



## SILBER BENNETT FINANCIAL

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### Anti Money Laundering Disclosure

It is the policy of the firm to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have derived from legitimate origins or constitute legitimate assets.

### Customer Identification and Verification

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 and maintains an account. This means that we will collect the following information for all accounts, if applicable, for any person, entity or organization who is opening a new account (or is being granted trading authority over a new or existing account) and whose name is on the account or has authority over the account:

- the name and mailing and residential (or principal place of business) street address of the customer;
- the customer's date of birth;
- for U.S. persons, the customer's Social Security number or taxpayer identification number; and

Recognizing that different types of accounts pose different risks and trigger different requirements under the rules, we will gather the additional information specified below for each of the following categories of accounts we provide:

1. **Individual Accounts** – We will make reasonable efforts to obtain the customer's net worth, annual income, occupation and employment data, such as the employer's address, and the customer's investment experience and objectives.
2. **Domestic Operating or Commercial Entities** – We will collect information sufficient to determine the corporate or business entity's identity, and the authority of its business representative to act on its behalf.
3. **Domestic Trusts** – We will identify the trustee, the activity the trust authorizes, and the authority of the trust's representative to act on its behalf.
4. **Institutional Accounts, Hedge Funds, Investment Funds and Other Intermediary Relationships** – While our AML procedures cover institutional clients, we recognize that certain types of institutional accounts are different from retail accounts. Institutional accounts often are opened for financially sophisticated customers who trade frequently, in volume, and usually through an intermediary, some of whose AML policies and procedures are sufficient and verifiable. In addition, in determining whether it is necessary to identify the investors of non-U.S. institutions, we will consider the regulation of the institution by its home country and whether the institution is located in a bank secrecy haven or a non-cooperative country.

### Customers Who Refuse To Provide Information

If a potential or existing customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, our firm will not open a new account and, after considering the risks involved, consider closing any existing account.

### Verifying Information

To the extent reasonable and practicable, we will ensure that we have a reasonable belief that we know the true identity of our customers. In verifying customer identity, we will analyze any logical inconsistencies in the information we obtain.

Appropriate documents for verifying the identity of natural persons include the following:

- An unexpired driver's license, passport, or other government identification showing nationality, residence.
- Beginning in September 2011, all new accounts will be submitted to an OFAC, SSN and birth date review. This service is in addition to our request for a driver's license or other form of identification.

The following documents are appropriate for verifying the identity of businesses:

- A certificate of incorporation, a government-issued business license, any partnership agreements, any corporate resolutions, or similar documents.

Should you have any questions regarding our Anti-Money Laundering program, please feel free to contact Jamie S. Bennett, Chief Compliance Officer at (818) 986-9079.