

**EXHIBIT A**  
**CTA Checklist for Commercial Real Estate Attorneys**

**(a) Attorney's Representation Agreement**

- Did representation agreement address the CTA and any required disclosures?
- Did representation agreement provide an obligation for client to cooperate with any disclosure requirements?
- Did representation agreement include an indemnity to the attorney for any inaccurate information provided by the client?

**(b) Role of Closing Attorney**

- Did attorney form a North Carolina Business Entity?
- Did attorney qualify a foreign (international) Business Entity to do business in the U.S.?
- Did attorney amend the beneficial ownership of a pre-existing Business Entity?
- Does attorney otherwise fit within the definition of an Applicant?

**(c) Compliance requirement: Reporting Companies**

- Identify Beneficial Owner(s): \_\_\_\_\_
- Identify Applicant(s): \_\_\_\_\_

**(d) Compliance requirement: Information for each Beneficial Owner(s) and/or Applicant(s) to Report to FinCEN**

Full Legal Name: \_\_\_\_\_  
Date of Birth: \_\_\_\_\_  
Current Residential or Business Address: \_\_\_\_\_  
\_\_\_\_\_  
Unique Identifying Number from an Acceptable Identification Document:  
\_\_\_\_\_

Acceptable identification document<sup>1</sup> means:

- (i) a nonexpired passport issued by the U.S.
- (ii) a nonexpired identification document issued by a State, local government or Indian Tribe
- (iii) a nonexpired driver's license
- (iv) if an individual does not have any of the above-listed items, a nonexpired passport issued by a foreign government

**(e) Compliance requirement: Correcting inadvertent reporting errors**

- Identify Incorrectly Reported Information and Safe Harbor Applicability
- Issue a Revised Report to FinCEN within 90 Days

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<sup>1</sup> CTA § 5336(a)(1)

EXHIBIT B  
Bibliography

January 29, 2021	Goldman, Lawrence A. Marella, David J.	“The Corporate Transparency Act: Augmented Federal Anti-Money Laundering Legislation Brings New Reporting Requirements of Company Ownership”  ( <a href="http://www.americanbar.org/groups/business_law/publications">www.americanbar.org/groups/business_law/publications</a> )
April 16, 2021	Downes, Robert W. Ludwig, Scott E. Rutledge, Thomas E. Smiley, Laurie A.	“The Corporate Transparency Act – Preparing for the Federal Database of Beneficial Ownership Information”  ( <a href="http://www.americanbar.org/groups/business_law/publications">www.americanbar.org/groups/business_law/publications</a> )
August 23, 2021	Zirogiannis, Lewis Howard, II, Hershel Jones Noller, Lisa M. Simon, David W. Scott, Jenlain A. C.	“What you need to know about the Corporate Transparency Act”  ( <a href="#">The National Law Review, Vol. XI, #235</a> )