

May 24, 2019

To Whom It May Concern;

J. M. Lummis Securities, Inc. (JMLS) is firmly committed to participating in the efforts to combat money laundering and the funding of terrorist activities.

For this purpose, JMLS has established an Anti-Money Laundering Compliance Program (AML Program), that incorporates a Customer Identification Program (CIP) designed to comply with the USA PATRIOT Act of 2001 and all other applicable U.S. laws and regulations relating to the prevention of money laundering and terrorist financing (including, without limitation, the Executive Order on Terrorist Financing issued by President George W. Bush on September 23, 2001). The AML Program complies with the May 11, 2018 CDD Rule requirements. Among its other features, the AML Program includes written policies and procedures, designated compliance officers, AML training for appropriate personnel, and an independent audit of the AML Program.

JMLS is also subject to the regulations administered by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC) and has policies and procedures designed to comply with the prohibitions and restrictions as mandated by OFAC.

If you have any questions or require additional information regarding our anti-money laundering efforts, please contact me at (203) 966-0005.

Thank you,



Susan Galione, CCO

J. M. Lummis Securities, Inc.