Certification of Beneficial Owner 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 opening a new account 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, 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 sole proprietorships, unincorporated associations, or natural persons opening accounts on their own behalf.

What information do I have to provide?

This form requires you to provide the name, address, date of birth and Social Security number (or passport number or other similar information, in the case of foreign persons) for the following individuals (*i.e.*, the **beneficial owners**):

(i) Each individual, if any, who owns, directly or indirectly, 25 % or more of the equity interests of the legal entity customer (*e.g.*, each natural person that owns 25 % or more of the shares of a corporation); *and*

(i) An individual with significant responsibility for managing the legal entity customer (*e.g.,* a Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, or Treasurer).

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

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.

RobinsFinancial

Certification of Beneficial Owner(s)

Any person opening an account on behalf of a Legal Entity must provide the following information:

Individual Opening the account:

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First	Middle	Last	Title				
Legal Entity Information:							
	Legal Entity Name		Legal Entity Type				
	. ,						
Physical Address		City	State	Zip Code			
Beneficial Owner(s)							

Complete the following information for <u>each</u> individual <u>who</u>, if any, directly or indirectly, <u>owns 25% or more</u> of the equity interest of the Legal Entity listed above. When no individual meets this criteria, print "Not Applicable " in the chart and explain on the line below (Ex: All <25%, Charity/Nonprofit, etc.):

	Full Name	DOB	Address	U.S Person: Social Security Number Non-U.S. Persons: Social Security Number, Passport Number & County of Issuance, or other similar Identification Number ¹	% of Ownership
1					
2					
3					
4					

Beneficial Ownership Detail: *Please explain on the line below any layers of Beneficial Ownership* (Ex: ABC Co is 50% owned by 123 Corp. 123 Corp. is 50% owned by John Doe, therefore John Doe is a 25% Beneficial Owner of ABC Co.)

Managing Individual

Complete the following information for one individual with significant responsibility for managing the Legal Entity listed above.

An executive officer or senior manager (Ex: CEO, CFO, COO, Managing Member, General Partner, President, Vice President, or Treasurer).

Any other individual who regularly performs similar functions. (An individual listed as a Beneficial Owner may also be listed as the Managing Individual)

	Full Name and Title	DOB	Address	U.S Person: Social Security Number Non-U.S. Persons: Social Security Number, Passport Number & County of Issuance, or other similar Identification Number ¹
1				

Certification

By signing below, I, hereby certify, to the best of my knowledge, that the information above is complete and correct.

Signature

Date

Legal Entity Identifier (Optional)

MSR Name

MSR #

Date/Time Received

¹ In lieu of a passport number, Non-U.S. person may also provide a Social Security Number, an alien identification card number, or number & country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.