

Annual Written Supervisory Procedures Certification

_____ (Initial) **Written Supervisory Procedures Attestation**

My initials above and signature below will certify that I have read, understand and agree to comply with the entire Written Supervisory Procedures manual of The Firm. I have either been provided a hard copy or I have ready access to an electronic copy of the Written Supervisory Procedures. Furthermore, I attest that I have had ample opportunity to discuss any questions that I may have regarding these procedures with my direct supervisor and the Chief Compliance Officer.

_____ (Initial) **Electronic Communication Written Supervisory Procedures**

My initials above and signature below will certify that I have read and understand and agree to comply with the firm's Written Supervisory Procedures regarding email and other forms of electronic communication including but not limited to email, instant messaging, and text messaging. I understand that I may be terminated for cause if I use an unauthorized email or instant message account to correspond with current customers, solicit new customers or to discuss securities or business related matters with other employees of The Firm. I understand that if I ever receive communication from a current customer or a potential customer through an unauthorized account that I am required to forward a copy of the communication to my authorized email account along with an email to customer informing him or her that all future correspondence must be directed to an approved and authorized account.

_____ (Initial) **Money Laundering Procedures**

My initials above and signature below will certify that I have read, understand and agree to comply with the Money Laundering Written Supervisory Procedures of The Firm. I understand that I may be terminated for cause and prosecuted if I am found to violate the Money Laundering Written Supervisory Procedures of The Firm. I know 1) who the Money Laundering Compliance Officer of The Firm is, 2) understand the definition of money laundering, and 3) understand the "Red Flags" outlined in the Written Supervisory Procedures. Additionally, I understand that it is my responsibility to report any situation where I believe that another employee, customer or any other affiliated person or entity is engaged in money laundering or any other criminal activity to my direct supervisor, the Chief Compliance Officer, or a member of senior management immediately upon discover or suspicion.

_____ (Initial) **Insider Trading Procedures**

My initials above and signature below will certify that I have read, understand and agree to comply with the Insider Trading Written Supervisory Procedures of The Firm. I understand that I may be terminated for cause and prosecuted if I am found to violate the Insider Trading Written Supervisory Procedures of The Firm. I understand the definition of Inside Information and trading, I understand that I may not act on inside information nor may I forward Inside Information to anyone else. Additionally, I understand that it is my responsibility to report any situation where I believe that either another employee, customer or any other affiliated person or entity is misusing Inside Information to either my direct supervisor, the Chief Compliance Officer, or a member of senior management immediately upon discover or suspicion.

_____ (Initial) **Social Media Procedures**

My initials above and signature below will certify that I have read, understand and agree to comply with the Social Media Supervisory Procedures of The Firm. I understand that I may be terminated for cause and prosecuted if I am found to violate the Social Media Procedures of The Firm.

Print Name

Signature

_____/_____/_____
Date