

# How Your Money is Protected

First Clearing provides a high level of safety for your investment accounts due to the way we conduct our business, the safeguards of our industry and the regulations to which we must adhere. These safeguards were primarily developed to protect consumers and thus ensure public confidence in the financial system and maintain stability in the financial industry.

## Your Investments are Held Separately from Our Operations

The securities industry in the United States is among the most heavily regulated in the world to help ensure that investment accounts are a safe and accessible place for individuals, families and businesses to place money they wish to invest. The Securities and Exchange Commission (SEC) is the securities industry's primary regulatory body.

A cornerstone of protection of client assets in investment firms is the segregation of assets — that is, client assets are held separately from the assets of the investment firm. This principle is laid out in the SEC's Customer Protection Rule, which states that all fully paid client securities must be held separately from the investment firm's own assets and are not available for firm use. The rule ensures that if an investment firm experiences losses, investor assets are not affected.

The exception to this rule is if the investor has a current loan from a margin account with the firm, which can be established only under a written agreement with the investor. If he or she has a current loan from that margin account, the firm may use some of the assets. Otherwise, the firm must keep investor funds and investments separate from any of the investment firm's assets and may not use them for any purpose. In the rare event that an investment firm fails, investors benefit from several layers of protection.

## Industry Measures Protect Against Insolvency Risks

### SIPC Protection

First Clearing is a member of the Securities Investor Protection Corporation (SIPC), a nonprofit, Congressionally chartered membership corporation created in 1970. SIPC protects clients against the custodial risk of a member investment firm becoming insolvent by replacing missing securities and cash up to \$500,000, including up to \$250,000 in cash, per client in accordance with SIPC rules. (Note that SIPC coverage is not the same as, nor is it a substitute for, FDIC deposit insurance; securities purchased through First Clearing are not FDIC-insured.) For more information about SIPC, please visit [sipc.org](http://sipc.org).

## Serving Your Needs

Putting clients' needs above all else, we provide exceptional service based on trust and knowledge, supported by one of the nation's largest investment firms.

## Additional Insurance Coverage We're Providing to Our Clients

Above and beyond SIPC coverage, First Clearing maintains additional insurance coverage through London Underwriters (led by Lloyd's of London Syndicate — referred to here as "Lloyd's"). For clients who have received the full SIPC payout limit, First Clearing's policy with Lloyd's provides additional coverage above the SIPC limits for any missing securities and cash in client investment accounts up to a firm aggregate limit of \$1 billion (including up to \$1.9 million for cash per client). In other words, the aggregated amount of all client losses covered under this policy is subject to a limit of \$1 billion with each client covered up to \$1.9 million for cash.

## About Lloyd's of London

Since its beginnings in the 17th century, Lloyd's of London has been a world leader in insurance markets, providing its services to businesses in a broad range of sectors. Currently, Standard & Poor's and Fitch Ratings have rated Lloyd's credit as "A+ (Strong) Stable Outlook," and A.M. Best has given Lloyd's a credit rating of "A (Excellent) Stable Outlook." For more information about Lloyd's of London, please visit [lloyds.com](http://lloyds.com).

## The Limits of SIPC and Lloyd's Insurance Coverage

Please note that coverage provided by SIPC and Lloyd's does not protect against the loss of market value of securities. All coverage is subject to the specific policy terms and conditions.

## FDIC Insurance Limits

Current FDIC insurance covers a depositor for \$250,000, but through our convenient, automated service you get even more protection.

At First Clearing, cash deposits are covered by FDIC insurance for a total of at least \$750,000 if you are enrolled in our Bank Deposit Sweep Program.\* Through this program, uninvested cash balances (principal and interest) are automatically deposited, or "swept," into three affiliate banks. Depositors are covered for up to \$250,000 per owner at the first affiliate bank plus \$250,000 per account in each of the two additional affiliate banks – triple the coverage you would receive at one bank.

*\* Our current Bank Deposit Sweep Program places no more than \$250,000 at each of the second and third affiliate banks for a total of \$750,000 for individual accounts (higher for joint and trust/transfer-on-death (TOD) accounts depending on the number of owners/beneficiaries).*

For example:

**Individual accounts (i.e., one owner)** — Cash sweep deposits are insured up to \$750,000.

**Joint accounts (i.e., multiple owners)** — Cash sweep deposits are insured for up to \$1.5 million in the case of two owners — plus an additional \$250,000 for each additional owner.

**Trust/transfer-on-death (TOD) accounts** — Cash sweep deposits are insured for up to \$750,000 in the case of one owner/one beneficiary — with additional insurance coverage for each additional owner/beneficiary combination (e.g., with two owners and two beneficiaries, the total is \$1.5 million).

**Traditional and Roth IRAs\*** — Cash sweep deposits are insured for \$250,000 at each of three affiliate banks for a total of \$750,000.

These deposit insurance limits refer to the total coverage that an account holder has at each affiliate bank, including any CDs. The listing above shows only the most common ownership categories that apply to individual/family deposits and assumes that all FDIC requirements are met. More information on FDIC coverage is available at [fdic.gov](http://fdic.gov).

For further information regarding the Bank Deposit Sweep Program, refer to the Cash Sweep Program Disclosure Statement. A copy can be obtained from your financial professional.

*\* For other self-retirement accounts, such as money purchase, 401(k) and defined-contribution profit-sharing plans, the total coverage is also \$750,000.*

**Investment and Insurance Products:**

▶ NOT FDIC Insured ▶ NO Bank Guarantee ▶ MAY Lose Value

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