

## DISCLOSURE NOTICE

Version: May 2023

R. Seelaus & Co., LLC (“RSCO”) is a U.S. registered Securities and Exchange Commission (“SEC”) broker-dealer, member of the Financial Industry Regulatory Authority (“FINRA”). To meet regulatory requirements, we are providing the following disclosures for your information. Should you have any questions regarding this letter, please do not hesitate to contact your relationship manager. No action is required of you with regard to the production of this disclosure notice. Thank you for the opportunity to serve your financial needs.

### DISCLOSURE OF FINANCIAL INFORMATION TO CUSTOMERS FINRA Rule 2261

Pursuant to “*FINRA Rule 2261: Disclosure of Financial Condition to Customers*” issued by the Financial Industry Regulatory Authority (“FINRA”), R. Seelaus & Co., LLC will make available to customers on request information contained in our most recent balance sheet. If interested, please contact our Chief Financial Officer at the following contact details:

R. Seelaus & Co., LLC  
Attention: Chief Financial Officer  
26 Main Street, Suite 300, Chatham, NJ 07928  
Telephone #: 1-908-273-3011 ext 3043  
Email: [mmolchan@rseelaus.com](mailto:mmolchan@rseelaus.com)

### INVESTOR EDUCATION & PROTECTION FINRA Rule 2267

Pursuant to “*FINRA Rule 2267: Investor Education and Protection*”, R. Seelaus & Co., LLC would like to remind customers that they may obtain information regarding FINRA BrokerCheck and FINRA itself at the following contact details:

FINRA Website: <https://www.finra.org>  
FINRA BrokerCheck: <https://brokercheck.finra.org/>  
FINRA BrokerCheck online informational website:  
<https://www.finra.org/investors/learn-to-invest/choosing-investment-professional/about-brokercheck>

For further questions regarding FINRA BrokerCheck, please do not hesitate to call the BrokerCheck telephone hotline number at (800) 289-9999.

### SIPC DISCLOSURE NOTICE FINRA Rule 2266

Pursuant to “*FINRA Rule 2266: SIPC Information to Customers*”, R. Seelaus & Co., LLC would like to remind customers that they may obtain information about the Securities Investor Protection Corporation (“SIPC”), including the SIPC brochure, by contacting SIPC at the following contact information:

SIPC Website: <https://www.sipc.org/>

SIPC Brochures: <https://www.sipc.org/news-and-media/brochures>

SIPC Mailing Address:

Securities Investor Protection Corporation (SIPC)  
1667 K St. N.W., Suite 1000, Washington, D.C. 20006-1620  
Telephone: (202) 371-8300  
Fax: (202) 223-1679  
Email: [asksipc@sipc.org](mailto:asksipc@sipc.org)

### CUSTOMER COMPLAINT DISCLOSURE Securities Exchange Act Rule 17a-3(a)(18)

In the event a customer would like to register a complaint regarding R. Seelaus & Co., LLC, please contact us at the following address:

R. Seelaus & Co., LLC  
Attention: Chief Compliance Officer  
26 Main Street, Suite 300, Chatham, NJ 07928  
Telephone #: 1-908-273-3011 ext 3004  
Email: [compliancersc@rseelaus.com](mailto:compliancersc@rseelaus.com)

### SEC RULE 606 / NOTICE DISCLOSURE OF ORDER ROUTING INFORMATION (EQUITY SECURITIES)

SEC Rule 606 requires broker dealers to publicly disclose their order routing practices for non-directed client orders, as well as the material aspects of the relationships with the entities to whom the orders are routed. R. Seelaus & Co., LLC clears all of its equity and options trades through Pershing, LLC. In accordance with the requirements of Rule 606, please refer to the following link for the publication of our Rule 606 report detailing our order routing information: <https://www.rseelaus.com/legal/> A copy of the respective quarterly firm reports may also be requested from your relationship manager. In addition, pursuant to SEC Rule 606(b), individual client order routing information is also available to clients upon request.

