

ALEI: The Authoritative Legal Entity Identifier

In the rush to improve oversight and transparency in the wake of the 2008 Credit Crisis, central banks, treasuries and regulatory authorities created the Legal Entity Identifier (the “LEI”).

The LEI was an intuitive reaction to the lack of basic identity resolution and counterparty risk management in some of the complex structured securities that were at the heart of the scandal.

In response to the challenge, central banks and treasuries worked with bankers and vendors to form the Global Legal Entity Identifier Foundation (GLEIF). The GLEIF was tasked to create and issue proxy LEI identifiers for issuers of securities, and, eventually, for counterparties involved in regulated securities trading. The GLEIF created a secondary business registration program for companies already registered in local and regional jurisdictions.

Background

GLEIF’s LEI repurposes popular identification codes, including Tax ID’s and Business License numbers, as proxies for the more-difficult to find company registration identifiers. Its agents validate each identity using these proxies and, upon payment, generate a 20-digit, alpha-numeric code based on ISO 17442 and publish the open list of registrants to interested parties in order to simplify adoption.

Examples: LEI Registrants in the United States

<i>Apple Computer Inc.</i>	HWUPKR0MPOU8FGXBT394
<i>Amazon Services International, Inc.</i>	549300U87EPT31R7IG45
<i>Amazon.Com Services, Inc.</i>	549300KIK0XCORRK5393

Because it was difficult to source registration information for many companies, the GLEIF created a parallel business registration program that embraced the legacy solution of entity-resolution-by-proxy. Over a period of decades, the industry adopted the proxy identifier protocol because of the technical complexities involved in communicating with thousands of jurisdictions that held the actual, authoritative business registration information. Limited connectivity between registrars, registrants, businesses and officials prevented use of the authoritative identifiers for legitimate purposes.

The internet and contemporary networks have eliminated these technical impediments. The GLEIF and its associated programs have cost industry hundreds of millions of dollars and created a parallel business registration system based on an arbitrary identifier that is not usable outside of securities issuance and trading.

Companies that do not issue or actively trade securities in Europe do not need the LEI. As a result, most companies will not choose to register an LEI. In many cases, actual registrants are not even legal entities, but front or shell organizations formed to accommodate the arbitrary oversight requirements.

Missing an opportunity, LEI proponents overlooked existing entity resolution standards created by the International Standards Organization (ISO). ISO 8000 establishes the universal “quality identifier” which describes the ALEI, a simple, eloquent and free authoritative ID that is created during the original, formative business registration process.

The GLEIF website states that, “we believe that ultimately there should be one identity behind every business,” suggesting it is unaware of local and regional business registration programs, or that it intends to replace them. It may be of concern that GLEIF has not evaluated or partnered with various registration authorities around the world that record legal form and tax information about companies to conduct business and pay taxes in the respective jurisdictions, but as long as regulators mandate the use of the LEI, it will continue.

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The ALEI

Every company, corporation, agency, association, non-profit and partnership in the developed and developing world has a natural, Authoritative Legal Entity Identifier – an ALEI.

The ALEI is unique. It's easy to find. It doesn't cost anything to use. It is valid as soon as a legal entity has been formed or born until the time the entity ceases to exist, and even then, is usable to identify prior activity.

Any company, or person, with a corporate registration or a birth certificate, and access to the Internet, can find its ALEI. The ALEI is a short string of alphanumeric characters that precisely and uniquely identify every legal entity on the globe.

Businesses and organizations that need to precisely and uniquely identify counterparts, or to identify themselves to counterparts, can use the ALEI free of charge. The world's most valuable and innovative companies, like Apple and Amazon, can be precisely identified with a short string of alpha-numeric characters available to anyone on the internet.

