

**CUSTOMER IDENTIFICATION PROGRAM PROCEDURES  
(CIP)  
UNDER THE USA PATRIOT ACT**

**ACCOUNT OPENING PROCEDURES**

**I. Determine Membership Eligibility**

Immediate family relative

Employee group

Designated Community Charter Area, (in example)

Erath county (employee group, live, work, worship, attend school)

Oklahoma City (employee group, live, work, worship, attend school)

Houston Underserved Area (contact credit union for qualifying areas)

Opening An Account In Person:

The credit shall generally request two forms of identification, one primary and one secondary form of identification. In addition, the credit union will use additional non-documentary forms of verification. A copy of the primary and secondary forms of identification shall be scanned into the system or copies attached to the signature card. A TeleCheck approval code is obtained and written on the face of the signature card. For a non-approval code from TeleCheck, a Start-Up account(s) is opened. Obtain verification the individual has been screened through the required government/fraud reports and store the information on the in-house system or attach results to the signature card. New Account Letter is mailed to member within seven (7) calendar days of new account opening. Place copy of letter in member file located on the L drive in the system.

**II. Identification Verification**

OBTAIN:

Name: legal name, no nicknames

Date of birth, for an individual

Address:

For an individual, a residential or business street address; a physical address,

For an individual who does not have a residential or business street address, an Army Post Office (APO) or Fleet Post Office (FPO) box number, or the residential or business street address of next of kin or of another contact.

For a person other than an individual (such as a corporation, partnership, or trust) a principal place of business, local office, or other physical location;

A mailing address may be accepted by the credit union after the physical address has been provided.

#### Identification Number:

For a U.S. person, a social security number or taxpayer identification number.

For a non-U.S. person, a taxpayer identification number; passport and country of issuance; alien identification card number; or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

For individuals who have applied for, but not yet received, a taxpayer identification number, the credit union will take measures to confirm the application was filed prior to opening the account. Generally, the taxpayer identification number shall be obtained by the 30<sup>th</sup> day after the account is opened.

When opening an account for a foreign business or enterprise that does not have an identification number, the credit union will request alternative government issued documentation certifying the existence of the business or enterprise.

### III. Verification Through Documents

For an Individual: Two forms of identification are generally required to establish a credit union account relationship or adding a signatory to an existing personal savings and/or checking account. The credit union shall accept one primary and one secondary form of identification to establish and credit union account relationship or adding a signatory to an existing personal savings and/or checking account.

The regulation states, *For an individual, unexpired government-issued identification evidencing nationality or residence and bearing a photograph or similar safeguard, such as a driver's license or passport.*

**Primary Identification** shall not be expired and include picture, description of person and signature of the individual. The following is a list of acceptable officially issued forms of primary identification:

- Non-expired US state picture driver license,
- Non-expired US state picture issued ID card,
- Non-expired US passport,
- Non-expired US military picture ID,
- Other non-expired federal picture ID,
- Alien registration card
- Mexican Consular ID Card (Matricula Card)

**Secondary identification** has some but not all components of primary identification. Secondary identification is not acceptable to open an account alone.

- Social Security card
- Individual taxpayer identification card
- Employer identification number
- Voter registration, current and issued in state of residence
- Birth Certificate
- Credit card, non-expired
- Bank cards, non-expired
- State government, non-expired
- Local government, non expired
- Company identification, current employer, non-expired
- Police identification
- Temporary driver license
- Non-expired Auto Insurance Card with legal name and current local physical address.
- Government Appraisal district tax records stating member/owner's legal name and physical residence.
- Local utility bill (telephone, power, gas, water, trash collection) in the legal name of the individual and current local physical address.
- Financial Statement Professionally prepared that must include the following:
  - Cover letter and or financial statement printed on letterhead of CPA or other Professional Financial Group/Association and, Legal name of individual or business and, Local physical address and, Dated within the last 12 months.
- Non-expired US Federal Government issued Permanent Resident Card and Social Security card that states "Valid for work only with INS authorization"
- Non-expired US Federal Government issued Employment Authorization Document and Social Security card that states "Valid for work only with INS authorization"
- Loan documents are accepted for only those account(s) opened through the Indirect Lending Program.

**Non-Documentary Forms of Verification** will be used when opening an account:

- \*TeleCheck, enter approval code on face of signature card
- Credit report
- Previous bank/credit union reference
- Site visit
- Telephone call to member
- \*Letter of Welcome, within 7 days of account opening, copy of letter in member file on L drive in system

\*Professional papers, i.e., certified articles of incorporation, partnership agreement, civic or club unincorporated association resolution, assumed name certificate, trust agreement, business license

US Department of Justice Immigration and Naturalization Service letter stating a new alien registration card will be issued. This letter shall accompany an expired alien resident card.

