OFAP PTS USER GUIDE

Office of Foreign Assets Control function for Participants (OFAP) July 2008

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About OFAP

In compliance with the regulatory requirements set forth in the applicable provisions of the Bank Secrecy Act, US PATRIOT Act and OFAC regulations, DTCC has implemented a Bank Secrecy Act, Anti-Money Laundering and Office of Foreign Assets (OFAC) Compliance Program. This program compliments and strengthens existing DTCC practices with regard to anti-money laundering and OFAC, and demonstrates DTCC's strong commitment to comply with all applicable laws and regulations designed to combat anti-money laundering and illegal activity.

On a regularly scheduled basis, data extracts from various DTC files are run through a filtering system to identify whether any apparent individuals or entities appear on the various OFAC lists. The Office of Corporate and Regulatory Compliance personnel reviews the results of these screenings to determine whether the data matches an individual or entity on one of the OFAC lists.

DTC uses a vendor software product that is designed to filter payment transactions and data files from multiple applications for potential violations of OFAC sanctions and embargoes. This software also contains a database of blocked and specially designated individuals or entities that are sanctioned under the laws administrated by OFAC, enhanced with information from various government agencies, such as the Federal Bureau of Investigation (FBI) and other reference sources. The product searches the federal bulletin boards several times daily for changes to the US Treasury lists. When changes occur it updates the database and distributes the updated files, usually within one day of the changes.

DTC performs a daily scan of all registrations for custody certificates held in its Vault against the OFAC Specially Designated Nationals and Blocked Persons list. After a first review of the scan results to identify and remove "false positives", DTC presents the potential matches ("pending review" items) items to participants via the OFAP PTS function at approximately 11:00 a.m. eastern standard time each day.

DTC also screens all transfer instructions throughout the day as they are submitted by participants against the OFAC list. These transfer instructions include withdrawals-by-transfer ("WTs"), rush WTs, custody WTs, rush custody WTs, custody deposits-into-transfer, restricted deposit service ("RDS") transfers and rush RDS transfers. After a first review of the scan results to identify and remove "false positives", DTC presents the "pending review" items to participants via the PTS function OFAP at different times throughout the day depending on the systemic and operational cutoff times for the various services.

Participants are required to review their "pending review" items via the OFAP function (comparing the custody certificate registration or transfer instruction to the OFAC text information) and respond with factual information sufficient for DTC to conclude, in its discretion, that the name(s) are or are not the persons or entities in the OFAC text. For example, if the name is that of an individual, the participant should provide information about the individual sufficient to negate or confirm the identifying information that appears in the OFAC text, such as address, citizenship/residency, date of birth, passport number/country of issuance, etc. If the name is that of an organization, the participant should provide information sufficient to negate or confirm the identifying information in the OFAC text, such as legal entity name, address, country of incorporation, etc.

Participants use the OFAP function to review and respond, with comments, to potential matches identified by DTC during its OFAC screening of securities transfer instructions received from participants, custody certificates held in its Vault, deposits received from non-US participants and other processes where transactions are screened. The potential match items are classified as "pending review" items in the OFAP function.

Procedures

Viewing and Adding Comments to Custody Registration Items Awaiting Comments

Use this procedure when you want to view or enter comments for new custody registrations "pending review" (PR) or "true hit" (TH) status where you have not made any comments on any certificate in the deposit that has been flagged as a possible OFAC violation.

1 Type S in the Select Product field next to Custody Registration.

The Review Current Scan Results screen appears.

- 2 Type 1 in the Option field.
- 3 Press ENTER.

The Scan Results *CID* Summary Custody *Registration * Scan screen appears displaying a list of deposits that meet the criteria you selected.

4 Type S in the SEL field to the left of a selected item and press Enter. The Scan Results - Certificate Summary Custody *Registration * Scan screen appears displaying information for certificates in Pending Review (PR) or True Hit (TH) status.

Note: An asterisk (*) next to a status is an indication that comments have already been added.

5 Type **S** in the **SEL** field to the left of a selected item. Press **ENTER**.

The Scan Results - Certificate Detail screen appears displaying certificate details.

Note: There could be multiple sanctioned entities identified for each potential match item. The user should pay attention to the number of pages to review at the top right hand corner of the screen. In order to view the multiple sanctioned entities, the user will have to press the **PF11** key to scroll forward. It is possible that each sanctioned entity, may have additional profile information (e.g. aliases, alternate addresses, and alternate DOB) that can be displayed by pressing the **PF9** key, to view the additional details. A message at the top of the screen will indicate if there is additional information to view.