<i>Type</i>	Legal Entity	ALEI
<i>Business Entity</i>	Apple Computer, Inc.	US-CA.BER:C0806592
<i>Business Entity</i>	Amazon Services International, Inc.	US-DE.BER:3673342
<i>Business Entity</i>	Amazon.Com Services, Inc.	US-DE.BER:3482342
<i>Vital Records</i>	President Donald Trump	US-NY.QNYC.DH-BRS:7624
<i>Vital Records</i>	President Barack Obama	US-HI.DH:151.61-10641
<i>Vital Records</i>	Elvis Aaron Presley	US-MS.BH:19351836

The origin and birthrights of celebrities, business and political leaders, can be precisely established by the ALEI with a simple birth certificate. This code can be used throughout their lives to complete banking and credit approval processes and can serve as a legal identifier for official registrations, and after death, to organize tax and legal information.

Many companies and users have already adopted ALEI for supply chain and network management and can access the ALEI Directory at <http://eALEI.org>. Companies that have adopted the PNS and ALEI framework can also register their Prefixes, or identify registered Prefixes, using the Prefix Name Service Registry, or PNS, at <https://quiplab.com>.

Coincidentally, most important and famous people can be identified using birth certificates or their ALEI, to satisfy curiosity or questions about heritage. In the future, your average Jane could use the ALEI to complete typical banking or credit approval processes that normally begin with a birth certificate.

The Solution

The alternative – the ISO 8000 compliant, fully-funded ALEI solution, built and managed over decades by national, state and local agencies – has been overlooked by industry and regulatory authorities because it is so simple. Small “mom and pop” companies and larger, privately-held companies that do not need financing from capital markets, can use the ALEI.

Earlier in the decade, the ISO 8000 standard that was initiated in 2002 had begun to organize the framework for the first Master Data Identifiers. These ISO 8000 elements were approved in 2009, and the final components are being published now.

Today, most organizations still do not realize that they already have an ISO-standard natural legal entity identifier, and that they do not need to buy it or register it. It exists as a result of their formation, as a “natural identifier” that is more authoritative and rational than any other “proxy.”

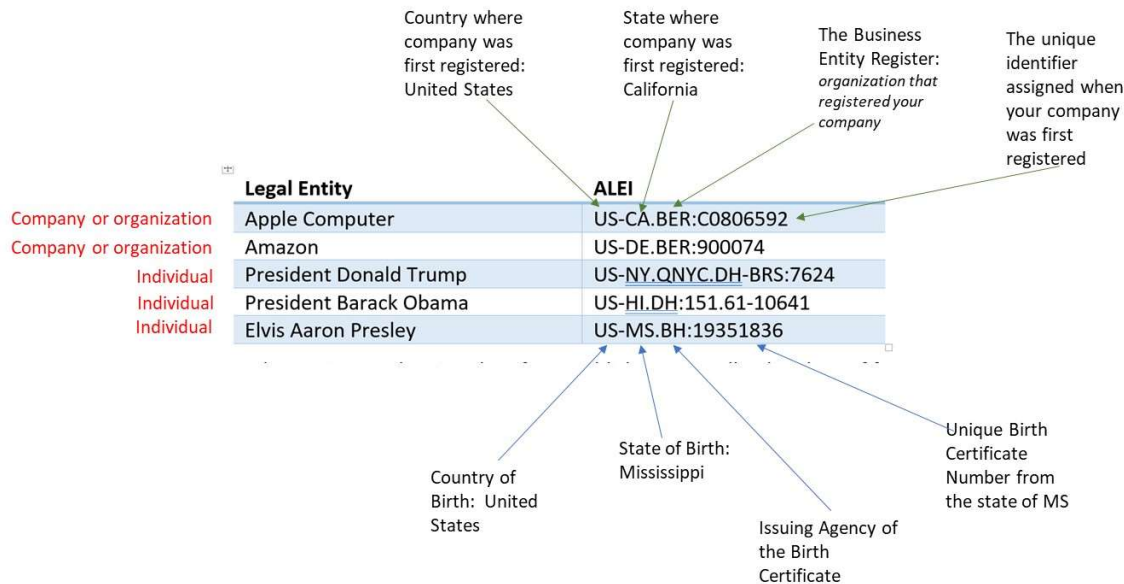
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Several large, high tech companies have determined that ALEI is a mechanism that will help them manage thousands of companies in their supply chains that fall outside of the scope of the GLEIF regime.