### SEC RULE 607 / NOTICE DISCLOSURE REGARDING PAYMENT FOR ORDER FLOW (EQUITY SECURITIES)

Securities and Exchange Commission Rule 607 requires all registered broker-dealers to provide disclosures to customers regarding payment for order flow practices. R. Seelaus & Co., LLC routes equity orders to exchanges, electronic communication networks, or to other broker-dealers during normal business hours and during extended trading sessions. Some of those market centers may provide payments or charge access fees to R. Seelaus & Co., LLC depending upon the characteristics of the order and any subsequent executions. Information regarding these payments can be found by viewing R. Seelaus & Co., LLC's SEC Rule 606 Quarterly Routing Disclosure reports either via our clearing firm BNY Pershing, through SS&C Technologies, or through our Firm website. In addition, a paper copy may also be provided on request, along with any other details of these payments and fees. R. Seelaus & Co., LLC may receive compensation from routing exchange-listed options routed to broker-dealer intermediaries, which may utilize smart order routing technology or customized algorithms to achieve the best execution available under the particular circumstances of the specific transaction requested.

### BUSINESS CONTINUITY PLAN DISCLOSURE ("BCP") (FINRA Rule 4370)

Pursuant to FINRA Rule 4370, R. Seelaus & Co., LLC has created and maintains a written BCP with procedures that are reasonably designed to enable firms to meet their obligations to customers, counterparties and other broker-dealers during an emergency or significant business disruption. R. Seelaus & Co., LLC, if necessary, will update this BCP in light of changes to firms' operations, structure, business or location periodically. In addition, as a U.S. Securities and Exchange Commission registered broker dealer, member FINRA and SIPC, we will coordinate our BCP with the BCP of our clearing firms BNY Pershing and Industrial and Commercial Bank of China. In the event of a business disruption, our goal is not only to safeguard our employees and property but to take the necessary steps to resume operations as quickly as possible depending upon the nature, scope, and severity of the business interruption.

In the event a client is unable to reach their relationship manager, please do not hesitate to contact the following firm contacts:

R. Seelaus & Co., LLC  
Attention: Mayya Molchan, Chief Financial Officer  
26 Main Street, Suite 300, Chatham, NJ 07928  
Telephone #: 1-908-273-3011 ext 3043  
Email: [mmolchan@rseelaus.com](mailto:mmolchan@rseelaus.com)

R. Seelaus & Co., LLC  
Attention: Karolina Pajdak, Chief Compliance Officer  
26 Main Street, Suite 300, Chatham, NJ 07928  
Telephone #: 1-908-273-3011 ext 3004  
Email: [compliancersc@rseelaus.com](mailto:compliancersc@rseelaus.com)

## USA PATRIOT ACT ANTI-MONEY LAUNDERING NOTICE

In accordance with the *United and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruction Terrorism Act* ("USA Patriot Act") and to help the government fight the funding of terrorism and money laundering activities, financial institutions are required by Federal law to obtain, verify, and record information that identifies each individual or entity that opens an account or requests credit.

What this means for individuals: When an individual opens an account or requests credit, we will ask for certain information regarding individuals which may include, but is not limited to, their name, residential address, date of birth, tax identification number, investing history, current place of employment, and any other information that allows us to identify them in a meaningful way. We may also ask to see a driver's license, passport or other identifying documents.

What this means for other legal entities: When a corporation, partnership, trust or other legal entity opens an account or requests credit, we will ask for the entity's name, physical address, tax identification number and other information that will allow us to identify the entity. We may also ask to see other identifying documents, such as certified articles of incorporation, partnership agreements or a trust instrument.

We may use documentary and non-documentary methods to obtain information from independent sources that will allow us to identify you. In the event that we do not receive the sufficient information to know our customer, R. Seelaus & Co., LLC reserves the right to either deny a new account opening or may close an existing account if the information set forth in a client file is no longer current.

