



January 2, 2019

To Whom It May Concern:

Bank of America Corporation is a bank holding company headquartered in Charlotte, North Carolina, United States of America. Bank of America Corporation is regulated by the U.S. Federal Reserve Bank of Richmond; its subsidiaries in the United States are regulated by several regulatory agencies including, but not limited to the Office of the Comptroller of the Currency, the Securities and Exchange Commission, the Commodity Futures Trading Commission and the Financial Industry Regulatory Authority. Outside the United States, Bank of America Corporation's subsidiaries are subject to local regulatory oversight. Bank of America Corporation is publicly owned and listed on the New York Stock Exchange (symbol: BAC). Bank of America Corporation and its subsidiaries (collectively "Bank of America") make every effort to remain in full compliance with all applicable anti-money laundering laws, rules and standards in the jurisdictions in which it does business.

As required by law, Bank of America has designated a Chief Financial Crimes Compliance Executive who leads a team of employees with experience in this field to oversee Bank of America's anti-money laundering efforts. Bank of America has developed and implemented a risk-based anti-money laundering program comprising written anti-money laundering policies, procedures, internal controls and systems, which include but are not limited to the following: a customer identification program and procedures; procedures to collect and refresh, as appropriate, customer due diligence information; processes to assess risk at both the program and customer level; processes and systems to monitor customer transactions and activity; processes and systems to identify and report suspicious activity; and processes to keep required records. As part of its customer due diligence efforts and customer identification program, Bank of America positively identifies and verifies the identity of its customers and beneficial owners of certain legal entities, conducts due diligence on its customers to understand the nature and purpose of the relationship for the purpose of developing a customer risk profile, and conducts on-going monitoring of its customers' activity to identify and report suspicious activity.

Bank of America educates appropriate employees and related third parties in applicable aspects of financial crimes laws, rules and regulations, as well as the Company's anti-money laundering requirements and money laundering prevention. The Bank of America anti-money laundering program is subject to annual independent testing. Bank of America cooperates fully with law enforcement and regulatory investigations and inquiries. Bank of America does not do business with "shell banks."

Sincerely,

William J. Fox
Managing Director and
Global Financial Crimes Compliance Executive