

Business Continuity Disclosure Statement

We always strive to provide the utmost care and security to our clients' personal information. As part of this objective, we have put together a plan to address the possible risk of a business interruption and the actions that will be taken due to such an event. Risk assessment ranges from the most likely (a simple temporary power outage for instance) to the inhabitability of our office building (such as a fire).

The primary concerns with any of these events are the protection of our client data and the ability to access their funds. In this regard, should a business disruption occur, our clients' investments are always available through our custodians such as Fidelity Institutional, Schwab Institutional, and National Advisors Trust Company (NATC). However, critical money management functions need to be performed and the ongoing relationship with our clients must be maintained with very little or no interruption.

Our plan has been created with a view of continuing normal operations. The first level of security rests with the location of our central server system. Our system is hosted in a high security, data center. The data center is monitored 24/7, is climate controlled, has two levels of backup power and several redundant network connections to the outside network and is SAS 70 compliant. In addition, we perform nightly backups based on an industry-wide best practice using off-site tape storage.

Should our building become uninhabitable, all telephone calls would revert to our Florida office. Because of the design of our network, our employees are able to connect remotely to our network from their homes through private networking software. Our employees are thus able to access all software applications and perform virtually all the duties they normally perform while on the company premises. It is the policy of our firm to operate as a "paperless" office to the fullest extent possible. To that end, all client documents are scanned (then shredded or returned to client) into a document management system electronically so that documents are available on our secure network. This minimizes the risk of documents being destroyed in a fire or other disaster.

A copy of individual client contact information is stored with the senior officers of the company and should an interruption occur, clients will be contacted and informed as to the situation and when the systems will be restored.

Our plan is a continual process and as such, will be updated and communicated to our clients and employees as changes occur.