Current I. D. Checking guide or other publications available in local branch or main office.

\*Reviewing for matches on any required government lists such as OFAC, SDN and/or FinCEN.

Secretary of State on line at [www.sos.state.tx.us](http://www.sos.state.tx.us)

Verification of Employment

\*All accounts are processed through TeleCheck, all accounts must be sent a letter of welcome, all business/corporate accounts will have applicable professional papers, all accounts will be screened through required government lists.

**Unacceptable identification, do not use**, this is a sample of identification cards easily reproduced:

Hunting license

Marriage license

Rotary club or other civic organization card

Library card

Blockbuster video card

Grocery Store Card, i.e., Kroger, Randalls, Albertson's

Sam's or Costco card

Blood Card

Country club card

**New Account 90 Day Window:**

When adding a new checking service within the first 90 days of account opening, you may omit the Fraud and ID Advisor process (the member is screened weekly against the government lists). However, you must process the new checking service through TeleCheck.

**TX Driver License & ID Card On-Line Service:**

Go to the following web address to change the address on a TX driver license and ID card: <http://www.texasonline.state.tx.us>

Click on Online Services

Click on Driver License and ID Card Address Change

**Treasury Check Security Features; Altered Checks:**

All US Treasury checks have security features; these security features can help you determine if the check presented is authentic.

To view security features go to: <http://www.fms.treas.gov/checkclaims/index.html>.

**Accelerated Social Security Direct Deposit Enrollment:**

Toll-free helpline (877)-654-6347

**Online Social Security Benefits Application:**

To apply online for Social Security benefits go to:

<http://www.socialsecurity.gov/onlineservices/>

**Employer and Individual Tax Identification Number Applications:**

These applications are available on Galaxy:

- My Computer
- Groups
- Member Services

**HOW TO HANDLE CIP EXCEPTIONS**

Under the Customer Identification Program (CIP) rules you must prior to opening a new account always obtain:

1. Name
2. Address
3. Date of Birth
4. Social Security Number or Individual Tax Identification Number

**Minor Account:**

*All minor accounts must be have a custodian or joint owner(s) over the age of majority.*

Obtain the required minimum personal data on the minor.

Scan the Social Security Card.

Process the custodian or joint owner(s) through the CIP requirements.

**University/Technical School Students:**

Frequently students are in school away from “home” and want to open an account convenient to school. The driver’s license address will not agree with the current residence.

Primary Identification: Scan unexpired driver license and unexpired school identification.

Secondary Identification: see list.

Non-Documentary Verification: see list.

You may use the local residence as the mailing address. If you use a local PO Box as the mailing address, the local physical address must be listed in the non-mailing section in Galaxy.

**Victims of Natural Disaster:**

*All accounts opened under this type of circumstance must be logged into the system for follow-up and resolution of the identification issues by the 30th calendar day after opening date.*

Prior to opening an account you must obtain the minimum personal data as stated above (name, address, date of birth and taxpayer identification number).

You may open an account without primary or secondary identification.

You must obtain the individual's last permanent address.

Obtain the individual's current address, even if it is temporary.

If possible, try to verify the identity of the individual, using a **minimum of four (4)** non-documentary methods listed below:

If accepting: Treasury checks for Social Security, the Office of Personnel Management, and Railroad Retirement benefit payments can verify the identity of the benefit recipient by telephone. For guidance, see:

[http://www.fms.treas.gov/flexibility\\_thirdparty.html](http://www.fms.treas.gov/flexibility_thirdparty.html)

TeleCheck

Credit report

Letter of Welcome, within 7 days of opening account, copy of letter in member file on L drive in system.

Reviewing for matches on any required government lists such as OFAC, SDN and/or FinCEN.

**“Elderly” and/or “Disabled”:**

Any **two** of the following alternative forms of identification may be used to open an account:

Utility Bill: telephone, electricity, gas, water.

Voters Registration, current and issued in state of residence.

Family Bible, on the “Birth” page the individual's name and date of birth will be listed along with other family births.

State issued birth certificate

Company retirement check payable to individual.

Federal or state or county benefit check issued to individual.

Court documents indicating custodian or fiduciary appointment for the individual.

Social Security Card.

Individual Tax Identification Card

Comply with CIP process using the other forms of non-documentary verification requirements, see list.

**Released Parole/Inmate Person:**

Often these individuals are on a work release program and living in a half-way house which generally is their temporary residence.

Primary: Scan copy of unexpired driver license or other type of primary identification, if available.

Secondary: Scan copy of Social Security Card, or other type of secondary identification, if available.

Obtain current local physical address.

Comply with CIP process with other forms of non-documentary verification requirements.

In the event the individual does not have the above primary and secondary verification documents:

Scan copy of expired drive license, or other government issued picture ID, if available.

