

The USA PATRIOT Act

The USA PATRIOT Act is designed to detect, deter, and punish terrorists in the United States and abroad. The Act imposes anti-money laundering requirements on brokerage firms and financial institutions.

What is money laundering?

To help you understand these efforts, we want to provide you with some information about money laundering and our steps to implement the USA PATRIOT Act. 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 illegal arms sales, drug trafficking, theft, fraud, racketeering, and terrorism.***

How big is the problem and why is it important?

The use of the U.S. financial system by criminals to facilitate terrorism or other crimes could well taint our financial markets. According to the U.S. State Department, one recent estimate puts the amount of worldwide money laundering activity at \$1 trillion a year.

What are we required to do to eliminate money laundering?

Under the USA PATRIOT Act, and other regulations applicable to us, We have designated one or more chief anti-money laundering compliance officers for its financial business units and established policies and procedures to detect and report suspicious transactions and ensure compliance with the laws. We have also established appropriate policies and procedures to detect and report suspicious transactions and otherwise comply with applicable laws, set up and conduct employee training, and have independent audits conducted to test the effectiveness of our policies and procedures. As part of our required programs, policies and procedures, we may ask you to provide various identification documents or other information. Until you provide the information or documents we need, we may not be able to open an account, effect any transactions for you, or provide other products or services to you.

We thank you for your patience and hope that you will support us in our efforts to deny terrorist groups access to America's financial system, as well as our efforts to detect and try to eliminate the use of our systems and services for money laundering relating to other crimes, and for other illegal uses such as fraud and market manipulation.

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