

Anti-Money Laundering Notice

Following the attacks on September 11, 2001, the U.S. government enacted the USA PATRIOT Act, which is designed to prevent the use of the U.S. financial system to help fund terrorism and other crimes. The Act imposes a series of new anti-money-laundering requirements on registered broker-dealers. Money laundering is the process of disguising illegally obtained money so that the funds appear to come from legitimate sources or activities. Money laundering occurs in connection with a wide variety of crimes, including terrorism, illegal arms sales, drug trafficking and public official corruption.

Our Program

Under the USA PATRIOT Act and other regulations, broker-dealers must establish a compliance program, which includes policies and procedures to detect and report suspicious activities to the government, as well as ensure compliance with the new laws. Firms must also implement specialized employee training programs, designate a special compliance officer and conduct independent audits of the effectiveness of the compliance program.

The regulations also impose new requirements regarding client information and verification of that information. We are required to verify the identity of the clients with whom we do business and obtain information about the source of a client's wealth. As part of our compliance with the new Act and in support of the fight against money laundering around the world, we will ask clients for information and documentation, which may be used to verify client identity. Until you provide the information or documents we need and until we have verified your identity, we may not be able to provide services to you.

The USA PATRIOT Act requires us to maintain records of, and to update, your identity verification and financial information. We recognize the importance of safeguarding your nonpublic personal information. We are committed to maintaining the confidentiality of the information you provide in accordance with our Privacy Policy.

This policy notice is required by [FINRA](#).