- 6 Press **PF3** to access the Assign Comments screen.
- 7 In the Enter Comment field on the Assign Comments screen, type your comments. Note: Comments should provide factual information, enough for DTC to conclude, in its discretion that the registered holder is or is not the person or entity in the OFAC text. For example, if the registered holder identified on the certificate is an individual, the participant should provide information about the individual sufficient to negate or confirm the identifying information that appears in the OFAC text, such as, date of birth, passport number/country of issuance, address, citizenship/residency, etc. If the registered holder is an organization, the participant should provide information sufficient to negate or confirm the identifying information in the OFAC text, such as, legal entity name, address, country of incorporation, etc. The following are examples of certificate registrations, the related OFAC text, and the language and format required by DTC:

Example 1 (Individual)

<u>Certificate Registration</u>

John Doe

• OFAC Text

Doe, John (country of residence or citizenship), passport # 98765432, DOB x/x/1958

OFAP Comment

Our records indicate that John Doe is not a valid match to the OFAC text because the registered holder's date of birth is x/x/1964. Passport issued by (country) number is 12345678.

Example 2 (Organization)

<u>Certificate Registration</u>

ALA & Co

OFAC Text

Armed Liberation Army, Alias: ALA, (country of affiliation or incorporation)

OFAP Comment

Our records indicate that ALA & Co. is not a valid match to the OFAC text because the registered holder's legal entity name is American Legal Associates & Company and it is incorporated in the U.S.

- 8 In the Assign Comment to Entire Deposit field, type Y to assign the comment to all the certificates in the deposit that meet the criteria, or N to assign the comment only to the selected certificate
- 9 Press PF1 to update.

Note: You can press PF2 to view previously added comments.

Viewing and Adding Comments to Custody Registration Items With Previously Added Comments

Use this procedure when you want to view and comment on a custody registration item in pending review (PR) or true hit (TH) status, where you have previously commented on at least one certificate in the deposit.

- **1** Type **S** in the **Select Product** field next to Custody Registration on the Office of Foreign Assets Control Main Menu.
- 2 Type 2 in the Option field and press ENTER. The Scan Results *CID* Summary *Custody Registration* Scan screen appears displaying a list of items awaiting a response (pending review or true hits) that already have comments assigned to them.
- **3** Type **S** in the **SEL** field to the left of a selected item.

The Scan Results - Certificate Summary *Custody Registration* Scan screen appears displaying information for certificates in pending review (PR) or true hit (TH) status.

4 Type **S** in the **S** field to the left of a selected item.

The Scan Results - Certificate Detail screen appears displaying certificate details

Note: There could be multiple sanctioned entities identified for each potential match item. The user should pay attention to the number of pages to review at the top right hand corner of the screen. In order to view the multiple sanctioned entities, the user will have to press the **PF11** key to scroll forward. It is possible that each sanctioned entity, may have additional profile information (e.g. aliases, alternate addresses, and alternate DOB) that can be displayed by pressing the **PF9** key, to view the additional details. A message at the top of the screen will indicate if there is additional information to view.

- 5 Press **PF2** to view the comments you previously entered for the certificate.
- 6 Press **PF3** to access the Assign Comments screen where you can enter additional comments.
- 7 In the Enter Comment field on the Assign Comments screen, type your comments. Note: Comments should provide factual information, enough for DTC to conclude, in its discretion that the registered holder is or is not the person or entity in the OFAC text. For example, if the registered holder identified on the certificate is an individual, the participant should provide information about the individual sufficient to negate or confirm the identifying information that appears in the OFGAC text, such as, date of birth, passport number/country of issuance, address, citizenship/residency, etc. If the registered holder is an organization, the participant should provide information sufficient to negate or confirm the identifying information in the OFAC text, such as, legal entity name, address, country of incorporation, etc. The following are examples of certificate registrations, the related OFAC text, and the language and format required by DTC:

Example 1 (Individual)

<u>Certificate Registration</u>

John Doe

OFAC Text

Doe, John (country of residence or citizenship), passport # 98765432, DOB x/x/1958

OFAP Comment

Our records indicate that John Doe is not a valid match to the OFAC text because the registered holder's date of birth is x/x/1964. Passport issued by (country) number is 12345678.

Example 2 (Organization)

<u>Certificate Registration</u>

ALA & Co

• OFAC Text

Armed Liberation Army, Alias: ALA, (country of affiliation or incorporation)

OFAP Comment

Our records indicate that ALA & Co. is not a valid match to the OFAC text because the registered holder's legal entity name is American Legal Associates & Company and it is incorporated in the U.S.

- 8 In the Assign Comment to Entire Deposit field, type Y to assign the comment to all the certificates in the deposit that meet the criteria, or N to assign the comment only to the selected certificate.
- 9 Press PF1 to update.

Viewing and Adding Comments to New Transfer Items Awaiting Comments Scanning Individual Items

Use this procedure when you want to view or enter comments to transfer items in "pending review" (PR) or "true hit" (TH) status where you have not made any comments on any transfer that has been flagged as a possible OFAC violation.

1 Type **X** next to one of the following:

- WT
- Rush WT
- Custody WT/Rush WT
- Custody Deposits Into Transfer
- RDS Transfer
- 2 Type 1 in the Option field on the Office of Foreign Assets Control Main Menu and press Enter.
- **3** Type **S** in the **SEL** field to the left of a selected item and press **Enter**.

Note: An asterisk (*) next to a status is an indication that comments have already been added.

