



## Beneficial Ownership Reporting Information Request

Please complete Steps 1 through 4 and return the information to ATLAS for processing.

Consider referencing the BOI Questionnaire at the end of the document to help determine your entity's reporting requirements and beneficial owners.

Contact our office with additional questions

### Step 1: Determine Reporting Requirement

Please review the attached questionnaire and mark whether your entity is subject to Beneficial Ownership reporting:

- Yes: My entity is subject to Beneficial Ownership reporting.
- No: My entity is not subject to Beneficial Ownership reporting.

### Step 2: Identify Beneficial Owners

If you marked "Yes" in Step 1, please list all individuals who are considered beneficial owners according to the criteria outlined in the questionnaire. Beneficial owners include individuals who:

1. Have substantial control over the entity.
2. Hold ownership interests in the entity.

Name	Position/Title	Ownership Percentage

Provide a supplemental schedule if necessary

### Step 3: Verification

Please confirm that you have listed all individuals required to be reported:

- Yes
- No

Client Entity: \_\_\_\_\_

Authorized Signer: \_\_\_\_\_

Date: \_\_\_\_\_

#### \*Please Note\*

We are not able to file the report unless the verification is marked "Yes" and an authorized representative has signed above verifying that the list of beneficial owners is complete and accurate.

If you are unable to confirm a completed list, we advise that you seek legal counsel with regards to your obligations under the Corporate Transparency Act.

## Step 4: Information Required Checklist

### Part I Reporting Entity information:

1a. Articles of Organization

-OR-

1b. Full Legal Name: \_\_\_\_\_

dba, if applicable: \_\_\_\_\_

Jurisdiction of Formation: \_\_\_\_\_

IRS Employer ID Number : \_\_\_\_\_

2. Complete current US address: \_\_\_\_\_

### Part II For each Beneficial Owner and each Company Applicant required to be reported:

Full legal name (including middle name)

Date of birth

Complete current address

Unique identifying number and issuing jurisdiction from one of the following:

- a. US Passport
- b. State/local/tribal issued identification document
- c. State issued driver's license
- d. If none of (a)-(c) are available, a foreign passport

An image of the document from which the unique identifying number was obtained

-OR-

ATLAS can send an invite to you, and you can complete Part II above, including uploading your Document

-OR-

Provide ATLAS with a FinCEN identifier for the beneficial owner(s)

NOTE: Company Applicant information is not required for entities formed or registered before 2024. A Company applicant is the person or entity that is responsible for filling the documents that create or register a reporting company.

**Beneficial Owner/Company Applicant**

Full legal name: \_\_\_\_\_

Option 1 Client provided Information

Date of birth: \_\_\_\_\_

Complete **current** address: \_\_\_\_\_

Type of Identification: \_\_\_\_\_

Identification Number: \_\_\_\_\_

Method to provide Image of ID: \_\_\_\_\_

**-OR-**

Option 2 ATLAS to send invite for information entry

Email Address : \_\_\_\_\_

**-OR-**

Option 3 Provide ATLAS with a FinCEN identifier for the beneficial owner(s)

FinCEN Identifier: \_\_\_\_\_

**Beneficial Owner/Company Applicant**

Full legal name: \_\_\_\_\_

Option 1 Client provided Information

Date of birth: \_\_\_\_\_

Complete **current** address: \_\_\_\_\_

Type of Identification: \_\_\_\_\_

Identification Number: \_\_\_\_\_

Method to provide Image of ID: \_\_\_\_\_

**-OR-**

Option 2 ATLAS to send invite for information entry

Email Address : \_\_\_\_\_

**-OR-**

Option 3 Provide ATLAS with a FinCEN identifier for the beneficial owner(s)

FinCEN Identifier: \_\_\_\_\_

**Beneficial Owner/Company Applicant**

Full legal name: \_\_\_\_\_

Option 1 Client provided Information

Date of birth: \_\_\_\_\_

Complete **current** address: \_\_\_\_\_

Type of Identification: \_\_\_\_\_

Identification Number: \_\_\_\_\_

Method to provide Image of ID: \_\_\_\_\_

**-OR-**

Option 2 ATLAS to send invite for information entry

Email Address : \_\_\_\_\_

**-OR-**

Option 3 Provide ATLAS with a FinCEN identifier for the beneficial owner(s)

FinCEN Identifier: \_\_\_\_\_

**Beneficial Owner/Company Applicant**

Full legal name: \_\_\_\_\_

Option 1 Client provided Information

Date of birth: \_\_\_\_\_

Complete **current** address: \_\_\_\_\_

Type of Identification: \_\_\_\_\_

Identification Number: \_\_\_\_\_

Method to provide Image of ID: \_\_\_\_\_

**-OR-**

Option 2 ATLAS to send invite for information entry

Email Address : \_\_\_\_\_

**-OR-**

Option 3 Provide ATLAS with a FinCEN identifier for the beneficial owner(s)