Obtain current local physical address. You may use the local residence as the mailing address. If you use a local PO Box as the mailing address, the local physical address must be listed in the non-mailing section in Galaxy.

Verify employment with local employer by calling the business and speaking with the individual's supervisor or Human Resources department.

Comply with CIP process with other forms of non-documentary verification requirements, see list.

**Inmate/Currently Incarcerated Person:**

Primary: Required: scan inmate Identification Card. Inmate's picture will be on the identification card.

Secondary: Required: scan copy of their state drive license or state issued Identification Card (accept either one of these even though it may be expired).

Required: letter on government letterhead from the inmate's case worker/counselor at the facility, dated within the last 30 days, original signature and phone number of the case worker. The letter will contain a request from the inmate to open an account with the credit union and the inmate's original legal signature will be include in the letter.

Scan copy of Social Security Card.

The inmates can receive statements at the prison, you may use the mailing address of the prison for the account

Comply with CIP process using the other forms of non-documentary verification requirements, see list.

**Opening An Account By Mail:**

The credit union shall generally request two forms of identification, one primary and one secondary form of identification and non-documentary verification.

The individual requesting to open an account by mail shall send a copy of the primary and secondary identification to the credit union with a written request to open the account. If the copy quality of identification is good, scan primary and secondary identification into the system, otherwise attach to the signature card.

Complete (typed) signature card with information provided from the identification, mail the signature card to the individual(s) for their signature(s).

Upon return of the signed signature card; process the individual through the Non-documentary forms of verification.

Obtain TeleCheck approval code and write code on face of signature card. For a non-approval code open a Start-Up account(s).

### **Accounts Opened Through Indirect Lending Program:**

We will accept the Credit Union Acceptance Corporation New Account Application as a valid document. The New Account Application shall include the new member's name; physical address; home and/or work telephone number(s) or alternate number where the individual(s) may be reached; social security number; driver license number and date of birth. The New Account Application must be signed new member(s) and dated. Copy of the primary identification shall accompany the New Account Application. Then loan documents shall serve as secondary identification.

Upon receipt of the New Account Application:

TeleCheck approval code is obtained and written on the face of the signature card or for a non-approval code a Start-Up account is opened.

The individual is processed through the other required non-documentary verification list.

CIP issues learned after the loan has been booked and funds disbursed, are referred to the designated person in the Houston office. Discrepancies on each account will be addressed on an individual basis to resolve the issues. We will attempt to contact the member via telephone and in writing if necessary to resolve the outstanding issues.

### **Direct Lending including Credit Cards**

When processing any type of loan, consumer or real estate, including credit cards and the joint applicant, co maker or cosigner is not already on the account or have a MTFCU account in their own name then the subsequent procedures will be followed.

The employee will review the OFAC result on the credit bureau report for passed or failed. If the result is failed then staff will follow established OFAC procedures and stop processing loan/credit card request.

Employee will follow CIP procedures by requesting one primary form of identification and one non-documentary form of identification such as the credit report. If there are any discrepancies or the employee is not comfortable with the identification documents presented then the employee should request further documentation listed under primary, secondary and non-documentary identification.

If there is a lack of insufficient identification documentation or the employee is still not comfortable with the identification documentation presented then the employee will get with their manager for further consideration or management approval.

### **When Not to Open Account:**

- Generally, the credit union shall not open an account if the credit union is unable to verify the true identity of the individual.
- Generally, the credit shall not accept any expired forms of primary or secondary forms of identification.
- If the credit union is unfamiliar with documents presented; the documents must be verified before opening an account
- If the credit union is presented with an increased risk if the account were to be opened

**Lack of Verification:**

In an unusual circumstance the credit union may open an account without the normally required documents. Management approval is required to deviate from established opening procedures. Such approval shall be noted on the signature card. The account shall be subject to Regulation CC, new account holds and new account processing under the Membership & Account Agreement.

**Closing An Account:**

The credit union shall close the account by the 30<sup>th</sup> day after attempts to verify the identity have failed. The account holder shall be notified in writing via certified/return receipt requested mail prior to the 30<sup>th</sup> day the account is to be closed due to non-verification of identification.

**Freezing and Blocking An Account:**

Upon notification, the credit union shall block and/or freeze the assets of an account holder within ten (10) days and comply with applicable instructions/regulations of such governmental agency.

