

## **Client Notice:**

Hartfield, Titus & Donnelly, LLC (“HTD”) is required by various self-regulatory organization rules to provide our clients, on annual basis, with information regarding education and protection. HTD is registered with the U.S. Securities and Exchange Commission, The Municipal Securities Rulemaking Board and Financial Industry Regulatory Authority.

### **General Information**

All Fixed Income Transactions are subject to the rules, regulations, customs, rulings and interpretations of the Municipal Securities Rulemaking Board, the Securities and Exchange Commission and the Financial Industry Regulatory Authority.

All transactions are executed on a Delivery versus Payment (DVP) or Receipt versus Payment (RVP) basis. HTD promptly transmits and delivers all transacted funds and securities through its fully disclosed clearing agent, Hilltop Securities, Inc. HTD does not maintain any cash or margin accounts for clients and therefore holds no funds or securities for its clients.

Please note the following information:

Information about SIPC can be found at <http://www.sipc.org> or obtained from SIPC by telephone at (203) 371-8300. For your convenience, a link to SIPC is provided at HTDonline.com.

HTD is required under FINRA Rule 2267 to provide our clients with the following information:

- ) The FINRA BrokerCheck Hotline telephone number is 800-289-9999
- ) The FINRA web site address is [www.finra.org](http://www.finra.org). For your convenience, a link to the FINRA website is provided at MuniBrokers.com
- ) For a copy of an investor brochure that includes information describing FINRA BrokerCheck, please call the Hotline phone number provided above or visit the FINRA web site at [www.finra.org](http://www.finra.org).

MSRB Rule G-10 requires HTD to provide you with the MSRB’s website address which is [www.msrb.org](http://www.msrb.org). There is a link provided to user from Munibrokers.com.

The MSRB’s website is where you will find education material (the investors brochure) These materials will describe the protections that are provided to you under MSRB rules and also how if the need arises to file a complaint with an appropriate regulatory authority.

## **Business Continuity Plan Disclosure Statement**

In the event of a Significant Business Disruption, HTD will be able to fulfill our clearance and settlements obligations for transactions. This will be accomplished at our clearing agent, Hilltop Securities, Inc.

Depending upon the severity of the disruption, HTD has made provisions for the continuation of our brokering business. These provisions include the use of alternate locations, our other office locations throughout the U.S., and other back-up facilities for our critical business systems.

For further information on our BCP, please contact Edward Smith (201) 217-5587.

### **Arbitration Agreement – Between Your Firm and HTD**

Any controversy between you and HTD shall be submitted to arbitration before the Financial Industry Regulatory Authority (FINRA), as per the arbitration provisions that you agreed to when your relationship with HTD was established, which provide in part:

“No Person shall bring a putative or certified class action to arbitration nor seek to enforce any pre-dispute arbitration agreement against any person who has initiated in court a putative class action who is a member or a putative class who has not opted out of the class with respect to any claims encompassed by the putative class action until: (I) the class certification is denied; (II) the class is decertified; or (III) then customer is excluded from the class by the court. Such forbearance to enforce an agreement to arbitrate shall not constitute a waiver of any rights under this agreement to arbitrate shall not constitute a waiver of any rights under this agreement except to the extent stated herein.”

### **Arbitration Facts**

- ) Arbitration is final and binding on the parties;
- ) The Parties to arbitration are waiving their right to seek remedies in court, including the right to jury trial;
- ) Pre-arbitration discovery is generally more limited than and different from court proceedings;
- ) The Arbitration Panel will typically include a minority of arbitrators who were or are affiliated with the securities industry; and
- ) The arbitrators' award is not required to include factual findings or legal reasoning and any Party's right to appeal or to seek modifications of rulings by the arbitrators is strictly limited.

### **Order Flow**

HTD does not direct order flow to select market makers, exchanges specialist or any other entity and receives no compensation for any such arrangement.

### **Suitability**

Upon first becoming a client of HTD, you had affirmed or it was ascertained that you as a client of HTD, will be exercising independent judgment in evaluating any transactions and are capable of evaluating investment risks and market value independently in regards to your transactions. If at any time this statement becomes inaccurate, you must promptly notify HTD.

**Anti-Money Laundering**

Please be advised that information provided to HTD by our clients will be used to verify the client's identity as required by FINRA RULE 3310 and the USA Patriot Act Anti-Money Laundering Program.

**Change in Client Information**

If at any time the information provided by you to HTD becomes inaccurate, it is the responsibility of you to notify HTD promptly of any changes.

We thank you for choosing HTD for your institutional brokering needs. If you should have any questions or concerns, please call your broker or the Compliance Department at (201) 217-5587.