In addition, the Electronic Commerce Code Management Association, or ECCMA, has established a repository for company ALEI's at <http://eALEI.org/>. In addition, ECCMA has developed a registry of ALEI prefixes, so that users and supply chain managers can identify the “issuer” of the ALEI.

Structure

The ALEI is simply the identifier code that results from the combination of the registration place and the registration number. Organizations simply combine the ISO code for their place of incorporation with the registration number assigned at birth or incorporation.



ISO 3166 gives us the first part – the registration place. The ISO 3166 standard defines codes for the names of countries, territories and their subdivisions. This list is published and is free to use. Each of those places is managed by a political or governmental organization that provides registration authorities that issue business licenses and birth certificates.

National, state and local agencies around the world give us the second part – the registration identifier. In the USA, the state of Delaware operates a Department of State, which operates a Division of Corporations that registers Business Entities and has registered more than 1,000,000 business entities – including more than 2/3 of the Fortune 500.

Key Concepts

- What is Authoritative Legal Entity Identifier, or ALEI?

An ALEI is a string of alpha-numeric characters that uniquely represent an entity by describing the place of formation, for an organization, or place of birth, for an individual, followed by the unique identifier that was assigned to that organization or person at inception.

- Why do organizations and people need or want an ALEI?

The ALEI is a simple, unique ID that identifies the organization or person that was formed or born on a certain date in a certain place. It is not a repurposed, proxy identifier, such as a Tax ID or License

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number, and it has no other purpose than to identify the entity. As it is adopted by more governments and merchants, its purpose cannot be confused.

- Is an ALEI better than an LEI, Tax ID or License Number for legal, regulatory or business purposes?

The ALEI is gradually being recognized as a pure identifier. Legal, regulatory and business users have begun to use the ID because its only purpose is entity identification, and it doesn't introduce any new risks to transactions for either counterpart or party. All other identifiers are proxies.

- Does the ALEI expose an organization or person to the risk of identity theft or loss of privacy?

ALEI does not expose any organization or person to new risks, but personally identifiable information (PII) can be misused and coopted for nefarious means by people with ill-intentions. Individuals should protect their PII at all times and be careful with whom they share. The ALEI does not pose the same risks as other identifiers, such as social security numbers or driver's license numbers, because it has no other purpose and is not a key to other systems.

- Which countries or organizations issue the ALEI?

Every developed country and most developing countries operate business entity registration and vital records agencies that issue identifiers for new people and new companies.

- How much does an ALEI cost?

The ALEI is free to use. The only costs are those related to the original company registration or search for vital records.

- How does the ALEI help companies operate more efficiently and simplify transaction processing?

The ISO 8000 Natural Legal Entity Identifier establishes, naturally, the place of formation in the case of an organization, or birth, in the case of a person, and the unique registration, certificate or record identifier.

Summary

For decades, most organizations, including government agencies, banks and major corporations, have relied upon proxy materials to satisfy credit risk management requirements for most of their customers and counterparts.

Risk management groups demanded clear forms of entity identification. For years, the only reasonable sources that were consistently available and from credible sources were national Tax ID's.

It was too difficult and complex to research and find the original, authoritative entity identifiers. Bankers and risk managers were faced with the implementation of expensive, manual processes to establish the true identities of their counterparts, or the use of "proxy" identifiers from credible sources that were good enough to satisfy legal and regulatory overseers.

ISO 8000 simply recognizes that this identifier exists, describes a structure to represent it, and explains why it is viable for organizations and even for people.

ALEI Examples

<i>Name</i>	Barack Hussein Obama
<i>ALEI</i>	US-HI.DH:151.61-10641
<i>ISO 3166-2 Country</i>	US
<i>ISO 3166-2 State</i>	HI

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Issuing Authority	DH – Department of Health
Registration City	Honolulu
Registered File ID	151
Birth Certificate ID	61-10641

STATE OF HAWAII
CERTIFICATE OF LIVE BIRTH
 DEPARTMENT OF HEALTH
 FILE NUMBER **151**
61 10641

1a. Child's First Name (Type or print) **BARACK** 1b. Middle Name **HUSSEIN** 1c. Last Name **OBAMA, II**