**Suspicious Activity Report (SAR):**

SAR shall be generated by the credit union if:

- The true identity of an individual cannot be determined before or after opening an account
- Unusual account activity
- In accordance with applicable law and regulation

The member services representative/teller should be alert and watch out for:

- Large cash deposits.
- \$100 in cash followed by large checks.
- Mismatched identification of names and addresses.
- Inconvenient credit union location. Why are they opening an account with us at this location?
- Out of state license.
- Working out of state.
- Third party checks to open accounts.
- Any transaction that involves or aggregates more than \$5,000 when the credit union knows, suspects, or has reason to suspect the transaction.
- Evades any requirements of any regulations set forth under the Bank Secrecy Act.
- Involves funds derived from illegal activities, or is intended to hide funds or assets derived from illegal activities as part of a plan to violate or evade federal law or regulation, or to avoid any CTR requirement.
- Offers no business or apparent lawful purpose or is not the sort in which the particular member would normally be expected to engage, and the credit union know, of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction.
- Does not follow member's normal business patterns.
- Transaction cannot be explained reasonably after examining facts.

- When any known or suspected criminal violation has been committed against a credit union, regardless of the amount of money involved, if the credit union believes the violation was committed by an “insider”, (i.e., a director, officer, employee, agent or other institution affiliated part.)
- When any known or suspected criminal violation has been committed against a credit union by an “insider,” regardless of the amount.
- A member who asks about the limit on filing a CTR and makes a transaction in an amount just under \$10,000.
- An individual desires to open an account without providing references, local address, valid identification, presentment of unusual or suspicious identification that the credit union cannot identify; or refuses to provide any other information necessary to open an account.
- Members or businesses that do not normally generate currency make numerous currency transactions; deposits or withdrawals.
- When any known or suspected criminal violation has been committed against a credit union involving \$5,000 or more, if the credit union can identify a possible suspect who is not an insider.
- Whenever there is a transaction involving \$25,000 or more, regardless whether any suspects have been identified. Burglary or Robbery is excluded if it is appropriately reported to local law enforcement authorities. Completed SAR forms are to be filed with the Financial Crimes Enforcement Network (FinCEN), Detroit Computing Center, PO Box 33980, Detroit, Mi. 48232.
- An intrusion into the computer system to remove or steal funds, and/or member account information.

The purpose of filing a SAR is to identify violations or potential violations of the law. A SAR is filed by the credit union as deemed appropriate. If the suspicious activity continues over a period of time, a general rule to thumb is that a SAR should be filed at least every 90 days. This will serve the purpose of notifying law enforcement of the continuing nature of the account activity.

Federal law prohibits the notification of any person that is involved in the account activity being reported on a SAR that the activity has been reported.

SAR rules require that a SAR be filed no later than 30 days from the date of the initial detection of the suspicious activity. If no suspect was identified at the time the credit union first discovers facts which might lead to the filing of an SAR, the filing can be delayed up to an additional 30 days.

Continuing suspicious activity on an account will be reported via a Suspicious Activity Report at least every 90 days. Management of the office where the Suspicious Activity Report is generated will coordinate with the VP of Audit and Compliance to monitor the account to determine if other actions may be appropriate, (i.e. when to close the account, notify law enforcement.)

The Board of Directors or appropriate board committee shall be notified when a Suspicious Activity Report (SAR) is filed. The Board of Directors or an appropriate board committee shall be notified at the next regularly scheduled meeting following the filing of a Suspicious Activity Report.

In the event there is an instance when a Suspicious Activity Report is related to an individual in the credit union, such as the president or one of the members' of the Board of Directors, then deviation from established reporting procedures to the board or appropriate board committee will be in effect. Other appropriate uninvolved senior management and board representative(s) or appropriate board committee shall be notified of the filed Suspicious Activity Report.

Members Trust of the Southwest Federal Credit Union Board of Directors, Supervisory Committee, Other Board Related Committee, Officer, Employee or third party correspondent relationship knows or is aware that a Suspicious Activity Report has been filed may not notify any person involved in the transaction that the transaction has been reported. Any person subpoenaed or requested to disclose a Suspicious Activity Report or to provide information contained in a Suspicious Activity Report, except when such disclosure is requested by FinCEN or an appropriate law enforcement or federal banking agency, shall decline to produce the Suspicious Activity Report or to provide any information that would disclose that a Suspicious Activity Report has been prepared or filed, citing 31 CFR 103.18(e) and U.S.C. 5318 (g)(2). In the event an individual is requested to provide Suspicious Activity Report information, the credit union shall report this to FinCEN and NCUA.

The credit union is under Congress's Safe Harbor statute that provides protection to financial institutions from liability for good faith reporting.

#### **IV. Member Identification Record Keeping System**

Generally, active/open accounts will have a copy of the primary identification and TIN/social security card/W-9 attached to the signature card. The signature card shall contain name, address, date of birth, original signature and other relevant information about the individual. Active account signature cards are stored in the main office vault.

Signature cards for closed accounts are transferred to a permanent closed account signature card file. The closed account signature card file is maintained inside the vault at the main office. A copy of the member's identification, social security card, tax identification number or employer identification number will remain attached to the signature card in the closed account signature card file. This account information will be retained for five (5) years after the account has been closed or becomes dormant.