If there is only one transfer instruction, the Scan Results - Registration Details screen appears displaying registration information for transfer instructions in Pending Review (PR) or True Hit (TH) status.

If there are multiple transfer instructions, the Scan Results - Registration Breakdown screen appears displaying a line item for each registration.

4 Type **S** in the **SEL** field to the left of a selected line item and press **ENTER** to access the Scan Results - Registration Details screen.

The Scan Results - Registration Summary screen for the product type you selected appears displaying a list of transactions awaiting comments.

Note: There could be multiple sanctioned entities identified for each potential match item. The user should pay attention to the number of pages to review at the top right hand corner of the screen. In order to view the multiple sanctioned entities, the user will have to press the **PF11** key to scroll forward. It is possible that each sanctioned entity, may have additional profile information (e.g. aliases, alternate addresses, and alternate DOB) that can be displayed by pressing the **PF9** key, to view the additional details. A message at the top of the screen will indicate if there is additional information to view.

- 5 Press **PF3** to access the Assign Comments screen.
- 6 In the Enter Comment field on the Assign Comments screen, type your comments.

Note: Comments should provide factual information, enough for DTC to conclude, in its discretion that the person or entity is or is not the person or entity that appears in the OFAC text. For example, if the transfer instruction is for an individual, the participant should provide information about the individual sufficient to negate or confirm the identifying information that appears in the OFAC text, such as, date of birth, passport number/country of issuance, address, citizenship/residency, etc. If the transfer instruction is for an organization, the participant should provide information sufficient to negate or confirm the identifying information in the OFAC text, such as, legal entity name, address, country of incorporation, etc. The following are examples of transfer instructions, the related OFAC text, and the language and format required by DTC:

Example 1 (Individual)

• Transfer Instruction

John Doe 101 Main St. New York, NY 12345

• OFAC Text

Doe, John (country of residence or citizenship), passport # 98765432, DOB x/x/1958

OFAP Comment

Our records indicate that John Doe is not a valid match to the OFAC text because the registered holder's date of birth is x/x/1964. Passport issued by (country) number is 12345678.

Example 2 (Organization)

• Transfer Instruction

ALA & Co. 500 Main St. New York, NY 12345

OFAC Text

Armed Liberation Army, Alias: ALA, (country of affiliation or incorporation)

OFAP Comment

Our records indicate that ALA & Co. is not a valid match to the OFAC text because the registered holder's legal entity name is American Legal Associates & Company and it is incorporated in the U.S.

7 Press **PF1** to update.

Viewing and Adding Comments to Transfer Items With Previously Added Comments

Use this procedure when you want to view or enter comments to transfer items in "pending review" (PR) or "true hit" (TH) status where you have previously commented on at least one certificate in the transfer.

- **1** Type **X** next to one of the following:
 - WT
 - Rush WT
 - Custody WT/Rush WT
 - Custody Deposits Into Transfer
 - RDS Transfer
- **2** Type **2** in the **Option** field on the Office of Foreign Assets Control Main Menu and press **Enter**.

The Scan Results - Registration Summary screen for the product type you selected appears displaying a list of transactions awaiting comments.

3 Type **S** in the **SEL** field to the left of a selected item and press **Enter**.

Note: An asterisk (*) next to a status is an indication that comments have already been added.

If there is only one transfer instruction, the Scan Results - Registration Details screen appears displaying registration information for transfer instructions in Pending Review (PR) or True Hit (TH) status.

If there are multiple transfer instructions, the Scan Results - Registration Breakdown screen appears displaying a line item for each registration.

4 Type **S** in the **SEL** field to the left of a selected line item and press **ENTER** to access the Scan Results - Registration Details screen.

Note: There could be multiple sanctioned entities identified for each potential match item. The user should pay attention to the number of pages to review at the top right hand corner of the screen. In order to view the multiple sanctioned entities, the user will have to press the **PF11** key to scroll forward. It is possible that each sanctioned entity, may have additional profile information (e.g. aliases, alternate addresses, and alternate DOB) that can be displayed by pressing the **PF9** key, to view the additional details. A message at the top of the screen will indicate if there is additional information to view.

- 5 Press **PF2** to access the Comments Inquiry screen.
- 6 Press **PF3** to access the Assign Comments screen.
- 7 In the Enter Comment field on the Assign Comments screen, type your comments.

Note: Comments should provide factual information, enough for DTC to conclude, in its discretion that the person or entity is or is not the person or entity that appears in the OFAC text. For example, if the transfer instruction is for an individual, the participant should provide information about the individual sufficient to negate or confirm the identifying information that appears in the OFAC text, such as, date of birth, passport number/country of issuance, address, citizenship/residency, etc. If the transfer instruction is for an organization, the participant should provide information sufficient to negate or confirm the identifying information in the OFAC text, such as, legal entity name, address, country of incorporation, etc. The following are examples of transfer instructions, the related OFAC text, and the language and format required by DTC:

Example 1 (Individual)

Transfer Instruction

John Doe

101 Main St.

New York, NY 12345

OFAC Text

Doe, John (country of residence or citizenship), passport # 98765432, DOB x/x/1958

OFAP Comment

Our records indicate that John Doe is not a valid match to the OFAC text because the registered holder's date of birth is x/x/1964. Passport issued by (country) number is 12345678.

