

Summary Disclosure Statement

This summary disclosure is intended to provide an overview of the plan and should not be relied upon as definitive. Due to the sensitive nature of the planning documents content of individual plans may not be disclosed outside of the firm. While no contingency plan can eliminate all risks associated with service interruptions, we maintain back up facilities and arrangements and continually asses, test, and update our Disaster Recovery and Business Continuity Plan to mitigate all reasonable risk.

The plan is subject to modification and an updated summary will be promptly posted on your Web site, and customers may alternatively obtain updated summaries by requesting a written copy by mail.

In the event of a disruption to a single building, business district, city-wide, or region firm has alternative locations from which business would be transacted. In the event of a Significant Business Disruption, Adviser will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail. All states in which we currently transact business would be maintained with the best means available.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

In the event of a firm-only business disruption such as loss of key personnel, we have a plan in place for other investment adviser representatives to respond to immediate client needs while remainder owner executes necessary steps to maintain client experience. The remainder owner will utilize the expertise of FP Transitions and Attorney James Callahan to assist in said execution. The contact information for each follows:

FP Transitions
4900 Meadows, Suite 300
Lake Oswego, OR 97035
503-212-2030

James M. Callahan, Esq.
Atkins Callahan, PLLC
880 West Main Street
Hyannis, MA 02601
508-681-1235