

To: 'USPWM-PB-US@list.db.com' <[REDACTED]>  
Cc: Dawn Forbes <[REDACTED]>; Irwin Nack <[REDACTED]>; Kshitij Golani <[REDACTED]>; Prashant Mahendru <[REDACTED]>; Oliver Esslinger <[REDACTED]>; Olivier Poncet <[REDACTED]>; Barry H Morris <[REDACTED]>; Janice Franklin <[REDACTED]>; Yoonsun Chung <[REDACTED]>; Thomas Klemm <[REDACTED]>; Derek St-Hilaire <[REDACTED]>; [REDACTED]@[REDACTED]; Mary C Keaveney <[REDACTED]>; Anil Tewani <[REDACTED]>  
Subject: Important Update: FinCen CDD Rule Procedures [I]  
Importance: High

Classification: **For internal use only**

Hello Everyone,

I am pleased to offer some good news on the delivery options for the FinCEN CDD Form. Thank you to Irwin, Janice, Oliver, and Patrick for their efforts on this topic.

As many of you know, there was a change which required us obtain a notarized form or to verify the form with the signor in nearly all instances. However, effective immediately, AFC has approved a third option, which permits us to signature verify the form instead of notary or written confirmation from the signor. This should provide substantial relief to our clients.

**FinCEN CDD Form Delivery Options:**

1. **Original (via mail/FEDEX):**
  - a. The form must be notarized **OR**
  - b. If notarization is not possible, verification email from the person who signed the form is required. You can obtain this by sending the form (or a snip-it of the form) to the person who signed it and asking them to confirm back via email that they signed the form. **OR**
  - c. The form must be signature verified
  
2. **Fax or Fax2Mail:** We may assume that person who faxed the CDD Form is the same person who signed it.
  - a. The form must be notarized **OR**
  - b. If notarization is not possible, verification email from the person who signed the form is required. You can obtain this by sending the form (or a snip-it of the form) to the person who signed it and asking them to confirm back via email that they signed the form. **OR**
  - c. The form must be signature verified
  
3. **Email:**
  - a. If the email is sent from the person signed the FinCEN CDD form:
    - i. FO should PDF the email and attach to the account opening documents
    - ii. DBOI will look for PDF email + FinCEN CDD form. If not available, then DBOI should reject the request and send back to the FO.
  - iii. The form should be signature verified
  - b. If the email did **not** come from the same person who signed the FinCEN CDD form:
    - i. The form must be notarized; **OR**
    - ii. Verification email from the person who signed the form is required. This email must be PDFed by the FO and attached to the account opening case. **OR**
    - iii. The form must be signature verified

As a reminder, the form is available on the WM Portal, under KYC Forms  
[\[REDACTED\]n/files/WM189666 MRG 026819 Certification Regarding Beneficial Owners of Legal Entity Customers 051818 Interactive FINAL.pdf\)](#)

The mydb page [\[REDACTED\]com/docs/DOC-468443\)](#) has been updated with this revised guidance.

If you have any additional questions, please reach out.

Best,  
Armen