Example 2 (Organization)

<u>Transfer Instruction</u>

ALA & Co.

500 Main St.

New York, NY 12345

OFAC Text

Armed Liberation Army, Alias: ALA, (country of affiliation or incorporation)

OFAP Comment

Our records indicate that ALA & Co. is not a valid match to the OFAC text because the registered holder's legal entity name is

American Legal Associates & Company and it is incorporated in the $\ensuremath{\mathsf{U.S.}}$

8 Press **PF1** to update.

Viewing and Adding Comments for Manually Scanned Items

Use this procedure when you want to view and comment on a manually scanned item in pending review (PR) or true hit (TH) status, or to add comments to items with previously added comments.

- **1** Type **X** in the **Select Product** field next to **Scanned Items Pending Review**.
- **2** Type **1** in the **Option** field to review and comment on new items or, **2** to add new comments to items with previously added comments.
- **3** Press **ENTER**.

The Scan Results – Generic Summary screen appears displaying a list of deposits that meet the criteria you selected.

4 Type **S** the **SEL** field to the left of a selected item. Press **ENTER**.

The Scan Results - Generic Detail screen appears displaying details.

Note: There could be multiple sanctioned entities identified for each potential match item. The user should pay attention to the number of pages to review at the top right hand corner of the screen. In order to view the multiple sanctioned entities, the user will have to press the **PF11** key to scroll forward. It is possible that each sanctioned entity, may have additional profile information (e.g. aliases, alternate addresses, and alternate DOB) that can be displayed by pressing the **PF9** key, to view the additional details. A message at the top of the screen will indicate if there is additional information to view.

- **5** Press **PF2** to access the Comments Inquiry screen.
- 6 Press PF3 to access the Assign Comments screen where you can enter additional comments.
- 7 In the **Enter Comment** field on the Assign Comments screen, type your comments.

Note: Comments should provide factual information, enough for DTC to conclude, in its discretion that the registered holder is or is not the person or entity in the OFAC text. For example, if the registered holder identified on the certificate is an individual, the participant should provide information about the individual sufficient to negate or confirm the identifying information that appears in the OFGAC text, such as, date of birth, passport number/country of issuance, address, citizenship/residency, etc. If the registered holder is an organization, the participant should provide information sufficient to negate or confirm the identifying information in the OFAC text, such as, legal entity name, address, country of incorporation, etc. The following are examples of certificate registrations, the related OFAC text, and the language and format required by DTC:

Example 1 (Individual)

• Certificate Registration

John Doe

• OFAC Text

Doe, John (country of residence or citizenship), passport # 98765432, DOB x/x/1958

OFAP Comment

Our records indicate that John Doe is not a valid match to the OFAC text because the registered holder's date of birth is x/x/1964. Passport issued by (country) number is 12345678.

Example 2 (Organization)

<u>Certificate Registration</u>

ALA & Co

• OFAC Text

Armed Liberation Army, Alias: ALA, (country of affiliation or incorporation)

OFAP Comment

Our records indicate that ALA & Co. is not a valid match to the OFAC text because the registered holder's legal entity name is American Legal Associates & Company and it is incorporated in the U.S.

- 8 In the **Assign Comment to Entire Deposit** field, type **Y** to assign the comment to all the certificates in the deposit that meet the criteria, or **N** to assign the comment only to the selected certificate.
- 9 Press **PF1** to update.

Screens and Field Definitions

Main Menu

QAAD	OFFICE OF FOREIGN ASSETS CONTROL MAIN MENU	DATE: 06/17/08 TIME: 14:12:14
SELECT PRODUCT (REQUIRED)	==> CUSTODY REGISTRATION WT RUSH WT CUSTODY WT/RUSH WT CUSTODY DEPOSITS INTO TRANSFER RDS TRANSFER SCANNED ITEMS PENDING REVIEW	NEW ITEMS 2 1 0 0 0 0 1
1) 2)	REVIEW AND COMMENT ON NEW ITEMS ADD ADDITIONAL COMMENTS TO ITEMS PREVIOUSL	Y RESPONDED TO
	OPTION:	
ENTER: PROCESS	PF8: END FUNCTION	PF9: SIGNOFF 07/23

This field	Allows you to					
New Items	To view the number of new transactions for each product type that are awaiting response. However, if there are items that were previously responded to that require additional information, they will not be reflected in this count. These should be accessed by selecting Option 2 to provide additional information.					
Option	 Type one of the following: 1: to review and comment on new items 2: to add additional comments for items previously responded to 					
Select Product	Type X next to one of the following: Custody Registration WT Rush WT Custody WT/Rush WT Custody Deposits Into Transfer RDS Transfer Scanned I tems Pending Review					

UDF Data/Additional Information Screen

		OFFICE (UI	OF FOREIG DF DATA I	N ASSET NFORMAT	S CON ION	ITROL		DATE: TIME:	06/17 14:09	7/08 9:58
SDN KE	Y: 187009						PAG	E: 00	01 0	0001
00001	Originals OFAC	Source								
00002	Aliases HARA INSI	TITUTE								
PF6: P	REV PF7:	MAIN MENU	PF8: END	FUNC	PF9:	SIGNOFF	PF10:	BACK	PF11	FWRD
48		0:00.3								01/01

This field	Allows you to
SDN Key	View the entity reference number.

