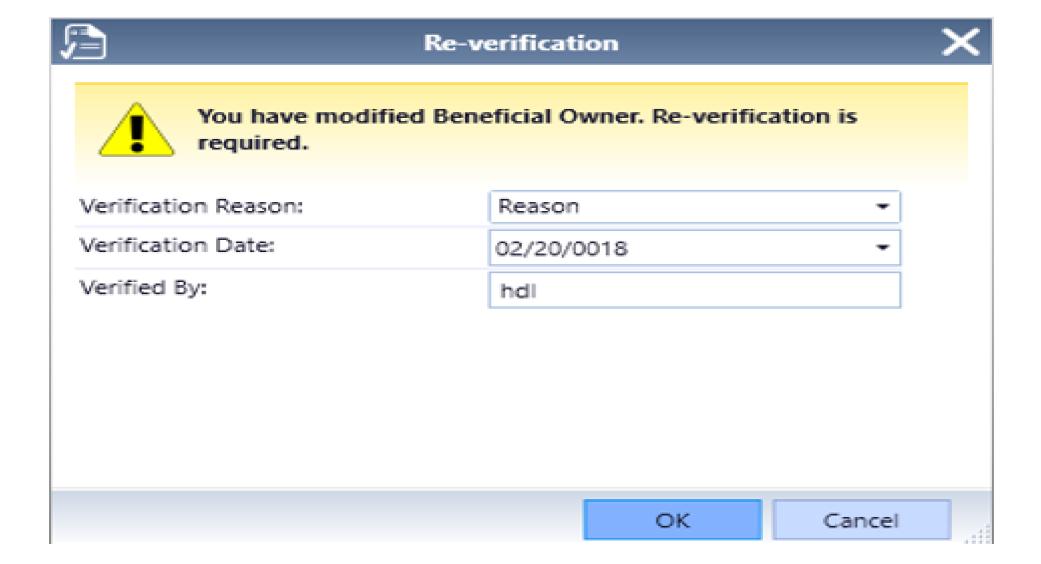






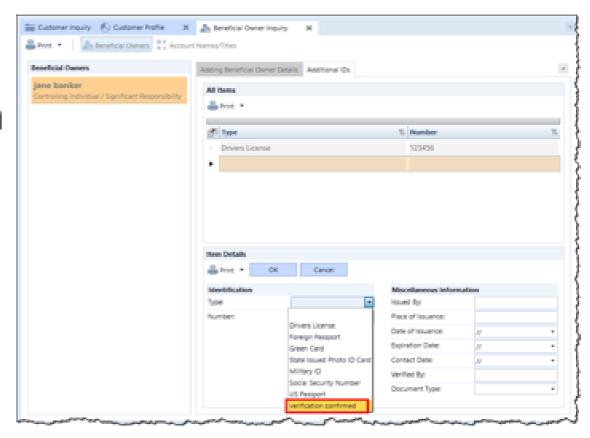






Future

- Proof of verification without making changes
 - Coming in a future package
- Current work-around
 - Create an ID type for verification
 - Adding an ID with verification would trigger the re-verification screen





New Reports

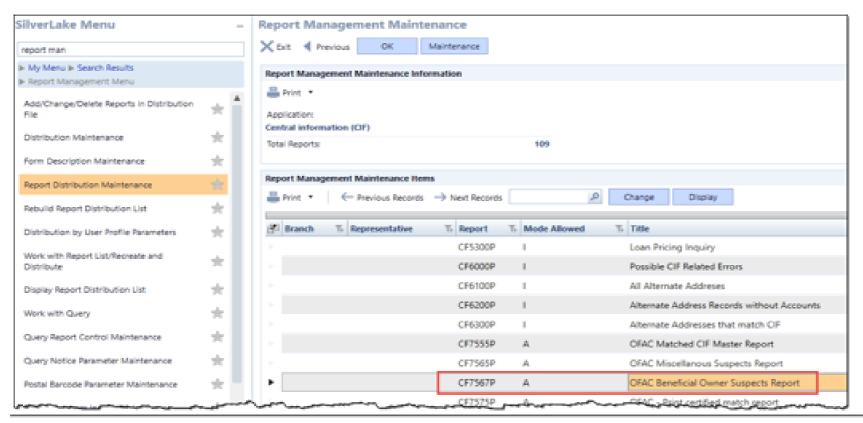
- CF7567P OFAC Beneficial Owner Suspects Report
- CF8000P FinCEN Beneficial Owner Report
- CF8001P FinCEN Legal Entity Report Included
- CF8002P FinCEN Legal Entity Report Excluded
- CF8003P FinCEN Legal Entity Exception Report
- CF8004P FinCEN Beneficial Owner CD Renewal Report
- CF8005P FinCEN New Beneficial Owners Today Report
- CFBO7590P OFAC Beneficial Owner Activity Report

