# PROOF-T

## Single transaction

Free to use, copy and modify for your own purposes, but a modified certification in Part 6 is not a PROOF form.

Use this form where the matter is assessed once, as at its date: a closing, a purchase, a one-off transfer or payment. For a relationship that carries on, use **PROOF-O**. Attach **PROOF-E** for every party that is an entity or a trust.

Parts 1 to 5 are the same whatever the matter is. Where the matter is real estate, complete **Annex A** as well.

## Part 1. The matter

| | |
|---|---|
| Kind of matter | ☐ Real estate transfer ☐ Fund subscription or investor onboarding ☐ Corporate counterparty ☐ Vendor or supplier ☐ Lending or credit facility ☐ Other: _____ |
| Counterparty, full legal name | |
| Our matter reference | |
| Effective date | |
| Value of the matter | |
| Amount received as currency, cashier's cheques, money orders or similar (USD) | |
| Counterparty is | ☐ Individual ☐ Entity ☐ Trust ☐ Estate |
| Our role | ☐ Settlement or title agent ☐ Escrow ☐ Fund manager or administrator ☐ Lender or credit ☐ Broker or intermediary ☐ Law firm ☐ Compliance or operations ☐ Other: _____ |

**Effective date** means the date this matter is assessed as at: the closing, the subscription, or the date the counterparty is taken on. Everything in Parts 4 and 5 is assessed against it.

## Part 2. The parties

List every party to the matter. Attach PROOF-E for each entity or trust.

| FULL LEGAL NAME | INDIVIDUAL / ENTITY / TRUST | JURISDICTION | DATE OF BIRTH OR FORMATION | ID OR REGISTRATION NUMBER | LEI, IF ANY |
|---|---|---|---|---|---|
| | | | | | |
| | | | | | |
| | | | | | |

## Part 3. Origin of funds

| | |
|---|---|
| Source of the funds used | ☐ Employment ☐ Business ownership ☐ Sale of a business ☐ Sale of assets ☐ Investment returns ☐ Inheritance or gift ☐ Loan or credit facility ☐ Operating revenue ☐ Capital call from investors ☐ Other: _____ |
| Description, one or two sentences | |
| Remitting institution and country | |
| Third party payer? | ☐ No ☐ Yes, relationship: ________________ |
| Supporting document attached | ☐ Bank statement ☐ Sale agreement ☐ Capital call notice ☐ Loan agreement ☐ Accounts ☐ Other: _____ |
| Is any party a regulated institution? | ☐ No ☐ Yes, name and registration: ________________ |

## Part 4. Screening

Every party in Part 2 and every beneficial owner in PROOF-E must appear here. Screening must be run within 30 days before the effective date and never after it.

| PARTY SCREENED | PROVIDER | DATE RUN | LISTS CHECKED | RESULT |
|---|---|---|---|---|
| | | | ☐ OFAC ☐ Consolidated non-US ☐ PEP ☐ Adverse media | ☐ No match ☐ Match, see below |

For every match, whether or not it was cleared:

| PARTY | LIST AND MATCHED NAME | CLEARED OR ESCALATED | DECIDED BY | DATE | REASON FOR THE CONCLUSION |
|---|---|---|---|---|---|
| | | | | | |

A match cleared without a written reason is not a cleared match.

## Part 5. Reports considered

Record every one, including those you concluded were not required. A blank line and "not required" are not the same thing.

| REPORT | CONCLUSION | REASON |
|---|---|---|
| IRS Form 8300, cash over $10,000 | ☐ Filed ☐ Not required ☐ Pending | |
| Any report your own regime requires | ☐ Filed ☐ Not required ☐ None applicable | |

*Form 8300 reaches any trade or business receiving more than $10,000 in currency or equivalent. It is not a real estate rule and it is not limited by asset class.*

Where the matter is real estate, complete Annex A, which adds the reports that are specific to it.

