

## RUBICON CAPITAL ADVISORS

## Disclosures

This notification is for informational purposes and does not require any action on your part.

**FINRA Rule 2266 and NYSE Rule 409A**

RCA is a member of the Securities Investor Protection Corporation ("SIPC"). FINRA Rule 2266 require RCA to disclose SIPC Contact Information. SIPC plays an important role in the overall system of investor protection in the United States by, in certain specified situations, restoring funds to investors with assets in the hands of bankrupt and otherwise financially troubled brokerage firms. When a brokerage firm is closed due to bankruptcy or other financial difficulties and customer assets are missing, SIPC steps in as quickly as possible and, within certain limits, works to return customers' cash, stock, and other securities. You may obtain more information about SIPC, including a brochure entitled How SIPC Protects You, by contacting SIPC at:

Securities Investor Protection Corporation

1667 K Street, N.W. Suite 1000

Washington, D.C. 20006

phone: (202) 371-8300

Email: [asksipc@sipc.org](mailto:asksipc@sipc.org)

You may also visit SIPC's website at [www.sipc.org](http://www.sipc.org).

**FINRA Regulation Public Disclosure Program**

RCA is required by FINRA Rules to provide you with information about the availability of information through FINRA's Public Disclosure Program. The investor brochure may be obtained via the FINRA Web Site [www.finra.org](http://www.finra.org) or through the FINRA Public Disclosure Program Hotline Number at (800) 289-9999.

**FINRA Rule 2261 Disclosure of Financial Condition to Customers**

RCA will make available, upon request, a statement of financial condition as disclosed in its most recent balance sheet prepared either in accordance with the firm's usual practice or as required by any state or federal securities laws, or any rule or regulation thereunder.

**Important Information about New Account Opening Procedures / Customer Identification Program (CIP)**

The Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 ("USA Patriot Act") was enacted to strengthen the United States government's ability to combat terrorist financing and money laundering. An essential component of the USA Patriot Act requires financial institutions to obtain, verify and record information that identifies each person or entity with an account relationship at a financial institution.

If you are an individual and open an account or carry out transactions with RCA, the following information will be collected:

Securities and Investment Banking Services offered through Rubicon Capital Advisors ([rubiconcapitaladvisors.com](http://rubiconcapitaladvisors.com)). The Firm is a member of [FINRA](http://www.finra.org) and [SIPC](http://www.sipc.org) and is registered as a broker / dealer with the SEC ([www.sec.gov](http://www.sec.gov)). All rights reserved.

1. Name
2. Date of birth
3. Address
4. Identification number:
  - U.S. citizen: taxpayer identification number (Social Security number or employer identification number)
  - Non-U.S. citizen: taxpayer identification number; passport number and country of issuance; alien identification card number; or government-issued identification showing nationality, residence and a photograph of you.

You may also need to show your driver's license or other identifying documents.

If you are a corporation, partnership, trust or other entity opening accounts, RCA will ask for (i) name, (ii) street address (either principal place of business, a local office or other physical location), (iii) a U.S. taxpayer identification number, or if not organized or a resident in the United States or filing U.S. income tax returns, the number and country of issuance of any other government-issued document certifying the existence of the organization, and (iv) such other information or documents that we consider necessary to verify the entity's identity. Examples of additional information include articles of incorporation, a government-issued business license, a partnership agreement or a trust instrument. We may also verify the entity's identity through other means.

If the above information is not provided, RCA may not be able to open an account or carry out transactions for you. If RCA has already opened an account for you, they may have to close it.

### **Business Continuity Planning**

RCA has an established Business Continuity Plan ("BCP") that includes systems and procedures for backup and recovery of mission critical systems / data, alternate communications with customers / employees and alternate physical locations.

RCA's BCP is designed to address the effects of various significant business disruptions ("SBDs"), whether internal (e.g., affecting a RCA building) or external (e.g., affecting a business district, city or region in which RCA conducts business), that may be caused by a number of foreseeable scenarios. RCA's BCP includes a crisis management framework as well as a number of contingency sites and plans to address both internal and external SBDs. Secondary phone: (281) 838-5408. All RCA operational facilities are equipped for resumption of business. Regarding all circumstances within our control, RCA's recovery time objective for business resumption is six (6) hours, depending upon the availability of external resources. In the event that your firm experiences a significant business interruption, you may contact RCA directly to process limited trade-related transactions, cash disbursements, and security transfers.

Instructions to RCA must be in writing and transmitted via facsimile to: (281) 465-9616 or by postal service as follows:

Deirdre Patten  
85 North Frontera Circle  
The Woodlands, TX 77382  
281-838-5408

RCA's policy is to respond to all SBDs by focusing on:

- Safeguarding employees' lives, customer assets and Firm property
- Making timely and prudent financial and operational assessments
- Quickly recovering and resuming essential business operations within hours, and if not feasible, the next business day
- Protecting the Firm's books and records
- Allowing RCA customers to transact business

If you would like a copy of the full plan, please contact your RCA representative.

### **Complaints**

Complaints concerning services provided by RCA may be directed to:

Deirdre Patten  
85 North Frontera Circle  
The Woodlands, TX 77382  
281-838-5408

### **Confidentiality**

RCA's policy is to maintain the confidentiality of client order and transaction information. RCA has strict policies and procedures in place to protect on confidentiality of client information, as well as, sophisticated and secure trading and operational technology to provide superior protection of our clients' portfolio holdings and related trading activity.

### **RCA's Privacy Policy**

GRAMM-LEACH BLILEY ACT AND SEC REGULATION S-P and REGULATION SAM require RCA to disclose its privacy policy.

### **Types of Nonpublic Personal Information Collected by RCA**

RCA collects nonpublic personal information that is either provided by you or obtained with your authorization.

### **Parties to Whom We Disclose Information**

For current and former clients, we do not disclose any nonpublic personal information obtained in the course of our business except as required or permitted by law. Permitted disclosures include, for instance, providing information to our employees and, in limited situations, to unrelated third parties who need to know that information to assist us in providing services to you. In all such situations, we stress the confidential nature of information being shared. RCA may also share information with its affiliates.

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### **Protecting the Confidentiality and Security of Current and Former Client's Information**

We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs and in some cases, to comply with professional guidelines. In order to guard your nonpublic personal information, we maintain physical, electronic and procedural safeguards that comply with our professional standards.

Please call if you have any questions, or want to opt out of our information sharing, because your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.

If there is anything that has not been addressed by the above, please contact Deirdre Patten at: (281) 838-5408.