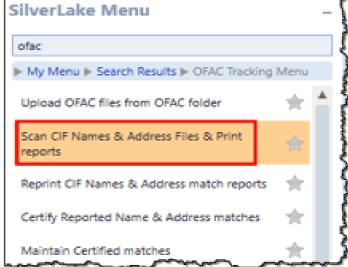


SilverLake Menu cfbeno ▶ My Menu ▶ Search Results Beneficial Owner Tracking CF8001P or CF8002P Print FinCEN Legal Entity Report Print FinCEN Legal Entity Exception Report CF8003P Print FinCEN Beneficial Owner CD Renewal CF8004P Report Print FinCEN New Beneficial Owners Today CF8005P 会 Report CF8000P Print FinCEN Beneficial Owner Report Print Beneficial Owner OFAC Activity (Current Day) CFBO7590P Print Beneficial Owner OFAC Activity (Prior 會 Day)



CF7567P – OFAC Beneficial Owner Suspects Report





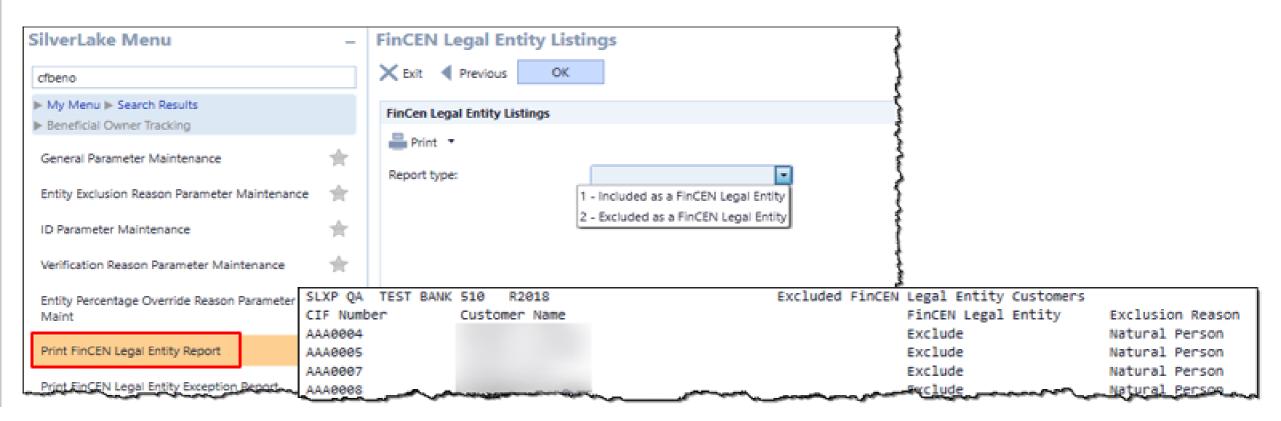
JACKHENRY University | Jack Henry Banking*







CF8001P – FinCEN Legal Entity Report – Included CF8002P – FinCEN Legal Entity Report – Excluded







CF8003P – FinCEN Legal Entity Exception Report

- The exception report lists entities with missing beneficial owner information.
- This report will be blank if generated prior to May 11, 2018.
- Tracking of legal entity information is not required until May 11, 2018.