Custody Registration Screens

Scan *Results* -*CID* Summary Custody *Registration* Scan

*****	****	******		****
****	[#] [#] OFF.	CE OF FOREIGN ASS CAN*RESULTS*-*CIE CUSTODY*REGISTRAT	SETS CONTROL)*SUMMARY TION*SCAN	DATE: ********* TIME: ******* PAGE: ***
SEL CUS	IP CONTROL	ID ACCOUN	T ID DEP*DAT	E EFFECT SCAN DT
s 45920 . 19121	0101 20050901AB	1234 G123ER1 5678 5543244141	1999101 124124 2001010	8 2005-09-01 5 2005-09-01
			*** vo v	
PF6: PREV	PF7: MENU P	8: END FUNC PF9:	SIGNOFF PF10: B	ACK PF11: FWD
48	@:00.3			09/06

This field	Allows you to
Account ID	View the customer account identification number.
Control ID	View the deposit control identification number.
CUSIP	View the CUSIP number for the deposited security.
Dep* Date	View the date on which the security was deposited.
Effect Scan Dt	View the date on which the deposit was scanned and flagged as a possible OFAC violation.
SEL	Type S to access the Certificate Summary screen.

Scan *Results* - Certificate Summary Custody *Registration* Scan Screen

****	***	********	*****
**********************	******************************	**************	********
****	OFFICE OF FOREIGN ASSETS CO	NTROL DATE	常常常常常常常常常
***** S	CAN RESULTS - CERTIFICATE S	UMMARY TIME	*********
	CUSTODY*REGISTRATION*SC	AN PAGE	****
*****	PART*TD:	TOTAL CERTS IN	DEPOSIT: 002
CID: 20050901ABC 1234	CUSIP: 459200101 SELECT	ED / FLAGGED CERT	rs: 002 / 002
		,	EFFECT OFAC
S CERTIFICATE 1	ST LINE OF REGISTRATION	QUANTITY	SCAN DT STAT
		1000	20050001
S CERTI JOHN SM	11 TH	1000	20050901 PR*
S CERTZ JOHN SM	11 TH	500	20050901 PR
		*** NO.MORE.D	DATA ***
PF1: UPDATE*CID ENTER	ENTER 'S' IN THE S COLUMN	TO VIEW CERTIFIC	ATE DETAIL
PF6: PREV PF7: MENU	PF8: END FUNC PF9: SIGN	OFF PF10: BACK	PF11: FWD
48 ():	00.1		07/77

This field	Allows you to
1st Line of Registration	View the name of the registered owner of the certificate.
Certificate	View the certificate number.
CID	View the customer account identification number.
CUSIP	View the CUSIP number for the deposited security.
Effect Scan Dt	View the date on which the deposit was scanned and flagged as a possible OFAC violation.
OFAC Stat	View the OFAC status under which the certificate is flagged.
Part *ID	View your participant identification number.
Quantity	View the certificate amount.

S	Type S to access the Certificate Detail screen.
Selected/Flagged Certs	View the number of certificates in the deposit that are flagged.
Total Certs in Deposit	View the total number of certificates in the deposit.

Certificate Detail Screen (Custody)

PRESS F9 TO VIEW A	DDITIONAL INFO FOR OFFICE OF FORE SCAN RESULTS -	THIS IGN AS CERTIN	ENTITY SETS CONTR ICATE DETA	KOL AIL	DATE: 06/17/08 TIME: 14:00:20 PAGE: 001 OF 001
OFAC STATUS: PR		\$e \$e \$	EFFECTIVE	SCAN DATE	: 2008-06-11 ***
				- REGISTRA	TION
CUSIP: 090994351	PFD BILL ME "4"	+	HARE		
CID : 20080101ABC	D0001				
BOX : 0000901					
OTY : 1.00	000				
CERT 0000000000	0				
ACCT 1234567890	0				
	OFAC SCA	N RESI	II TS		
088% HARA COMPANY	VIAC DEA		215		
ooolii hhida com hin		SRC	OFAC SDN	LIST	
ADDR :		Bite	orne bon		
CITY: TEHRAN		CNTRY	TRAN TSLA	MTC REPUBL	TC OF
TYPE: COMPANY	AFF	CNTRY	NPWMD		
ADDR2: ALTASES: HAL	RA INSTITUTE				
STATE:	PASSPORT:				DOB: 01/01/01
SDN KEY: 187009	CREATED: 10/25/07	(HANGED: 10)/25/07	TOLERANCE: 080%
PF2:	VIEW CMTS PE3:	ENTER	CMTS		PE5: FAX/EMATL
PF6: PREV PF7: MEN	U PF8: END PF9: I	MORE 1	NFO PF10:	BWD PF11:	FWD
48	@:00.1				06/15

This field	Allows you to
Unnamed field	View the match rate and sanctioned entity name.
(088% Hara Company)	
Acct	View the customer account number.
Addr	View the address of the entity.
Addr 2	View "Watch List" text information.
Aff Cntry	View "Watch List" text information.
Вох	View the custody vault box location.
Cert	View the number under which the certificate is listed.
Changed	View the date the information was changed in the system.