2. Sex **Male** 3. This Birth ☒ Single ☐ Twin ☐ Triplet ☐ 4. If Twin or Triplet, Was Child Born 1st ☐ 2nd ☐ 3rd ☐ 5a. Birth Date **August 4 1961** 5b. Hour **7:24 P.M.**

6a. Place of Birth: City, Town or Rural Location **Honolulu** 6b. Island **Oahu**

7a. Name of Hospital or Institution (If not in hospital or institution, give street address) **Kapiolani Maternity & Gynecological Hospital** 7b. In Place of Birth Inside City or Town Limits? ☒ Yes ☐ No 7c. County and State or Foreign Country **Honolulu, Hawaii**

7d. Usual Residence of Mother: City, Town or Rural Location **Honolulu** 7e. Island **Oahu** 7f. In Residence Inside City or Town Limits? ☒ Yes ☐ No

7g. Street Address **6085 Kalanianaʻole Highway** 7h. Is Residence on a Farm or Plantation? ☐ Yes ☒ No

8. Full Name of Father **BARACK HUSSEIN OBAMA** 9. Race of Father **African**

10. Age of Father **25** 11. Birthplace (State, Town or Foreign Country) **Kenya, East Africa** 12a. Usual Occupation **Student** 12b. Kind of Business or Industry **University**

13. Full Maiden Name of Mother **STANLEY ANN DUNHAM** 14. Race of Mother **Caucasian**

15. Age of Mother **18** 16. Birthplace (State, Town or Foreign Country) **Wichita, Kansas** 17a. Type of Occupation Outside Home During Pregnancy **None** 17b. Date Last Worked **None**

I certify that the above stated information is true and correct to the best of my knowledge.

18a. Signature of Parent or Other Informant **Barack Obama** 18b. Date of Signature **8-7-61**

19a. Signature of Attendant **Alvin T. Omaka** 19b. Date of Signature **8-8-61**

20. Date Accepted by Local Reg. **AUG - 8 1961** 21. Signature of Local Registrar **Alvin T. Omaka** 22. Date Accepted by Reg. General **AUG - 8 1961**

23. Evidence for Delayed Filing or Alteration

APR 25 2011

I CERTIFY THIS IS A TRUE COPY OR
 ABSTRACT OF THE RECORD ON FILE IN
 THE HAWAII STATE DEPARTMENT OF HEALTH
Alvin T. Omaka, Ph.D.
 STATE REGISTRAR

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Name	Donald John Trump
QUID	US-NY.QNYC.DH-BRS:7624
ISO 3166-2 Country	US
ISO 3166-2 State	NY
Issuing Authority	DH-BRS – Department of Health, Bureau of Records & Statistics
Registration City	QNYC – Borough of Queens, City of New York
Birth Certificate ID	7624

Certificate of Birth				Certificate No. 7624	
1. Full name of child (PRINT) DONALD JOHN TRUMP					
2. Sex MALE		3. Color or Race WHITE		4. Date of child's birth (Month) (Day) (Year) (Hour) (A.M.) June 14 1946 10:54 A.M.	
5. Number of children born of this pregnancy 1					
6. USUAL RESIDENCE OF MOTHER: (a) State New York (b) County Queens (c) City Jamaica					
7. PLACE OF BIRTH (a) NEW YORK CITY: (b) Borough Queens (c) Name of Hospital Jamaica Hospital (d) Length of mother's stay at place of birth immediately prior to birth of child 10 hrs.					
8. USUAL RESIDENCE OF MOTHER: (a) State New York (b) County Queens (c) City Jamaica (d) No. 85-15 (e) Length of residence or stay in New York City immediately prior to birth of child 15 yrs.					
9. Full name of FATHER Fred C. Trump					
10. Full maiden name of MOTHER Mary MacLeod					
11. Color or race White		12. Age at time of this birth 40 years		13. Color or race White	
14. Birthplace (city or place and State, or country) NYC		15. Age at time of this birth 33 (years)		16. Birthplace (city or place and State, or country) Scotland	
17. Occupation (a) Trade, profession, or particular kind of work done, as spinner, sewer, bookkeeper, etc. Builder (b) Industry or business in which work was done, as silk mill, garment, bank, etc. Own business					
18. Occupation (a) Trade, profession, or particular kind of work done, as housekeeper, typist, nurse, clerk, etc. Housewife (b) Industry or business in which work was done, as own home, lawyers office, silk mill, etc. Own home					
19. Total number of children BORN ALIVE PREVIOUS to this pregnancy 3					
20. Number of children born PREVIOUS to this pregnancy and NOW LIVING 3					
I hereby certify that this child was born alive at the hour and on the date stated above, and that all the facts stated in this certificate and report of birth are true to the best of my knowledge, information and belief.					
Given name added from supplemental report: (Date of) (Signature) Robert L. Schuchman M.D. F.R.C.P. (Address) 37-22 Sutphin Blvd. (Date of Report) June 14, 1946					
BUREAU OF RECORDS AND STATISTICS		DEPARTMENT OF HEALTH		CITY OF NEW YORK	
Jamaica					

