



LEADING INVESTORS SINCE 1924™

ST. GERMAIN & CO. DISCLOSURE DOCUMENT

This letter is provided in compliance with SEC & FINRA rules regarding account opening and annual disclosures that must be made by St. Germain to all clients.

Regulation S-P (Privacy Disclosure)

D.J St. Germain DOES NOT sell any information from clients to third parties, such as direct mail organizations or telephone solicitors. Our standards have always been higher than those common throughout the financial services industry, and will remain so in the future.

D.J St. Germain collects nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms.
- Information about your transactions with us.

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted and/or required by law.

In addition, we restrict access to nonpublic personal information about you to those employees who need to know that information to provide services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

SEC Rule 11Ac1-3 (Payment for Order Flow Disclosure)

D.J St. Germain does not engage in any Payment for Order Flow arrangements. All our orders are routed to brokers where our experience indicates that the client will receive the best execution.

NASD Rule 2280 (Public Disclosure Program)

The National Association of Securities Dealers (“NASD”) requires that we notify you in writing of the availability of an investor brochure that includes information describing the NASD Regulation’s Public Disclosure Program (“Program”). To obtain a brochure or more information about the Program or NASD Regulation, contact the NASD Regulation Public Disclosure Program Hotline at (800) 289-9999, or access the NASD web site at www.nasdr.com.

SEC Rule 606 (formerly SEC Rule 11Ac1-6)

1500 Main Street, Springfield, MA 01115 Phone: 413-733-5111 Fax: 413-747-0848
100 Pearl Street, Hartford, CT 06103 Phone: 860-727-9530 Fax: 860-727-9269
Toll Free: 800-443-7624

www.stgermaininvestments.com

DJ St. Germain routes customer order to various venues for execution. Rule 606 requires that we post a report outlining these venues to our web site, as well as make the report available upon request for the prior six month period. Any customer desiring a written copy of this report should contact us and ask for a “Order Routing Disclosure”.

SEC Rule 17a-3 (Complaints Regarding Accounts)

Any account holder wishing to contact St. Germain regarding complaints on their account should contact Michael Matty at 1500 Main St., 25th Floor, Springfield MA 01115 or call at (413) 733-5111.

SIPC Disclosure

Customers can obtain information about SIPC (including the SIPC brochure) by contacting SIPC by phone at (202) 371-8300 or by going to the SIPC website (www.sipc.org).

Customer Identification Notification

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver’s license or other identifying documents.