CID	View the deposit control number.
City	View the city in which the entity is located.
Cntry	View the country of the entity.
Created	View the date the information was added in the system.
CUSIP	View the CUSIP number for the deposited security.
DOB	View the date of birth of the entity.
Effective Scan Date	View the date on which the deposit was scanned and flagged as a possible OFAC violation.
OFAC Status	View the OFAC status under which the certificate is flagged.
Passport	View the passport number of the entity.
Qty	View the certificate amount.
Registration	View the registration information associated with the certificate.
SDN Key	View the entity reference number.
Src	View the source of the information.
State	View the state in which the entity is located.
Tolerance	View the screening tolerance level.
Туре	View the category to which entity belongs i.e., country, city, individual, vessel, organization, or other.

Assign Comments Screen (Custody)

***************************************	****************	*******************	*******
**************************************	GN ASSETS CONTRON N COMMENTS	DL DATE: TIME:	****
** PROVIDE INFORMATION ABOUT THE R ** DTC DETERMINE IF THE POSSIBLE M	EGISTERED OWNER(S	S) ON THE CERTIFICA POSITIVE OR A VALID	ATE TO HELP D MATCH
CID: 20050901ABC 1234 CERTIFI	CATE: CERT1		
ENTER COMMENT: THE JOHN SMITH ON THE CERTIFICATE DATE IS NOT 1/2/1954. WE CERTIFY	IS NOT THE MINIS THAT THIS HIT IS	STER OF FINANCE AND NOT A VALID MATCH.	D HIS BIRTH
ASSIGN COMMENT TO ENTIRE DEPOSIT:	N		
=> ENTER 'Y' TO ASSIGN O DEPOSIT THAT MEET THE	MMENTS TO ALL CO SELECTION CRITER	ERTIFICATES FOR THI RIA	IS
=> ENTER 'N' TO ASSIGN O	OMMENTS TO THIS (CERTIFICATE ONLY	
PF1: ENTER COMMENT PF6: PREV SCRN PF7: MAIN ME	NU PF8: EN	D FUNCTION P	9: SIGNOFF
48 (0.3			16/36

This field	Allows you to
Assign Comment To Entire Deposit	Type \mathbf{Y} (yes) to assign comments to all the certificates on the screen or \mathbf{N} (no) to assign comments only to the selected certificates.
Certificate	View the certificate number.
CID	View the deposit control identification number.
Enter Comments	Type freeform comments related to the registered holder of the certificate, providing factual information sufficient for DTC to conclude, in its discretion, that the name(s) on the certificate are or are not the persons or entities in the OFAC text. For example, if the registered holder is an individual, the participant should provide information about the individual sufficient to negate or confirm the identifying information that appears in the OFAC text, such as, date of birth, passport number/country of issuance, address, citizenship/residency, etc. If the registered holder is an organization, the participant should provide information sufficient to negate or confirm the identifying information, the participant should provide information sufficient to negate or confirm the identifying information, the participant should provide information sufficient to negate or confirm the identifying information in the OFAC text, such as legal entity name, address, country of incorporation, etc

Comments Inquiry Screen (Custody)

***	***	*****	***
*******	************	******	*****
****	OFFICE OF FOREIGN	ASSETS CONTROL	DATE: *********
****	COMMENTS INC	UIRY	TIME: *******
		•	PAGE: ****
COMMENTS*DATE/TIME:	2005-09-11-13.21.11	123456 USER*ID: 00000	00000
OUR RECORDS INDICAT	TE THAT JOHN SMITH IS	NOT A VALID MATCH TO	THE OFAC TEXT
BECAUSE THE REGISTE	RED HOLDER'S DATE OF	BIRTH IS XX/XX/1964,	PASSPORT ISSUED
BY THE UNITED STATE	ES, NUMBER IS 12345678	3.	
		UCED \$TD.	
CUMMENTS^DATE/TIME:	<u> </u>	USER~1D:	
••••••			
COMMENTS*DATE/TIME:		USER*ID:	
	_	**** NO*	MORE*DATA ***
PF6: PREV SCREEN	PF7: MAIN MENU	PF8: END FUNC	PF9: SIGNOFF
PF10: PAGE BACK			PF11: PAGE FWD
4 <u>8</u>	():00.1		12/22