Above is an exact copy of a certificate of birth registered, on the date indicated, in the Bureau of Records and Statistics of the Department of Health in the borough in which the birth occurred. It is sent, without charge, pursuant to the provisions of Section 567-3.0 of the Administrative Code of the City of New York.

If the certificate contains any errors, return this copy with the correct information to the Assistant Registrar of Records in the borough where the child was born. (See address below.) He will advise you how to proceed to have the record corrected. It is important to do this at once.

William O'Dwyer MAYOR **W. R. Pidgeon** ACT'G REGISTRAR OF RECORDS **Israel Weinstein** M.D. COMMISSIONER OF HEALTH

MANHATTAN: 125 North Street BROOKLYN: 295 Flatbush Avenue Extension
THE BRONX: 1826 Arthur Avenue QUEENS: 148-15 Archer Avenue, Jamaica
RICHMOND: 51 Stuyvesant Place, St. George, S.I.

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VR 115 300M (3/98) P.O. NO. M816190 DOCUMENT NO. H 387321


THE CITY OF NEW YORK
DEPARTMENT OF HEALTH
VITAL RECORDS
CERTIFICATION OF BIRTH

This is a certification of name and birth facts on file in the Bureau of Vital Records, Department of Health, City of New York.

DATE OF BIRTH	JUNE 14, 1946	CERTIFICATE NO.	07624
BOROUGH	QUEENS	DATE FILED	06-17-46
		DATE ISSUED	04-28-99
NAME	DONALD JOHN TRUMP ***		
SEX	MALE		
MOTHER'S MAIDEN NAME	MARY MAC LEOD		
FATHER'S NAME	FRED C. TRUMP		

Steven P. Schwartz
STEVEN P. SCHWARTZ
CITY REGISTRAR

Do not accept this transcript unless it bears the raised seal of the Department of Health. The reproduction or alteration of this certification is prohibited by Section 3.21 of the New York City Health Code.



Transaction ID
V03-0018703-1

VitalChek Credit Card Receipt
VCN New York
Credit Card Authorization Code: 801036

Date/Time Requested
4/27/1999 @ 4:07 pm

Certificate Type: BIRTH
Name on Certificate: DONALD TRUMP

Date of Birth: 6/14/1946 Sex: M
Place of Birth - Hospital:
Borough: Q
Father's Name: FRED TRUMP
Mother's Maiden Name: MARY MACLEOD

Copies: 1
Carrier: Federal Express
Daytime Telephone: (212)832-2000
Relation: SELF
Request Fee this Item: \$ 15.00
Other State Fees this Item: \$ 0.00
State Other
VitalChek Fee Carrier Fee Request Fee State Fees Total Fee
\$ 5.00 \$ 10.50 \$ 15.00 \$ 0.00 \$ 30.50

Ship To: DONALD TRUMP
TRUMP TOWERS
725 5TH AVE - 26TH FL
NEW YORK, NY 10022 (212)832-2000

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Name	Elvis Aaron Presley
QUID	US-MS.BH:1935-1836
ISO 3166-2 Country	US
ISO 3166-2 State	MS
Issuing Authority	BH – Board of Health
Registration District ID	10
Birth Certificate ID	1935-1836