Confirmation of government lists including but not limited to OFAC and other outside identification data sources such as CSC Credit Services Fraud Advisor and ID Advisor Plus shall be maintained by either paper copy, saved onto a disk or other electronic means of storage. This data shall be maintained for five (5) years after the account has been closed or becomes dormant.

Any measures undertaken to verify identification, and description of the resolution of any substantive discrepancy discovered shall be maintained for five (5) years after the record is made. Generally, this documentation shall be attached to the signature card or placed in the legal file located in the main vault.

## **V. Comparison With Government Lists**

The credit union shall compare names with any lists of known or suspected terrorists or terrorist organizations issued by a federal governmental agency and designated as such by US Treasury in consultation with federal regulators.

A determination shall be made within a reasonable time after the account is opened, or earlier if required by federal law, regulation, or directive.

The credit union shall follow all federal directives issued in connection with such lists.

Initial new member identification shall be processed through CSC Credit Services, Inc.:

**Fraud Advisor** an index that identifies potential application fraud - Rank orders fraud risk and Identifies applicants with the highest fraud potential

Fraud Advisor Warning Codes in Priority Order:

- Deceased SSN
- SSN issued Prior to Date of Birth
- Invalid or Un-issued SSN
- Potentially Disconnected Telephone Number
- Invalid Telephone Number
- Telephone Number is a Pager
- Telephone Number is Assigned to a Mobile Service
- Invalid Address
- Zip Code Assigned to a PO Box Only
- Address has Suspect Apartment Unit Designation
- Higher Risk Commercial or Institutional Address
- Higher Risk Commercial or Institutional Telephone Number
- Telephone Number – Zip Code Mismatch
- Important Application Data Missing
- Match to Office of Foreign Assets Control (OFAC)

**ID Advisor Plus** is a real time process for verifying application data, potential data mis-keys are identified

- Name
- Address
- Phone
- Social Security number
- Date of birth

ID Advisor Plus Warning Codes in Priority Order:

- 00801 Important Application Data Missing
- 00819 Unable to Verify Applicant Name, Address, SSN and Phone Number
- 00820 Unable to Verify Applicant Name, Address & Phone Number
- 00821 Unable to Verify Applicant Name & Phone Number
- 00822 Unable to Verify Applicant Name & Address
- 00823 Unable to Verify Applicant Name & SSN
- 00824 Unable to Verify Applicant Address & SSN
- 00825 Unable to Verify Applicant Address
- 00826 Unable to Verify Applicant SSN
- 00827 Unable to Verify Applicant Phone Number
- 00828 Unable to Verify Applicant Date of Birth
- 00829 Potential Data Mis-Key – Social Security Number
- 00830 Potential Data Mis-Key – Address
- 00831 Potential Mis-Key – Phone Number

**Social Security Number Verification Level Codes** in Priority Order:

- 00 Not Verified
- 01 Name and Address Different
- 02 First Name and Social Match, Last Name and Address Different
- 03 Social and Address Match, First and Last Name Different
- 04 Last Name and Social Match, Address Different
- 05 Full Name and Social Match, Address Different
- 06 First Name, Social and Address Match
- 07 Last Name, Social and Address Match
- 08 Full name, Social and Address Match

Number of Verification Sources:

- 00 Not Verified
- 01 1 Data Source Checked
- 02 2 or more Sources Checked

TeleCheck approval code is generally required to open a new savings and or checking account or add a signatory to an existing credit union account. In the event a non-approval code, such as a “Code 4”, is given by TeleCheck only a Start-Up savings/checking account(s) may be opened. Account types for Start-Up savings and checking are 31 and 13 respectively.

OFAC Compliance applies to all persons subject to the Jurisdiction of the United States:

Includes American citizens and permanent resident aliens wherever they are located, individuals and entities located in the United States (including all foreign branches, agencies, Rep offices, etc.); corporations organized under US law, including foreign branches; and (under TWEA based sanctions) entities owned or controlled by any of the above, the most important being foreign-organized subsidiaries of the US corporations.

Example of Parties Subject to OFAC:

- Primary account holder.
- Joint account holder.
- Convenience account signer.
- Co-signers and Guarantors on loans.
- Collateral Owners.
- Beneficiaries Payable on Death parties.
- Parties on the other end of a wire transfer.
- Non-members cashing member checks drawn on their credit union account.
- Safe Deposit Box co-renter, deputy
- Credit card advances for non-members.
- Redemption of US Savings Bonds for non-members.

OFAC Alert and other governmental lists as required by law, regulation or directive shall be used to process individuals for new accounts and addition of account signatory.