This field

Comments *Date/Time

User*ID

Transfer Instruction Screens

Scan Results AWT (or other transfer product) Registration Screen

00000 QAAE	-01	OFFICE OF FOREIGN ASSETS SCAN RESULTS AWT REGISTRATION SUM	5 CONTROL 1MARY	DATE: TIME: PAGE:	12/22/05 16:21:38 001
SEL	CUSIP	SCAN ID	STATUS	EFFECT SCAN D	Г
S 	09161R106 254687106	200512130002448 200512140002649	PR PR	2005-12-15 2005-12-15	
				*** NO MOI	RE DATA ***
STATUS	OF '**' INDI PF7: ME	CATES THIS TRANSACTION HAS NU PF8: END FUNC PF9:	MULTIPLE SIGNOFF	REGISTRATION: PF10: BACK	S PF11: FWD

This field	Allows you to
CUSIP	View the CUSIP number for the transfer instruction security.
Effect Scan Dt	View the date on which the transaction was scanned and flagged as a possible OFAC violation.
Scan ID	View the transaction identification number.
SEL	Type \mathbf{S} to access the registration breakdown details if there are multiple registrations or the registration details if there is only one registration.
Status	View the status of the transaction. If an item has multiple registrations two asterisks (**) appear next to the status.

Scan Results Custody WT (or other transfer product) Registration Breakdown Screen

QAAC .	•47 OFFICE OF FOREIGN ASSET SCAN RESULTS CUSTODY WT REGISTRATION	TS CONTROL BREAKDOWN	DATE: 12/22 FIME: 16:34 PAGE: 001	/05 :27
SCAN ID: REG S SQ	2004081801640009 CUSIP: 80861L996 1ST LINE OF REGISTRATION	TOTAL REGS FOR SELECTED/FLAGGED QUANTITY	R TRANSFER: REGS: 002 EFFECT SCAN DT	002 / 002 OFAC STAT
s 001 002		.00000 .00000	12/19/05 12/19/05	PR* TH*
ENTER 'S PF6: PREV	IN THE 'SELECT' COLUMN AND PRESS 'E / PF7: MENU PF8: END FUNC PF9:	*** NO MOF ENTER' TO VIEW SCAN SIGNOFF PF10: BA	RE DATA *** N DETAIL ACK PF11:	FWD

This field	Allows you to
1st Line of Registration	View text for the first line of the registration.
CUSIP	View the CUSIP number for the transfer instruction security.
Effect Scan Dt	View the date on which the transaction was scanned and flagged as a possible OFAC violation.
OFAC Stat	View the status of the transaction. If an item has already been commented on an asterisk (*) appears next to the status.
Quantity	View the quantity of the transaction.

Reg Sq	View the registration sequence number.
S	Type S to view registration details.
Scan ID	View the transaction identification number.
Selected/Flagged Regs	View the number of registrations flagged.
Total Regs For Transfer	View the total number of registrations for this transaction.

Scan Results - AWT (or other transfer product) Registration Details Screen

OFFICE OF FOREIGN AS	SETS CONTROL	DATE: 06/17/08
*** EFFECTIVE SCAN DATE:	2008-05-14 ***	PAGE: 001 OF 001
OFAC STATUS: PR	REGISTR	ATION
	JOHN JONES	
CUSIP : 459200101 INTER BUSINESS MACH<	VICTORIA	
TAX ID : 123-45-6789	BC	
QTY : 1.00000		
AWT UNIQUE ID: 1234567890		
	TC	
083% VICTORIA POTES, NESTOR RAUI		
SRC:	OFAC SDN LIST	
ADDR: C/O INDUSTRIA AVICOLA PALMASECA S.A.		
CITY: CALI CNTRY:	COLOMBIA	
ADDR2: CEDILLA NO: 16247701 (CO)	SUNT	
STATE: PASSPORT:	DOB:	11/25/51
SDN KEY: 008197 CREATED: 03/06/96 CH	ANGED: 10/28/04	TOLERANCE: 080%
PF2: VIEW CMTS PF3: ENTER	CMTS	
PF6: PREV PF7: MENU PF8: END	PEIO: BWD PEII	FWD
AB (0:00.1		06/15

This field	Allows you to
Unnamed field (083% Victoria Potes, Nestor Raul)	View the match rate and sanctioned entity name.
Addr	View the customer account number.
Addr 2	View "Watch List" text information.
Aff Cntry	View "Watch List" text information.

AWT (or other product) Unique ID	View the unique identification number of the transfer instruction.
Changed	View the date the information was changed in the system.
City	View the city in which the entity is located.
Cntry	View the country of the entity.
Created	View the date the information was added to the system.
CUSIP	View the CUSIP number for the transaction.
OFAC Status	View the OFAC status under which the transaction is flagged.
Passport	View the passport number of the entity.
Qty	View the transaction amount.
Registration	View the registration information associated with the transaction.
Scan ID	View the transaction identification number.
SDN Key	View the entity reference number.
Src	View the source of the information.
State	View the state in which the entity is located.
Tax ID	View tax identification number.
Tolerance	View the screening tolerance level.

