



SW FINANCIAL

USA Patriot Act

The purpose of the USA PATRIOT Act is to deter and punish terrorist acts in the United States and around the world, to enhance law enforcement investigatory tools, and other purposes, some of which include:

- * To strengthen U.S. measures to prevent, detect and prosecute international money laundering and financing of terrorism;
- * To subject to special scrutiny foreign jurisdictions, foreign financial institutions, and classes of international transactions or types of accounts that are susceptible to criminal abuse;
- * To require all appropriate elements of the financial services industry to report potential money laundering;
- * To strengthen measures to prevent use of the U.S. financial system for personal gain by corrupt foreign officials and facilitate repatriation of stolen assets to the citizens of countries to whom such assets belong.

In compliance with the Act, SW Financial has instituted policies & procedures in its anti money laundering compliance program. The program includes the following:

1. The designation of an AML Compliance Officer .
2. Reporting any suspicious activity and/or transactions to the United States Government.
3. Continuing Education requirements in anti money laundering practices and procedures for SW Financial personnel.
4. Annual independent audits identifying the effectiveness of the 'AML' program.

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