The credit union's membership base is re-screened weekly by Galaxy-Fiserv against the national OFAC list to determine whether any Members Trust account holder is on the OFAC list. Designated credit union employee reviews the Galaxy-Fiserv OFAC report weekly. Reports are maintained in the main office.

Specially Designated Nationals and Blocked Persons: Individuals and entities which are owned or controlled by, or acting for or on behalf of, the Governments of target countries or are associated with international narcotics trafficking or terrorism. These individuals and entities are listed on the Treasury Department's Specially Designated Nationals and Blocked Persons list so that persons subject to the jurisdiction of the United States will know that they are prohibited from dealing with them and that they must block all property within their possession or control in which these individuals and entities have an interest.

The credit union responds in a timely manor to all Fin CEN requests through the FinCEN secure web page and follows their directives in the event there is a name match with our data base. A designated credit union employee compares our database with FinCEN suspicious individual(s) list. The teller initials and dates the printed report from FinCEN and then files the paperwork.

The most recent Specially Designated Nationals and Blocked Persons (SDN) list is maintained at MTFCU through Galaxy. The SDN master alphabetical list is available at [www.treas.gov/offices/enforcement/ofac/](http://www.treas.gov/offices/enforcement/ofac/).

## **VI. Member (Customer) Notice**

The credit union shall provide individuals with adequate notice that it is requesting information to verify their true identities. The credit union may, but not limited to, place a sign in the lobby of each credit union location, credit union website and/or other places deemed appropriate for the notice to appear.

### USA PATRIOTS ACT

#### Member Identification Notice

In accordance with Section 326 of the USA Patriot Act, applicants for new accounts are required to provide current picture identification that verifies identity including name, address and other identifying information.

In some cases, identification will be requested for current account holders if original documentation was not obtained with the opening of the account. In all cases, protection of our members' identity and confidentiality is our pledge to you.

We proudly support all efforts to protect and maintain the security of our members and our country.

### **QUICK OVERVIEW OF ACCOUNT OPENING PROCEDURES**

#### **PERSONAL ACCOUNT**

- Determine Membership Eligibility
- Account Opening Procedures vary for "in person" or "by mail" or "Indirect Lending Program". See Account Opening Procedures detailed instructions.
- Obtain: legal name, physical address, SSN, date of birth, for all signatories on the account
- Two forms of Identification required to open account: (1) primary, (1) secondary. Scan into the system or attach copy of identifications to completed signature card.
- Complete all Non-Documentary Forms of Verification:

For TeleCheck, enter approval code on face of signature card; for a non-approval code, only a Start-Up Account may be opened. If an account is not opened give or send the following TeleCheck disclosure to individual.

Dear Customer:

We are sorry that we cannot accept your check or open your account this time. Our decision is based, in part on information provided to us by TeleCheck. *If you have received a turndown, our decision may also be based at least in part, on TeleCheck's need for additional information.* We encourage you to call or write Telecheck's Check Writer Services Office to obtain information in TeleCheck's files. Whether you call or write, please include with your request the information listed on the reverse side of this card.

Please provide the following information so TeleCheck may respond promptly to your request:

1. Your full name and its spelling
2. The name of your company, if applicable
3. Your driver's license number and the state where it was issued
4. The banking numbers printed along the bottom of your check
5. Your social security number, if you were referred by a financial institution
6. Your complete mailing address including ZIP code
7. Your daytime telephone number with area code
8. The name of the merchant or financial institution that referred you to TeleCheck.

*Under the Fair Credit Reporting Act, consumers have the right to a free copy of the consumer's information held in TeleCheck's files for a period of 60 days following as adverse action. Consumers also may dispute the accuracy or completeness of any information in TeleCheck's consumer report. TeleCheck did not make the decision to take an adverse action (i.e. not accept the check or open the account) and is unable to provide you with specific reason(s) why an adverse action was taken.*

Write TeleCheck's Check Writer Services Offices At:

PO Box 4513 Houston, TX 77210-4513

Or Call TeleCheck 24 Hours A Day At: 1-800-366-2425

- Determine account ownership, individual or joint.  
Individual owner must initial on back of signature card with/without Payable on Death Designation.  
For joint ownership, all account owners/signers must initial and choose with/without rights of survivorship. If this section is not completed, we do not have a valid contract with the account holders.
- Complete personal account signature card with requested information (**TYPED**).
- Have account owner(s) sign their legal name and date in ink.
- By law the new account holder must receive the following disclosures:
  - Membership and Account Agreement
  - Truth-in-Savings
  - Fee Schedule
  - Funds Availability
  - Rate Sheet
  - Privacy Act Notice
  - Over Draft Privilege Disclosure

## **BUSINESS ACCOUNT**

### **Sole Proprietorship**

Determine Membership Eligibility.

