



Anti Money Laundering (AML) Program Disclosure Statement

This disclosure document is designed to provide you with information regarding our Policies and Procedures relating to AML & the USA Patriot Act.

Alamo Capital, a Member Firm of FINRA & SIPC, is a full-service brokerage firm providing Retail and Institutional customers with execution services on all major exchanges and access to all major markets. These functions are provided primarily in Walnut Creek, California with various broker and trading systems.

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. Generally, money laundering occurs in three stages. Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments, such as money orders or traveler's checks, or deposited into accounts at financial institutions. At the "layering" stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin. At the "integration" stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses. Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal the origin or intended use of the funds, which will later be used for criminal purposes.

Summary of AML Program items of importance and responsibility of Alamo Capital:

- To follow all Regulatory Rules and Guidance, including FINRA, SEC, FINCEN
- The Firm will continually monitor for new rules relating to Section 311 of the US Patriot Act and will take appropriate action when new rules are passed under this provision
- To obtain and verify customers identification and information
- To make risk-based assessments as to whether any account poses increased or significant risk re AML, based on our firms' size, its customer base and its resources
- To monitor accounts for any suspicious activity and 'Red Flags'
- To always have a designated AML Officer
- To never accept cash in any denomination
- To never accept money orders
- To conduct regular training for all Employees on areas of importance to be aware of
- To conduct annual AML Testing

Updates to This Disclosure

As we continue to test our program and as conditions in our firm and the industry change, we will revise the program as considered necessary. Whenever we update this disclosure document, we will promptly place a copy of it on our website.

Clients may reach Alamo Capital at (925) 472-5700.