



# Independent Bankers Association of Texas

## Compliance Helpline 800.749.4228

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### Compliance Tools

## Resources for Customer Due Diligence Requirements

TITLE	RESOURCE LINK
Federal Register: Customer Due Diligence Requirements for Financial Institutions	<a href="#">Final Rule</a>
FinCen FAQs – July 19, 2016	<a href="#">Link</a>
FinCen FAQs – April 03, 2018	<a href="#">Link</a>
FinCen: Beneficial Ownership Requirements for Legal Entity Customers of Certain Financial Products and Services with Automatic Rollovers or Renewal 5/16/18	<a href="#">Link</a>
FinCen: Permanent Exemptive Relief Extension of Compliance Date CDs_final 5082.pdf	<a href="#">Link</a>
FFIEC BSA/AML Examination Manual: Customer Due Diligence - Overview	<a href="#">Link</a>
FFIEC BSA/AML Exam Manual: Beneficial Ownership Requirements for Legal Entity Customers – Overview	<a href="#">Link</a>
Texas Verification of Entities Registered with the State	<a href="#">Link</a>
Texas Comptroller of Public Accounts: Franchise Tax Account Status	<a href="#">Link</a>
<b>IBAT Legal Ease for CDD:BO Q&amp;As &amp; IBAT Resource(s)</b> (you will need to be Logged-into the IBAT web-site for access to review the answer)	
If we had already done EDD/CDD at initial loan funding or booking a CD prior to May 11, 2018 but did NOT obtain or complete the certification form found in Appendix A, would we then have to get the Certification Form with any renewal after May 11, 2018? 01/18	<a href="#">Answer</a>
Is a homeowners' association (HOA) a 'legal entity' under the Beneficial Ownership Rules effective May 11, 2018? 3/18	<a href="#">Answer</a>
We have a legal entity opening an account. The owners are 2 individuals and one LLC, each owning 33.3%. Do we have to 'dig' down to identify beneficial owners of the LLC until we identify the natural persons behind the LLC? 4/2/18	<a href="#">Answer</a>
Can we rely upon previously collected beneficial ownership information provided by a 'legal entity' for loan renewals and certificate of deposit rollovers? 4/6/18	<a href="#">Answer</a>
Do we have to post a notice regarding Beneficial Ownership? If we do, can we incorporate that into the required CIP notice? 4/13/18	<a href="#">Answer</a>
Are IOLTA accounts subject to the Beneficial Ownership rules? 4/27/18	<a href="#">Answer</a>
Do we have to keep copies of documents we relied on to verify the identity of beneficial owners and the individual with control of a legal entity? 5/28/18	<a href="#">Answer</a>
Compliance Guidelines: Customer Due Diligence [CDD]	<a href="#">Link</a>
FAQs for customer Due Diligence - Beneficial ownership Requirements	<a href="#">Link</a>
IBAT Magazine: The Texas Independent Banker: 'A Legal Entity Primer' by Karen Neeley	<a href="#">May-June 2018 Edition</a>



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