

## **CUSTOMER IDENTIFICATION PROGRAM NOTICE 06/13/2020**

### **Important Information You Need to Know About Opening a New Account**

U.S. Federal Law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account. This Notice answers some questions about Ladenburg Thalmann & Co. Inc's Customer Identification Program.

### **What types of information will you need to provide?**

When you open an account, Ladenburg Thalmann salespeople will be required to collect information of beneficial owners of accounts:

- Your name;
- Your Date of Birth;
- Your legal home address;
- Identification numbers such as, 1- Social Security number AND 2- Drivers License number & state, expiration date or passport number & expiration date;
- You will also need to send to us a copy of documentary identification within 30 days:
  - A. For a U.S. Citizen: A current copy of your Drivers license or passport with photograph.
  - B. For a Non-U.S. Citizen: Unexpired Passport number with your photo and country, unexpired alien identification card number or unexpired government-issued identification showing nationality, residence and photograph. Non U.S. citizens must provide copies at account opening; no 30 day waiting period or grace period exists.
  - C. For a corporation, partnership, trust or other legal entities, the following information is required:
    - 1- The entity's principal place of business or local office; and
    - 2- The entity's TAX identification number,

In addition, Ladenburg Thalmann will require one of the following:

- 1- Certified articles of incorporation, a partnership agreement or sole proprietor document or other government issued business license that includes the names and signature of officers OR Beneficial owners;
- 2- A letter on company letterhead stating the names of any other authorized individuals who can act or trade on behalf of the company; or
- 3- A full copy of a trust instrument or agreement, including the investment powers and trustee signature page.

Customer due diligence rules require that we ask the nature and purpose of customer relationships.

U.S. Department of the Treasury, through FinCen, Securities and Exchange Commission (SEC), FINRA and the Patriot Act require you to provide this information. The rules also may require Ladenburg to request additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance. You may also be asked whether you act as an agent for another person or entity. You may be asked to provide information about a trust's structure, the provider of the trust or those that have control over the funds or assets. \* Exclusions apply; see the list of excluded entities.

Effective May 11, 2018, for accounts that are defined as "legal entity" customers pursuant to the FINCEN Customer Due Diligence rule, Ladenburg is required to request and document the following information:

- 1) For identification, any identifying information obtained by the Firm pursuant to the rule, by collecting and verifying information on individuals, if any, who hold directly or indirectly, 25 % or more of the equity interests in and one individual who has managerial control of a legal entity customer.

### **What happens if you don't provide the information requested or if your identity can't be verified?**

Ladenburg Thalmann may not be able to open an account or carry out transactions for you. If Ladenburg Thalmann has already opened an account for you, it may have to close it.

Ladenburg Thalmann will not do business with or open accounts for Specified Banks, including without limitation: Latvian, Syrian, and Lebanese Banks, Banco Privada d' Andorra, Banco Delta Asia, Commercial Bank of Syria, Syrian Lebanese Commercial Bank SAL, Islamic Republic of Iran, Burma and JSC CredexBank, Halwai Exchange Co., Burma, Kassem Rmeiti & Co. Inc. For Exchange, Liberty Reserve S.A., Lebanese Canadian Bank SAL, and FBME Bank LTD. Your account with Ladenburg Thalmann may not be used to provide these Specified Banks access to financial institutions. During the life of your account you may also be asked for the source of funds that you send in for deposit to your account by check or fed fund wire transfer.

**Approved by Robert C. Mateicka, Chief Compliance Officer**

**Approved by Peter Zglinski, AML officer**