FinCEN Identifier: \_\_\_\_\_

**Beneficial Owner/Company Applicant**

Full legal name: \_\_\_\_\_

Option 1 Client provided Information

Date of birth: \_\_\_\_\_

Complete **current** address: \_\_\_\_\_

Type of Identification: \_\_\_\_\_

Identification Number: \_\_\_\_\_

Method to provide Image of ID: \_\_\_\_\_

**-OR-**

Option 2 ATLAS to send invite for information entry

Email Address : \_\_\_\_\_

**-OR-**

Option 3 Provide ATLAS with a FinCEN identifier for the beneficial owner(s)

FinCEN Identifier: \_\_\_\_\_

**Beneficial Owner/Company Applicant**

Full legal name: \_\_\_\_\_

Option 1 Client provided Information

Date of birth: \_\_\_\_\_

Complete **current** address: \_\_\_\_\_

Type of Identification: \_\_\_\_\_

Identification Number: \_\_\_\_\_

Method to provide Image of ID: \_\_\_\_\_

**-OR-**

Option 2 ATLAS to send invite for information entry

Email Address : \_\_\_\_\_

**-OR-**

Option 3 Provide ATLAS with a FinCEN identifier for the beneficial owner(s)

FinCEN Identifier: \_\_\_\_\_

**Beneficial Owner/Company Applicant**

Full legal name: \_\_\_\_\_

Option 1 Client provided Information

Date of birth: \_\_\_\_\_

Complete **current** address: \_\_\_\_\_

Type of Identification: \_\_\_\_\_

Identification Number: \_\_\_\_\_

Method to provide Image of ID: \_\_\_\_\_

**-OR-**

Option 2 ATLAS to send invite for information entry

Email Address : \_\_\_\_\_

**-OR-**

Option 3 Provide ATLAS with a FinCEN identifier for the beneficial owner(s)

FinCEN Identifier: \_\_\_\_\_

**Beneficial Owner/Company Applicant**

Full legal name: \_\_\_\_\_

Option 1 Client provided Information

Date of birth: \_\_\_\_\_

Complete **current** address: \_\_\_\_\_

Type of Identification: \_\_\_\_\_

Identification Number: \_\_\_\_\_

Method to provide Image of ID: \_\_\_\_\_

**-OR-**

Option 2 ATLAS to send invite for information entry

Email Address : \_\_\_\_\_

**-OR-**

Option 3 Provide ATLAS with a FinCEN identifier for the beneficial owner(s)

FinCEN Identifier: \_\_\_\_\_

## Exceptions to BOI reporting

### Tax-exempt entity

501(c) of the <a href="#">Internal Revenue Code of 1986</a> (Code) (determined without regard to section 508(a) of the <a href="#">Code</a> ) and exempt from tax under section 501(a) of the <a href="#">Code</a> .	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. The entity is an organization that is described in section 501(c) of the <a href="#">Code</a> , and was exempt from tax under section 501(a) of the <a href="#">Code</a> , but lost its tax-exempt status less than 180 days ago.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The entity is a political organization, as defined in section 527(e)(1) of the <a href="#">Code</a> , that is exempt from tax under section 527(a) of the <a href="#">Code</a> .	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. The entity is a trust described in paragraph (1) or (2) of section 4947(a) of the <a href="#">Code</a> .	<input type="checkbox"/> Yes <input type="checkbox"/> No

### Entity assisting a tax-exempt entity

An entity qualifies for this exemption if all **four** of the following criteria apply:

1. The entity operates exclusively to provide financial assistance to, or hold governance rights over, any tax-exempt entity described by <a href="#">Exemption #19</a> .	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. The entity is a United States person as defined in section 7701(a)(30) of the <a href="#">Internal Revenue Code of 1986</a> .	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The entity is beneficially owned or controlled exclusively by one or more United States persons that are United States citizens or lawfully admitted for permanent residence. “Lawfully admitted for permanent residence” is defined in section 101(a) of the Immigration and Nationality Act ( <a href="#">8 U.S.C. 1101(a)</a> ).	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. The entity derives at least a majority of its funding or revenue from one or more United States persons that are United States citizens or lawfully admitted for permanent residence.	<input type="checkbox"/> Yes <input type="checkbox"/> No



## Large operating company

An entity qualifies for this exemption if all six of the following criteria apply:

<p>1. The entity employs more than 20 full time employees, when applying the meaning of full-time employee provided in <a href="#">26 CFR 54.4980H-1(a)</a> and <a href="#">54.4980H-3</a>. In general, “full-time employee” means, with respect to a calendar month, an employee who is employed an average of at least 30 hours of service per week with an employer.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. More than 20 full-time employees of the entity are employed in the “United States,” as that term is defined in <a href="#">31 CFR 1010.100(hhh)</a>.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>3. The entity has an operating presence at a physical office within the United States. “Operating presence at a physical office within the United States” means that an entity regularly conducts its business at a physical location in the United States that the entity owns or leases and that is physically distinct from the place of business of any other unaffiliated entity.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>4. The entity entity filed a Federal income tax or information return in the United States for the previous year demonstrating more than \$5,000,000 in gross receipts or sales. If the entity is part of an affiliated group of corporations within the meaning of <a href="#">26 U.S.C. 1504</a>, refer to the consolidated return for such group.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>5. The entity reported this greater-than-\$5,000,000 amount as gross receipts or sales (net of returns and allowances) on the entity’s <a href="#">IRS Form 1120</a>, consolidated <a href="#">IRS Form 1120</a>, <a href="#">IRS Form 1120-S</a>, <a href="#">IRS Form 1065</a>, or other applicable IRS form.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>6. When gross receipts or sales from sources outside the United States, as determined under Federal income tax principle, are excluded from the entity’s amount of gross receipts or sales, the amount remains greater than \$5,000,000.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