DEC 28 1953

BUREAU OF VITAL STATISTICS STANDARD CERTIFICATE OF BIRTH

MISSISSIPPI STATE BOARD OF HEALTH

1. PLACE OF BIRTH
County Lee Dist. No. 569 Reg. No. 10
Voting Precinct East Tupelo or Village
or City (Hospital)

2. Full name of child Elvis Aaron Presley

3. Sex Male If plural births no 4. Twin or triplet no 5. Premature no 6. Legitimate yes 7. Date of birth January 8, 1935
(Month, day, year)

8. Full name V. E. Presley 9. Maiden name Glades Smith
10. Full P. O. Address Tupelo, Miss. 11. Full P. O. Address Tupelo, Miss.

12. Color White 13. Age at last birthday 18 (Years) 14. Color White 15. Age at last birthday 21 (Years)

16. Birthplace (city or county) Itawamba County, Mississippi 17. Birthplace (city or county) Itawamba County, Mississippi
(State or country) (State or country)

18. Trade, profession, or particular kind of work done, as spinner, sawyer, bookkeeper, etc. Laborer 19. Trade, profession, or particular kind of work done, as housekeeper, typist, nurse, clerk, etc. Housewife

20. Industry or business in which work was done, as silk mill, sawmill, bank, etc. Welfare 21. Industry or business in which work was done, as own home, lawyer's office, silk mill, etc. Own home

22. Date (month and year) last engaged in this work January 1935 23. Total time (years) spent in this work one year 24. Date (month and year) last engaged in this work January 1935 25. Total time (years) spent in this work one year

26. Number of children of this mother (at time of this birth and including this child) 2 (a) Born alive and now living 1 (b) Born alive but now dead 0 (c) Stillborn 1

27. If stillborn, * no 28. Cause of stillbirth no 29. Before labor no 30. During labor no

*See other side.

CERTIFICATE OF ATTENDING PHYSICIAN OR MIDWIFE

I hereby certify that I attended the birth of this child who was born alive at 4:35 a.m. on the date above stated.

When there was no attending physician or midwife, then the father, householder, etc., should make this return.

(Signed) W. R. Hunt, M. D.
or W. F. Riley, Midwife
Filed Jan 10, 1935 Registrar. Address Tupelo, Miss.

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Amazon

Amazon ALEI: US-BE.BER:2053010

<u>File Number:</u>	2053010	<u>Incorporation Date</u> /1/17/1985 <u>Formation Date:</u> (mm/dd/yyyy)
<u>Entity Name:</u>	AMAZON (USA) INC.	
<u>Entity Kind:</u>	Corporation	<u>Entity Type:</u> General
<u>Residency:</u>	Domestic	State:DELAWARE

REGISTERED AGENT INFORMATION

Name:	UNITED STATES CORPORATION COMPANY	
Address:	251 LITTLE FALLS DRIVE	
City:	WILMINGTON	County:New Castle
State:	DE	Postal Code:19808
Phone:	302-636-5400	

Google LLC

Google ALEI: US-DE.BER:3582691

<u>File Number:</u>	3582691	<u>Incorporation Date</u> /10/22/2002 <u>Formation Date:</u> (mm/dd/yyyy)
<u>Entity Name:</u>	GOOGLE LLC	
<u>Entity Kind:</u>	Limited Liability Company	<u>Entity Type:</u> General
<u>Residency:</u>	Domestic	State:DELAWARE

4edREGISTERED AGENT INFORMATION

Name:	CORPORATION SERVICE COMPANY	
Address:	251 LITTLE FALLS DRIVE	
City:	WILMINGTON	County:New Castle
State:	DE	Postal Code:19808
Phone:	302-636-5401	

References

https://en.wikipedia.org/wiki/ISO_3166

https://en.wikipedia.org/wiki/ISO_8000

<https://icis.corp.delaware.gov/Ecorp/EntitySearch/NameSearch.aspx>