Assign Comments Screen (Transfer) Screen

0000 QAAE	-01 0	FFICE OF FOREIGN ASS ASSIGN COMME	ETS CONTROL ENTS	DATE: 12/22/05 TIME: 17:00:33
** PROVI ** INSTR ** OR A	DE INFORMATIO UCTION TO HEL VALID MATCH	N ABOUT THE REGISTER P DTC DETERMINE IF 1	RED OWNER(S) ON THE THE POSSIBLE MATCH	RE-REGISTRATION IS A FALSE POSITIVE
SCAN ID	: 20051213000	2448 REG SQ: 001		
ENTER CO OUR RECO BECAUSE BY THE	DMMENT: DRDS INDICATE THE REGISTER UNITED STATES	THAT JOHN SMITH IS ED HOLDER'S DATE OF , NUMBER IS 12345678	NOT A VALID MATCH BIRTH IS XX/XX/196	TO THE OFAC TEXT 4, PASSPORT ISSUED
PF1: EN PF6: PR	TER COMMENT EV SCRN	PF7: MAIN MENU	PF8: END FUNCTIO	N PF9: SIGNOFF

This field	Allows you to
Enter Comments	Type freeform comments related to the transfer instruction providing factual information sufficient for DTC to conclude, in its discretion, that the name(s) in the transfer instructions are or are not the persons or entities in the OFAC text. For example, if the transfer instruction is for an individual, the participant should provide information about the individual sufficient to negate or confirm the identifying information that appears in the OFAC text, such as, date of birth, passport number/country of issuance, address, citizenship/residency, etc. If the transfer instruction is for an organization, the participant should provide information sufficient to negate or confirm the identifying information in the OFAC text, such as legal entity name, address, country of incorporation, etc.
Reg Sq	View the registration sequence number.
Scan ID	View the transaction identification number.

Manual Scan Screens

Scan Results - Generic Summary Screen

	OFFI SCA	CE OF FOREIG N RESULTS -	IN ASSETS CON GENERIC SUMM	ITROL IARY	DATE: TIME: PAGE:	06/18/08 09:14:32 001
SEL	SCAN ID	STAT	SCAN DATE	FIRST	FIELD WITH	DATA
H200	8061700002	PR	2008-06-17	SADDAM	HUSSEIN	
TO SELEC	T ENTER "S" IN THE	SEL COLUMN	AND PRESS EN	ITER	*** NO MOR	RE DATA ***
	PF7: MENU PF	8: END FUNC	PF9: SIGN	OFF PI	F10: BACK	PF11: FWD
48	@:01.0					10/03

This field	Allows you to
First field with data	View the first line of the name scanned.
Scan Date	View the date on which the item was scanned and flagged as a possible OFAC violation.
Scan ID	View the transaction identification number.
Stat	View the OFAC status under which the item is flagged.
Sel	Type S to access the Generic Detail screen.

Scan Results - Generic Detail Screen

PRESS F9 TO VIEW ADDITIONAL INFO FO OFFICE OF FO	OR THIS ENTITY REIGN ASSETS CONTROL DATE: 06/17/08
SCAN TD: H2008061700002	DAGE: 001 OF 005
OFAC STATUS: PR	PARTICIPANT: 00002193
1: SADDAM HUSSETN	
4:	
2:	
5:	
3:	
_ 6:	
7:	
OFAC S(CAN RESULTS
100% HUSSEIN, SADDAM	
	SRC: UFAC SUN LIST
ADDR: POB: AL-AWJA, NEAK TIKKIT, IN	CNTRY: TRAC
	CNTRV: TRAC
ADDR2: FORMER PRESIDENT NAMED IN U	NSCR 1483 ALTASES: HUSSETN, SADDAM
STATE: PASSPORT:	DOB: 04/28/37
SDN KEY: 006718 CREATED: 01/13/	95 CHANGED: 07/30/04 TOLERANCE: 075%
PF2: VIEW CMT	S PF3: ENTER CMTS
PF6: PREV PF7: MENU PF8: END PF9	: MORE INFO PF10: BWD PF11: FWD
18 (0 : 00 . 1	06/15

This field	Allows you to
Unnamed field (100% Hussein, Saddam)	View the match rate and sanctioned entity name.
1-7	View the name and address of the entity being screened.
Addr	View the address of the entity.
Addr 2	View "Watch List" text information.
Aff Cntry	View "Watch List" text information.
Changed	View the date the information was changed in the system.
City	View the city in which the entity is located.

Cntry	View the country of the entity.
Created	View the date the information was added in the system.
DOB	View the date of birth of the entity.
OFAC Status	View the OFAC status under which the item is flagged.
Participant	View your participant number.
Passport	View the passport number of the entity.
Scan ID	View the scan identification number.
SDN Key	View the entity reference number.
Src	View the source of the information.
State	View the state in which the entity is located.
Tolerance	View the screening tolerance level.
Туре	View the category to which entity belongs i.e., country, city, individual, vessel, organization, or other.