## Annex A. Real estate

Complete this annex only where Part 1 records a real estate transfer. Leave it out entirely otherwise.

| | |
|---|---|
| Property address | |
| County and state | |
| Land record or parcel reference | |
| Residential or commercial | ☐ Residential ☐ Commercial |
| Asset type, if commercial | ☐ Office ☐ Retail ☐ Industrial ☐ Multifamily ☐ Hospitality ☐ Land ☐ Mixed use ☐ Other: _____ |
| Financed? | ☐ No ☐ Yes, lender: ________________ |
| Transferor is | ☐ Individual ☐ Entity ☐ Trust ☐ Estate |

### Reports specific to real estate

| REPORT | CONCLUSION | REASON |
|---|---|---|
| FinCEN geographic targeting order report | ☐ Filed ☐ Not required ☐ Not in a covered area | |
| FinCEN residential real estate report | ☐ Filed ☐ Not required ☐ Suspended by court order | |
| Any state level disclosure | ☐ Filed ☐ Not required ☐ None applicable | |

*As at August 2026 the nationwide residential real estate reporting rule is vacated and on appeal, so no filing is required while that order stands. Geographic targeting orders remain in force in certain metropolitan areas. No federal AML programme or reporting rule has ever applied to commercial real estate in the United States; FinCEN issued advance notices in 2003 and 2021 and finalised nothing. Do not represent a completed form as satisfying a federal AML requirement where there is none to satisfy. Confirm the position in force on your effective date.*

## Part 6. Certification

**This Part is fixed. A PROOF form with an altered Part 6 is not a PROOF form.**

**6.1 Certified without qualification.** These are facts within the Certifying Party's own knowledge and control. The Certifying Party certifies that:

(a) the screening recorded in Part 4 was performed by the provider named, on the dates stated, against the lists marked;

(b) each match was reviewed and dispositioned by the person named, and the reason recorded is that person's actual reason;

(c) each report in Part 5 was considered, and where a report is recorded as not required, the reason stated is the actual reason;

(d) each document referenced is a genuine and unaltered copy of a document held by the Certifying Party;

(e) nothing has been omitted from this form that would make anything stated in it misleading.

**6.2 Certified after Reasonable Inquiry.** These depend on facts held by others. The Certifying Party certifies, to its knowledge after Reasonable Inquiry, that:

(f) every natural person who owns or controls 25 percent or more of any entity or trust party, directly or indirectly, and every person who controls such a party by other means, is identified in the attached PROOF-E;

(g) no person identified holds their interest as nominee for, or under any undisclosed arrangement with, a person not identified;

(h) the origin of the funds is as described in Part 3.

**Reasonable Inquiry** means: obtaining and reviewing the constitutional and ownership records of each entity and trust in the chain; asking the directors, managers or trustees of each in writing to identify its beneficial owners and to confirm the absence of any nominee or undisclosed arrangement; and resolving any inconsistency between those answers and the records before signing. It does not require inquiry beyond what those steps disclose.

**6.3 Authority.** The individual signing certifies that they hold authority to give this certification for the Certifying Party, and that they are not aware of anything making 6.1 or 6.2 untrue. The Certifying Party is bound by this certification. The individual assumes no personal liability beyond this paragraph.

**6.4 Reliance.** This form may be relied upon by the recipient named on delivery, its affiliates, and its administrators, custodians, lenders, title underwriters, insurers, auditors and regulators. It may not be relied upon by any other person.

Reliance runs until the earliest of: the closing date recorded in Part 1, or for an ongoing relationship the next review date recorded in Part 5; twelve months from signature; and notice under 6.5. After that a recipient must request a current form.

Reliance on this form does not discharge any obligation the recipient owes in its own right. **Sanctions liability in particular is strict and cannot be transferred by certificate.** A recipient that deals with a blocked person is liable whether or not this form said otherwise.

**6.5 Update.** If anything certified becomes untrue before reliance expires, the Certifying Party will notify each recipient in writing without delay. For an ongoing relationship, the Certifying Party will provide an updated form at each review recorded in Part 5.

**6.6 What this is not.** This form is not a warranty that any party is free of involvement in unlawful conduct. It is not legal advice. It is not a determination that any report is or is not required as a matter of law. Each recipient makes its own risk decision on its own responsibility.

**6.7 Consequences.** A knowing misstatement may be a criminal offence, including under 18 U.S.C. 1001 where the statement is made to or for the United States, and may constitute fraud. If any statement is materially false when made, a recipient may terminate or decline to complete the matter to which this form relates and recover its reasonable costs of re-performing the diligence. No other remedy is created by this form.

| | |
|---|---|
| Signature | |
| Name | |
| Role | |
| Certifying Party | |
| Date | |
| Delivered to | |

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*PROOF is a free public form. It is not legal advice and does not replace a regulated professional's judgement. The recipient makes its own risk decision. The certification in Part 6 is fixed; see `CERTIFICATION.md` for the drafting notes.*

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