

IMPORTANT INFORMATION ABOUT OPENING A NEW ACCOUNT

Anti-Money Laundering Procedures / USA PATRIOT Act

LCM is committed to abiding by the U.S. government's regulatory and statutory requirements regarding Anti-Money Laundering protections. The USA PATRIOT Act was enacted to strengthen the United States government's ability to combat terrorist financing and money laundering. An essential component of the USA PATRIOT Act requires financial institutions to obtain, verify, and record information that identifies each person or entity with a relationship at a financial institution. LCM, prior to inception of a relationship and periodically during the tenure of the relationship, will ask for your firm's legal name, street address, authorized traders, certified articles of incorporation, partnership or trust agreement and other information or documents that we consider necessary to verify your identity. These rules also may require you to provide additional information, such as your net worth, investment experience and objective.

Customer Identification Program

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account, we will ask for various identifying information including name, tax identification number, office address, etc. that will allow us to identify you and your firm. We may ask to see identifying documents. We thank you in advance for your cooperation to these measures.

Business Continuity Plan

Pursuant to SEC and FINRA Rule 4370, LCM maintains and updates a Business Continuity Plan in the event of a significant business disruption. The firm has developed a business continuity plan to protect our clients and employees in the event of an emergency or significant business disruption. The plan is designed to help prepare for securing the firm property, making financial and operational assessments, promptly recovering and resuming operations and allowing our clients access to trading as soon as possible. The business continuity plan considers various scenarios that range in severity from a firm- or building-only disruption to an emergency situation on a local or regional level. LCM, has established an alternative location, in the event our office locations are inaccessible.

LCM has a summary of the Business Continuity Plan posted on its website www.louiscapital.com.

Correspondent Accounts

Pursuant to USA PATRIOT ACT Section 311, correspondent accounts maintained by a covered financial institution are prohibited to indirectly provide banking services to certain named foreign banks. The U.S. Department of Treasury and the Financial Crimes Enforcement Network (FinCEN) maintain a listing of such prohibited foreign banks. LCM periodically monitors this listing to ensure it is acting in accordance therewith.

Disclosure of Order Routing Information

Pursuant to SEC Rule 606, customers may request information on order routing. Specifically, customers may review disclosures of the venues to which their orders were routed for execution at <http://www.tagaudit.com/do/display?page=Public::R606>

Investor Education and Protection

As a client of LCM, we are making you aware of the availability of information through FINRA's Broker Check program. Please be advised that FINRA offers an investor brochure describing the Public Broker Check program. The investor brochure may be obtained via the FINRA website at <http://www.finra.org/Investor/ToolsCalculators/BrokerCheck/index.htm> or through the FINRA Broker Check program Hotline Number at (800) 289-9999.

Securities Investor Protection Corporation (SIPC)

Pursuant to FINRA Rule 2266, LCM is a member of the Securities Investor Protection Corporation (SIPC). Customers can obtain information regarding SIPC, including the brochure "How SIPC Protects You" through the SIPC website located at www.sipc.org.

Privacy Policy Disclosure

LCM recognizes and appreciates the importance of respecting the privacy of our customers and is committed to safeguarding the unauthorized disclosure of, or access to, personally identifiable information from or about its customers. LCM will collect certain information for the primary purpose of delivering the highest level of service to you. We use your information to execute and process your brokerage transactions, to provide you with information required by application rules and regulations.

LCM has prepared this Privacy Policy Disclosure to describe the strict standards of security and confidentiality that it has established for the collection, processing, and use of your information. Please read this disclosure to understand how your information will be treated.

LCM employees and registered persons are required to protect the confidentiality of customer information. All customer information is treated in a confidential manner; and therefore, LCM has established physical, electronic and procedural safeguards to protect customer information.

In conducting our business, information about our customers will not be disclosed to anyone, except where disclosure of information is required by law. This includes information disclosed for audit purposes or to law enforcement or regulatory agencies.

LCM will make available information for review by a customer upon written request. Information collected in connection with any claim or legal proceeding will not be made available. LCM will review any information which a customer states is incorrect, and if applicable, the customer records will be revised. If LCM does not agree, a customer may submit a statement of dispute, which will be included in any future information disclosure.

Further Information: The Gramm-Leach-Bliley Act established privacy standards and requires LCM to provide this summary of our privacy policy. For additional information regarding our privacy policy, please contact us in writing at 853 Broadway, Floor 5, New York, New York 10003.