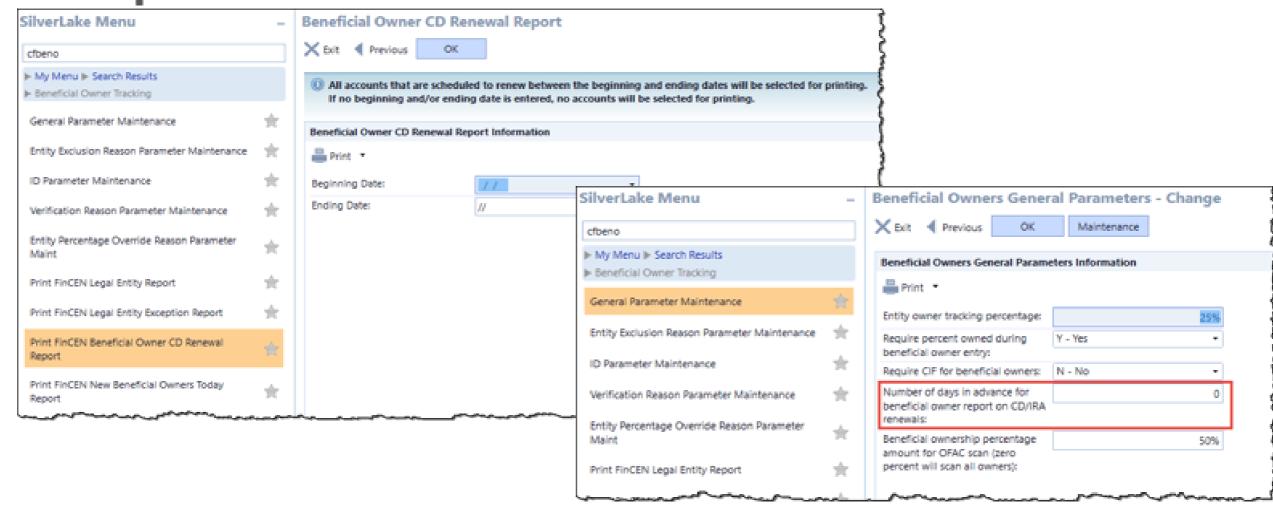
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SLXP QA TEST BANK 510 R2018 FinCEN Legal Entity Exception Listing

CIF Number Customer Name FinCEN Legal Entity

*** END OF REPORT ***
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CF8004P – FinCEN Beneficial Owner CD Renewal Report





CF8004P – FinCEN Beneficial Owner CD Renewal Report

Class 2 West			Beneficial Ow		i	
Legal Entity	Legal Entity					
CIF Number	Short Name					
B3A0012	BUREL REALTY	& DEVEL				
Accounts Be	ing Renewed					
Account I	Number	Maturity Date	Last Renewal Date	Current Balance		
	6545646	12/25/12	12/25/08			
Beneficial (Owner Informatio	on				
Name			Type	Percent Owned	ID Number	ID Type
No Owner	Records Exist					
Legal Entity	Legal Entity					
CIF Number	Short Name					
B302054	BASKETS UNLIN	MITED IN				
Accounts Be	ing Renewed					
Account 1	Number	Maturity Date	Last Renewal Date	Current Balance		
	701	1/14/13	1/14/09	2,500,000.00		
Beneficial (Owner Informatio	on				
Name			Type	Percent Owned	ID Number	ID Type
jane bank	ker		Controlling		000000299	TAXID





CF8000P – FinCEN Beneficial Owner Report or CF8005P – FinCEN New Beneficial Owners Today Report

Legal	Legal Entity	Beneficial		Owner	Percent	Owner	Owner	ID	Owner
Entity CIF#	Short Name	Owner	-	Туре	Owned	ID	ID Typle	CTRY	Birthdate
A3A0099	ALL STATE AUTO SALES	jane banker		Owner	30.00	000000299	TAXID		04/15/198
		Jim Banker	1	Both	30.00	000005555	TAXID		07/04/197
		james	(Owner	30.00	123445555	TAXID		07/13/197
8302054	BASKETS UNLIMITED IN	jane banker	(Controlling	.00	000000299	TAXID		04/15/1985
DAA0011	DAWSON CREEKSIDE REN	BRADLEY C DAWSON	(Controlling	.00	999008877	TAXID	USA	07/10/197
SAA0016	SAM DOE DOES DONUTS	Jane Banker	(Controlling	.00	000000299	TAXID	Van	04/15/198
		Albert Logan II	(Owner	30.00	987654321	TAXID		
*** END OF RE	EPORT ***								05/07/199



