

**FREEMAN CAPITAL ADVISORS LLC**  
**ANTI-MONEY LAUNDERING POLICIES AND PROCEDURES**

**Anti-Money Laundering**

Freeman Capital does not to provide services to persons or entities that have connections to organized crime, violent crime, drug trafficking, arms trafficking, foreign official corruption or terrorism. The firm prohibits the use of any of its facilities (including its offices, computer systems, or assets) by its officers, owners, employees or affiliated persons for any illicit or illegal activities.

**Procedures**

Verification of Client Identity

Freeman Capital requires documentary evidence of each individual client's name, current address and phone number and date of birth. Documentary evidence may include a legible photocopy of a valid drivers' license, a valid passport or other unexpired government-issued identification. For identity documentation issued by a foreign government, additional documentary verification of current address and other contact information is required.

I. Client Identity Also Verified by Client Custodian

Since Freeman Capital does not custody client assets, all of its clients are required to establish custodial accounts with an independent broker-dealer. Broker-dealers are required by federal law and regulation to adopt extensive anti-money laundering policies and procedures. As a part of their anti-money laundering programs, broker-dealers must verify the identity of each customer of the brokerage firm, determine whether each customer has been identified by the U. S. Department of Treasury (or other government entity) to be involved in terrorism, drug trafficking or organized crime and to monitor customer accounts for suspicious activity.

Suspicious Activity Reporting

The Chief Compliance Officer will file a suspicious activity report (FinCen Form 101: SAR-SF) under the following circumstances:

1. If the name of each prospective client screened through the U. S. Office of Foreign Asset Control ("OFAC") appears on the List of Specially Designated Nationals and Blocked Persons. The List is made available through the U.S. Department of the Treasury on its web site <http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default>.

2. If Freeman Capital, in connection with its advisory services, identifies any activity on the part of a client with persons or entities that appear on any government list of restricted persons, and upon further investigation into the matter, it is determined that suspicious activity may have occurred.
3. If Freeman Capital detects, or reasonably suspects, a federal criminal violation or attempted violation by one of its clients, officers or employees or any other suspect using the firm's services or facilities.
4. Freeman Capital detects or suspects that its computer systems have been accessed by persons or entities to remove, steal, procure or otherwise affect its client or own accounts or other critical information or to damage or disable its computer systems and databases.

Suspicious activity report (SAR) forms and instructions for filing are available on the FINRA web site <http://www.finra.org/Industry/Issues/AML/>. SARs must be filed within 30 days of the detection of the suspicious activity. Records of reports filed must be kept for a minimum of five years.

Freeman Capital will maintain a hard copy file of each suspicious activity report for five years from the date the report is filed.

#### CTR - Currency Transaction Reporting

Since Freeman Capital custodies no client assets and accepts no client funds or securities, it is unlikely that it will be required to report client currency transactions under applicable currency transaction reporting regulations. Nevertheless, if a currency transaction of \$10,000 or more (deposit, withdrawal, exchange of currency or other payment or transfer through the firm), is mistakenly accepted, the Chief Compliance Officer will immediately notify and return the currency to its source. If warranted, the Chief Compliance Officer may file a Currency Transaction Report (CTR). Records of reports filed must be kept for a minimum of five years.

Currency Transaction report forms and instructions for filing are available on the FINRA web site <http://www.finra.org/Industry/Issues/AML/>. CTRs must be filed within 15 days of the transaction.

#### CMIR – Currency or Monetary Instrument Transport Reporting

Freeman Capital does not accept currency. If an employee discovers that currency of \$10,000 or more has been received from a source outside the U.S., the Chief Compliance Officer must be notified immediately and will file a CMIR with the Commissioner of Customs.

In cases where Freeman Capital transports, mails, ships or receives or causes or attempts to transport, mail, ship or receive monetary instruments of more than \$10,000 in or out of the U.S.,

at one time (on one calendar day or for the purpose of evading the reporting requirements, on one or more days), the Chief Compliance Officer will be notified immediately and will file a CMIR, as required.

CMIR forms and instructions for filing are available on the FINRA web site <http://www.finra.org/Industry/Issues/AML/>. Records of reports filed must be kept for a minimum of five years.