## Inactive entity

An entity qualifies for this exemption if all six of the following criteria apply:

1. The entity was in existence on or before January 1, 2020.	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. The entity is not engaged in active business.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The entity is not owned by a foreign person, whether directly or indirectly, wholly or partially. “Foreign person” means a person who is not a United States person. A United States person is defined in section 7701(a)(30) of the <a href="#">Internal Revenue Code of 1986</a> as a citizen or resident of the United States, domestic partnership and corporation, and other estates and trusts.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. The entity has not experienced any change in ownership in the preceding twelve-month period.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. The entity has not sent or received any funds in an amount greater than \$1,000, either directly or through any financial account in which the entity or any affiliate of the entity had an interest, in the preceding twelve-month period.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. The entity does not otherwise hold any kind or type of assets, whether in the United States or abroad, including any ownership interest in any corporation, limited liability company, or other similar entity.	<input type="checkbox"/> Yes <input type="checkbox"/> No

## Determination of Beneficial Owners

Substantial control question:	Answer	If response is “Yes”:
1. Does your company have a president, chief financial officer, general counsel, chief executive officer, or chief operating officer?	<input type="checkbox"/> Yes <input type="checkbox"/> No	There are <b>senior officers</b> in your company.
2. Does your company have any other officers that perform functions similar to those of a President, chief financial officer, general counsel, chief executive officer, or chief operating officer?  <i>Note:</i> One individual may perform one or more functions for a company, or a company may not have an individual who performs any of these functions.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3. Does your company have a board of directors or similar body AND does any individual have the ability to appoint or remove a majority of that board or body?	<input type="checkbox"/> Yes <input type="checkbox"/> No	There are individuals with <b>appointment or removal authority</b> over your company.
4. Does any individual have the ability to appoint or remove a senior officer of your company?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Does any individual direct, determine, or have substantial influence over important decisions made by your company, including decisions regarding your company’s business, finances, or structure?  <i>Note:</i> Certain employees who might fit this description are nevertheless exempt from the beneficial owner definition.	<input type="checkbox"/> Yes <input type="checkbox"/> No	There are <b>important decision-makers</b> over your company.
6. Are there any other individuals who have substantial control over your company in ways other than those identified in 1-5 above?	<input type="checkbox"/> Yes <input type="checkbox"/> No	There are individuals to whom the <b>catch-all</b> would apply.

**Complete Step 1:** Once you have reviewed the examples and questions for exercising substantial control above, you will have enough information to complete Step 1 (identify the individuals who meet the substantial control criteria for your company). The individuals you have identified will be reported as beneficial owners in your company’s BOI report unless they qualify for an exception

Ownership interest question:	Answer	If response is “Yes”:
1. Does your company issue equity, stock, or any similar instruments that confer voting power?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Your company has ownership interests that are <b>equity, stock, or voting rights</b> .
2. Does your company issue any pre-organization certificates or subscriptions?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3. Does your company issue any transferable shares of, or voting trust certificates or certificates of deposit for: <ul style="list-style-type: none"> <li>• an equity security,</li> <li>• interest in a joint venture, or</li> <li>• certificate of interest in a business trust?</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4. Do individuals hold capital or profit interests in your company (sometimes referred to as “units”)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Your company has ownership interests that are <b>capital or profit interests</b> .
5. Does your company issue any instruments convertible into any share, equity, stock, voting rights, or capital or profit interest?  <i>Note:</i> It does not matter whether anything must be paid to exercise the conversion.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Your company has ownership interests that are <b>convertible instruments</b> .
6. Does your company issue any future on any convertible instrument?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
7. Does your company issue any warrant or right to purchase, sell, or subscribe to a share or interest in equity, stock, or voting rights, or capital or profit interests?  <i>Note:</i> It does not matter if such warrant or right is a debt.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
8. Does your company issue any non-binding put, call, straddle, or other option or privilege of buying or selling equity, stock, or voting rights, capital or profit interest, or convertible instruments?  <i>Note:</i> Options or privileges created by others without the knowledge or involvement of your company do not apply.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Your company has ownership interests that are <b>options or privileges</b> .
9. Does your company have any other instrument, contract, arrangement, understanding, relationship, or mechanism to establish ownership?	<input type="checkbox"/> Yes <input type="checkbox"/> No	The <b>catch-all</b> ownership interest applies to your company.