



PO Box 2760 ■ Omaha, NE 68103-2760

BSA/AML and OFAC Certification

This certification is designed for financial institutions requesting documentation of TD Ameritrade's ("TD Ameritrade" or the "Firm") compliance with the Bank Secrecy Act ("BSA")/Anti-Money Laundering ("AML") and Office of Foreign Assets Control ("OFAC") laws and regulations. It applies to TD Ameritrade Holding Corporation and applicable subsidiaries: TD Ameritrade, Inc.; TD Ameritrade Clearing, Inc.; TD Ameritrade Investment Management, LLC; TradeWise Advisors, LLC; TD Ameritrade Trust Company; TD Ameritrade Futures & Forex LLC (Futures Dealer Member).

- TD Ameritrade is a registered broker-dealer with the Securities and Exchange Commission and is a member of the Financial Industry Regulatory Authority ("FINRA").
- TD Ameritrade is regulated by a "federal functional regulator" as that term is defined under 31 C.F.R. 1010.100(r).
- TD Ameritrade is required to implement an anti-money laundering program ("AML Program") as provided in 31 U.S.C. 5318(h), and has implemented an AML Program that is designed to be compliant with relevant United States anti-money laundering laws and regulations including the USA PATRIOT Act. TD Ameritrade's AML Program includes written policies and procedures, a designated Anti-Money Laundering Compliance Officer, ongoing anti-money laundering training for appropriate employees, suspicious transaction monitoring and reporting, approval by senior management, and an independent audit to test the implementation of the Program.
- TD Ameritrade has a written Customer Identification Program ("CIP") consistent with Section 326 of the USA PATRIOT Act and the rules promulgated thereunder; and it performs the requirements set forth in its written CIP.
- TD Ameritrade has adopted procedures reasonably designed to comply with the laws, regulations, and Executive Orders administered by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"), including the List of Specially Designated Nationals and Blocked Persons administered by OFAC, as such list may be amended from time to time.
- TD Ameritrade retains relevant documentation with respect to its customers, including the identification information, obtained in accordance with the above procedures for five years after the date on which customer accounts are opened.

BSA/AML and OFAC risks are taken seriously at TD Ameritrade and the Firm is committed to minimizing risks posed by non-compliance in all applicable areas.

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