- Obtain from account owner(s): legal name, physical address, SSN, date of birth.
- Two forms of identification on the owner/member are required to open an account:  
(1) primary, (1) secondary.  
Scan identifications to system or attach copies to the business account signature card.  
Obtain physical address of principal place of business, local office or other physical location.
- Complete all Non-Documentary Forms of Verification:  
For TeleCheck, enter approval code on face of signature card, for non-approval give or send the following TeleCheck disclosure to the individual.

Dear Customer:

We are sorry that we cannot accept your check or open your account this time. Our decision is based, in part on information provided to us by TeleCheck. *If you have received a turndown, our decision may also be based at least in part, on TeleCheck's need for additional information.* We encourage you to call or write Telecheck's Check Writer Services Office to obtain information in TeleCheck's files. Whether you call or write, please include with your request the information listed on the reverse side of this card.

Please provide the following information so TeleCheck may respond promptly to your request:

1. Your full name and its spelling
2. The name of your company, if applicable
3. Your driver's license number and the state where it was issued
4. The banking numbers printed along the bottom of your check
5. Your social security number, if you were referred by a financial institution
6. Your complete mailing address including ZIP code
7. Your daytime telephone number with area code
8. The name of the merchant or financial institution that referred you to TeleCheck.

*Under the Fair Credit Reporting Act, consumers have the right to a free copy of the consumer's information held in TeleCheck's files for a period of 60 days following as adverse action. Consumers also may dispute the accuracy or completeness of any information in TeleCheck's consumer report. TeleCheck did not make the decision to take an adverse action (i.e. not accept the check or open the account) and is unable to provide you with specific reason(s) why an adverse action was taken.*

Write TeleCheck's Check Writer Services Offices At:

PO Box 4513 Houston, TX 77210-4513

Or Call TeleCheck 24 Hours A Day At: 1-800-366-2425

- Obtain *Assumed Name Certificate* on all sole proprietorships located in state of Texas, not required on Oklahoma accounts.
- Obtain a completed sole proprietorship resolution or complete credit union sole proprietorship resolution.
- Complete account card and account authorization cards, (TYPED).
- By law the new account holder must receive the following disclosures:
  - Membership and Account Agreement
  - Truth-in-Savings
  - Fee Schedule
  - Funds Availability
  - Rate Sheet
  - Privacy Act Notice
  - Overdraft privilege Service

#### Partnership

- Determine Membership Eligibility
- Entity obtain: legal name, address, Employer identification number
- On the person (one or both of the partners) opening the new account, two forms of identification are required to open an account: (1) primary, (1) secondary. Scan identification into the system or attach copy of identification to business account signature card

- Obtain physical address of principal place of business, local office or other physical location
- Complete all Non-Documentary Forms of Verification:  
the partner(s) opening the account is processed through TeleCheck, enter approval code on face of signature card, for non-approval give or send the following TeleCheck disclosure to the individual.

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PO Box 4513 Houston, TX 77210-4513

Or Call TeleCheck 24 Hours A Day At: 1-800-366-2425

- Obtain Assumed Name Certificate is required in State of Texas when operating under an assumed name for any type of partnership
- Limited Partnership, obtain Certificate of Limited Partnership which is issued by the Secretary of State.
- For Limited Liability Partnership, obtain Partnership Registry, which is issued by the Secretary of State's Office in the state where the partnership was been formed.
- Obtain a completed resolution or complete credit union resolution based on the type of partnership, this will identify all partners; make sure all partners sign the resolution.

General Partnership

Limited Partnership

Limited Liability Partnership

- Open savings/checking account(s) in system.
- Complete business account and account authorization cards, (TYPED).

- By law the new account holder must receive the following disclosures:
  - Membership and Account Agreement
  - Truth-in-Savings
  - Fee Schedule
  - Funds Availability
  - Rate Sheet
  - Privacy Act Notice
  - Overdraft Privilege Service

### Corporation

- Determine Membership Eligibility
- Entity obtain: legal name, address, Employer identification number
- Only the (corporate secretary) may open the new account, two forms of identification are required to open an account: (1) primary, (1) secondary. Scan into the system or attach copy of identification to business account signature card. *The opening and closing of an account is authorized by the Board of Directors and carried out by the Corporate Secretary.*
- Obtain physical address of principal place of business, local office or other physical location.
- Complete all Non-Documentary Forms of Verification:  
For TeleCheck, enter approval code on face of signature card, for non-approval give or send the following TeleCheck disclosure to the individual.

