



September 26, 2003

USA Patriot Act

To All Sunset Branches that close loans through Wholesale

Purpose This communication reminds Correspondents that the USA Patriot Act (USAPA) of 2001, Section 326 joint rule applies to mortgage loan applications taken by “financial institutions” on and after October 1, 2003 and that result in a new account being opened. Financial institutions include: banks and trust companies, savings associations, credit unions, securities brokers and dealers, mutual funds and futures commissions merchants and futures introducing brokers.

Background The USAPA requires that, at a minimum, financial institutions implement reasonable procedures for:

- Obtaining the following information prior to opening an account:
 - o Name
 - o Address
 - o Date of Birth
 - o Identification Number (social security number)
- Verify the identity of any person applying for a mortgage loan, to the extent reasonable and practical
- Maintain records of the information used to verify the person’s identity, including name, address and other identifying information, and
- Determining whether the person appears on any lists of known or suspected terrorists or terrorist organizations provided to the financial institution by any government agency