CFBO7590P – OFAC Beneficial Owner Activity Report

Class 2 West -	2017		Beneficial Owner OFAC Activity				3:33 PM	CFB07590P Page	2.
User: SLCLASS2									
Program	Work Station	Date Tim	e Inquiry Name		OFAC #	OFAC AKA#	Match c	ode	
BEN OWNER	QPADEV86N6	02/20/2018 15:3	:29 freddy garcia		ofijweofij				
	Legal Entity CIF	: AAA8014 Owner ID: 777	77777	Owner ID Type:	TAXID				
GARCIA	GARCIA, Freddy				4527		F6030		
	GARCIA, Fredy				4527	5694	F6030		

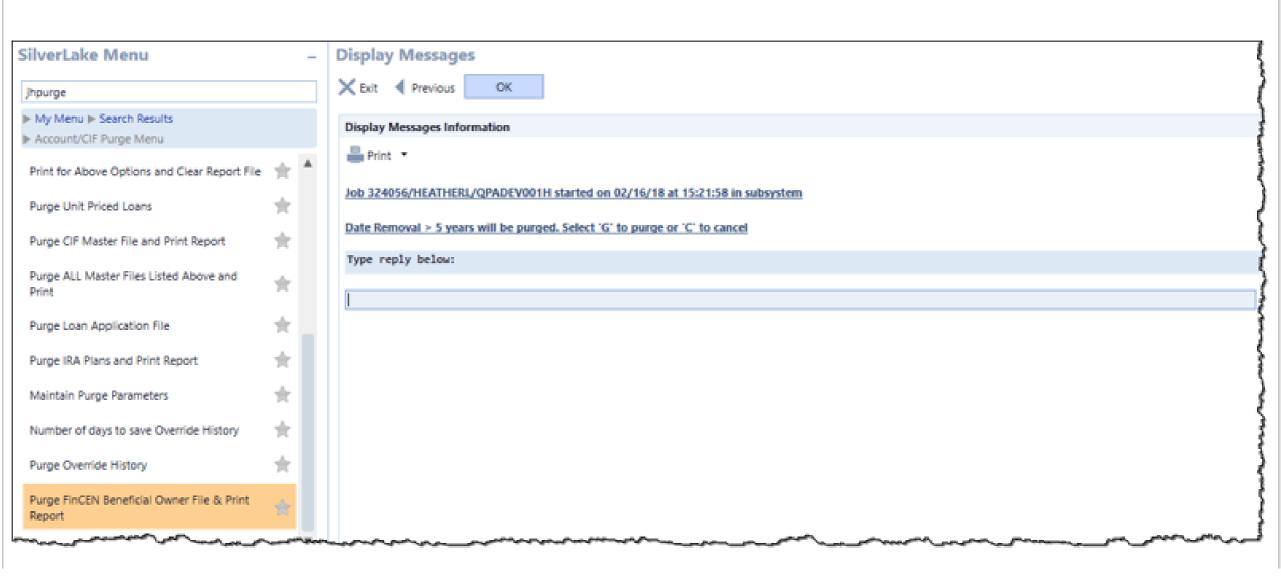


Beneficial Owner Purge

You can now purge beneficial owner records.

April 2018 enhancement. This is a follow-up enhancement to End-of-Year Release 2017 enhancement TFS 151815, jS1120253.









Reports

- Existing CF8900 Purged CIF Master Report now has a column for FinCEN Legal Entity – Include/Exclude.
- New CF8930P Purged FinCEN Beneficial Owner Report added.



This concludes Beneficial Ownership...

Questions?

