

SPENCER EDWARDS' BUSINESS CONTINUITY PLANNING

Spencer Edwards, Inc. ("SEI") has developed a Business Continuity Plan outlining our response to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we must be flexible in responding to actual events as they occur. Therefore, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (303) 740-8448 or (800) 288-8448, you should go to our web site, www.spenceredwards.com. If you cannot access us through either of those means, depending on where your account is held, you should access our clearing firm, Alpine Securities, Inc., ("AST") at their website, www.alpine-securities.com, or Sterne Agee & Leach, Inc., ("SAL") at their website, www.sterneagee.com, for instructions as to on how it may provide prompt access to your funds and securities, enter orders and process other trade-related, cash, and security transfer transactions for your account.. Alpine Securities, Inc.'s Business Continuity Plan can be viewed at www.alpine-securities.com. Sterne Agee & Leach, Inc.'s Business Continuity Plan can be viewed at www.sterneagee.com.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Both our clearing firms back up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors such as time of day and the severity of the disruption, we have been advised by our clearing firms that their objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments within minutes of an incident. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within a matter of hours. In a disruption affecting our business district, city, or region, we will transfer operations to our clearing firm if necessary, and you will either be contacted by your SEI account executive or notified through our web site www.spenceredwards.com on how to contact us. In either situation, we plan to continue in business. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at:

Spencer Edwards, Inc. Business Continuity Plan
6041 South Syracuse Way, Suite 305
Greenwood Village, Colorado 80111
(800) 288-8448 or (303) 740-8448 or via facsimile at (303) 874-1090
Or e-mail @ info@spenceredwards.com