## ANNUAL MUNICIPAL SECURITIES RULEMAKING BOARD NOTICE (MSRB Rule G-10)

R. Seelaus and Co., LLC is a broker-dealer registered with the U.S. Securities and Exchange Commission and the Municipal Securities Rulemaking Board ("MSRB").

MSRB's website may be found at: [www.msrb.org](http://www.msrb.org).

Please be advised that informational brochures are available on the MSRB's website entitled "*Information for Municipal Securities Investors*" and/or "*Information for Municipal Advisory Clients*" which describe the protections that may be provided by the MSRB's rules and how to file a complaint with an appropriate regulatory authority.

Should you have any questions regarding this letter, please do not hesitate to contact our Compliance Department at 908-273-3011. This is an informational notice and a reply is not required.

We are forwarding this communication to your attention for your files. If you are not the correct contact person to receive these notices, kindly send an email with the name, email, and telephone number of the individual responsible to receive notices.

## PROHIBITION AGAINST TRADING AHEAD OF CUSTOMER ORDERS (FINRA Rule 5320)

FINRA Rule 5320 generally provides that a broker/dealer that accepts and holds an order in an equity security from its own customer or customer of another broker-dealer is prohibited from trading that security on the same side of the market for its own account at a price that would satisfy the customer order, unless the firm immediately thereafter executes the customer's order up to the size and at the same or better price at which it traded for its own account. Please note that consistent with the existing regulatory guidance, not-held orders which generally give RSC time and price discretion are outside the scope of FINRA Rule 5320.

RSC will only trade equity securities for our retail customer accounts as agent and does not trade securities for its own account. Orders in equity securities for our institutional accounts, or for orders of 10,000 shares or more that are greater than \$100,000 in value, will be received on a not-held basis.

**R. SEELAUS & CO., LLC GROUP PRIVACY POLICY (REVISION 5/12/2023)**

The following describes how R. Seelaus & Co., LLC and its affiliates Seelaus Asset Management LLC, RSC Financial Products LLC, and Seelaus Financial, LLC, ("R. Seelaus & Co., LLC Group") handle your personal information, and what steps we take to protect your privacy. This policy applies to current and former customers. We do not use your personal information for marketing purposes.

**Accessing Information**

Access to customer information is authorized for official business purposes only. It is based on our need to know such information to assist your broker or advisor in providing products and services to you, or to conduct R. Seelaus & Co., LLC Group business. R. Seelaus & Co., LLC Group requires its employees and Pershing LLC (clearing agent) who have access to customer information to protect it and keep it confidential.

**Collect Information to Conduct Business**

R. Seelaus & Co., LLC Group collects information about you to help your broker or advisor serve your financial needs, provide customer service, offer new products or services, and fulfill legal and regulatory requirements. The type of information that your broker provides to R. Seelaus & Co., LLC Group varies according to the products or services you request through your broker or advisor, and includes but is not limited to:

- Information included on your application and related forms (such as name, address, Social Security number, net worth, and income).
- Information about your relationships with your broker or advisor (such as products or services purchased, account balances and payment history); and
- Information from visitors to R. Seelaus & Co., LLC Group's websites (such as that provided through online forms, site visitor-ship data and online information collecting devices known as "cookies.")

**Security Standards**

R. Seelaus & Co., LLC Group continues to assess new technology to evaluate its ability to provide additional protection of your personal information. We safeguard this information in accordance with federal standards and established security standards and procedures. Some of the measures we implement include use of physical, electronic, and procedural safeguards.

**Sharing Information**

In the course of conducting business, we may disclose some or all of the previously described information about you to our clearing agent, Pershing, LLC and other businesses including non-affiliated third parties, as allowed by law, for the purpose of:

- Providing customer service or account maintenance.
- In response to a subpoena, to prevent fraud, or to comply with an inquiry by a government agency or regulator, and
- To perform services for us or on our behalf to develop or maintain software.

If you wish to limit our sharing of information about you as described in this notice, you may do so by contacting us at the below phone number or address.