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Write TeleCheck's Check Writer Services Offices At:

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Or Call TeleCheck 24 Hours A Day At: 1-800-366-2425

- Obtain: Assumed Name Certificate is required in State of Texas when operating under an assumed name for any type of corporation. The assumed name certificate is be issued by the County Clerk.
- Obtain: excerpt from the *Minutes of the Board Meeting* where officers of the corporation were elected---specifically the Secretary of the corporation since this person who opens the account and signs the resolution.
- Obtain: Certificate of Incorporation, which is issued by the Secretary of State in the state where the corporation was incorporated. A corporation is formed when Articles of Incorporation are filed with the Secretary of State to approve a new business. Once approved by the state, a Certificate of Incorporation is issued.
- If the corporation is a foreign corporation, a Certificate of Authority is issued by the Secretary of State.
- Obtain completed current corporate resolution or complete credit union resolution.
- Open savings/checking account(s) in system
- Complete business account authorization card and account signature card, (TYPED).
- By law the new account holder must receive the following disclosures:
  - Membership and Account Agreement
  - Truth-in-Savings
  - Fee Schedule
  - Funds Availability
  - Rate Sheet
  - Privacy Act Notice
  - Overdraft Privilege Service

#### Limited Liability Company (LLC)

- Determine Membership Eligibility
- Obtain: legal name, address, employer identification number or social security number if this is a one person LLC.
- On the person opening the new account, two forms of identification are required to open an account: (1) primary, (1) secondary. Scan into the system or attach copy of identifications to business account signature card.
- Obtain physical address of principal place of business, local office or other physical location.
- Complete all Non-Documentary Forms of Verification:
  - For TeleCheck, enter approval code on face of signature card, for non-approval give or send the following TeleCheck disclosure to the individual.
  - Dear Customer:  
We are sorry that we cannot accept your check or open your account this time. Our decision is based, in part on information provided to us by TeleCheck. *If you have received a turndown, our decision may also be based at least in part, on TeleCheck's need for additional information.* We encourage you to call or write Telecheck's Check Writer Services Office to obtain information in TeleCheck's files. Whether you call or write, please include with your request the information listed on the reverse side of this card.

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2. The name of your company, if applicable
3. Your driver's license number and the state where it was issued
4. The banking numbers printed along the bottom of your check
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6. Your complete mailing address including ZIP code
7. Your daytime telephone number with area code
8. The name of the merchant or financial institution that referred you to TeleCheck.

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Write TeleCheck's Check Writer Services Offices At:

PO Box 4513 Houston, TX 77210-4513

Or Call TeleCheck 24 Hours A Day At: 1-800-366-2425

- Obtain: Assumed Name Certificate is required in State of Texas when operating under an assumed name for any type of limited liability company. The assumed name certificate is filed with the County Clerk.
- Obtain: Certificate of Organization which is issued by the Secretary of State in the state where the corporation has been incorporated. A limited liability company is formed when Articles of Organization are filed with the Secretary of State to approve a new business. Once approved by the state, a Certificate of Organization is issued.
- If the limited liability company is a foreign LLC a Certificate of Authority is issued by the Secretary of State.
- Obtain completed current limited liability company resolution or complete credit union resolution.
- Open savings/checking account(s) in system
- Complete business account authorization card and account signature card, (TYPED).
- By law the new account holder must receive the following disclosures:
  - Membership and Account Agreement
  - Truth-in-Savings
  - Fee Schedule
  - Funds Availability
  - Rate Sheet
  - Privacy Act Notice
  - Overdraft Privilege Service

#### Non-Profit Unincorporated Association

- On the person opening the new account, two forms of identification are required to open an account: (1) primary, (1) secondary. Scan into the system or attach copy of identifications to business account signature card.
- Obtain physical address of principal place of business, local office or other physical location, if available. The physical address will depend upon the type of non-profit/unincorporated association.

- Complete all Non-Documentary Forms of Verification:  
For TeleCheck, enter approval code on face of signature card, for non-approval give or send the following TeleCheck disclosure to the individual.

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Write TeleCheck's Check Writer Services Offices At:

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Or Call TeleCheck 24 Hours A Day At: 1-800-366-2425

- Obtain Minutes of Non-Profit Unincorporated Association, authorizing the opening of the account and naming the authorized account signatories and their powers.
- Obtain completed current Non-Profit Unincorporated Association resolution or complete credit union resolution.
- Open savings/checking account(s) in system
- Complete account signature and account authorization card, TYPED.
- By law, the new account holder must be given the following brochures:  
Membership and Account Agreement  
Truth-in-Savings  
Fee Schedule  
Funds Availability  
Rate Sheet  
Privacy Act Notice  
Overdraft Privilege Service

#### Cross Sell Other Credit Union Services

Private Line	MasterCard	Share Certificates	Loans
Debit/ATM card	Direct Deposit	Travelers Checks	Wires
Super Saver	Over Draft Protection		

Last Updated May 16, 2006.

Board Approved May 24, 2006.