Date Filed: August 14, 2026

Witness: Jared A. Lawrence, Jessica B. Cain, Timothy W. McGrath and Daniel M. Traynor
Request from: Office of Education, Outreach, and Enforcement

Question:

(ACCOUNT ESTABLISHMENT-PROCESS CHANGES) Identify and describe any changes made since 2018 to the Company's identity verification processes, systems, or internal controls in response to known fraud incidents, including the rationale for such changes and any evaluation of their effectiveness.

Response:

There have been no changes to the Company's identity verification processes, systems, or internal controls in response to known fraud incidents since 2018.