



PO Box 2760 ■ Omaha, NE 68103-2760

## IDENTITY THEFT PREVENTION PROGRAM CERTIFICATION

This certification is designed for financial institutions requesting documentation of TD Ameritrade's ("TD Ameritrade" or the "Firm") compliance with the Firm's Identity Theft Prevention Program ("Program"). The Program is designed to detect, prevent, and mitigate identity theft activity in connection with the opening of new accounts or with existing accounts. The Program is consistent with various laws, rules, and regulations for covered accounts including:

- Sections 114 and 315 of the Fair and Accurate Credit Transactions Act of 2003 ("FACT Act").
- Provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which amended section 615(e) of the FACT Act.
- The Securities and Exchange Commission ("SEC") [17 CFR Part 248, subpart C "Regulation S-ID: Identity Theft Red Flags"] and Commodity Futures Trading Commission ("CFTC") [17 CFR Part 162, subpart C "Identity Theft Red Flags"] implementing regulations.
- Section 326 of the United and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 ("USA PATRIOT Act") requiring verification of the identity of persons opening new accounts through a Customer Identification Program ("CIP") [31 CFR Part 103.122] and section 31 CFR 1010 Customer Due Diligence ("CDD Rule").

TD Ameritrade's Program, which was approved by the Firm's Audit Committee of the Board of Directors, includes the following key components:

- The designation of an ID Theft Program Administrator and the establishment of the Financial Intelligence Unit;
- A Customer Identification Program or "CIP" and Customer Due Diligence Requirements for Financial Institutions ("CDD Rule");
- Procedures for monitoring, detecting, and mitigating indicators of red flags for risks of identity theft at the account opening and during ongoing account activity;
- Authenticating account access and transactions for new and existing accounts;
- Providing associate training concerning the Program and the Firm's procedures to review suspicious activities indicative of identity theft;
- Providing client education and mitigation techniques about identity theft;
- Filing of certain reports with governmental agencies;
- Conducting an annual review of the Program;

TD Ameritrade is an introducing broker that clears its accounts through TD Ameritrade Clearing, Inc. Accounts opened and maintained at TD Ameritrade are subject to identity verification and monitoring throughout the life of the account. TD Ameritrade Clearing, Inc. does not clear for other firms.

Regulatory responsibilities are taken seriously at TD Ameritrade and the Firm is committed to minimizing risks posed by non-compliance in all applicable areas.

ID Theft Program Administrator