



SPENCER EDWARDS, INC.

PRIVACY POLICY

June, 2006

Pursuant to the U.S. Securities and Exchange Commission regulation entitled "Privacy of Consumer Financial Information," otherwise referred to as "Regulation S-P," Spencer Edwards, Inc. ("SEI") provides the following information as it pertains to personal information you have provided in the course of establishing your customer account with us.*

In order to transact securities business on your behalf, SEI collects nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information received from credit or service bureaus or other third parties; and
- Information about your transactions with us or others.

We do not disclose any nonpublic personal information about you to anyone, except under the following circumstances:

- To your authorized registered representative and his or her manager;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker* providing services to you and/or SEI; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice. Customer private information that is no longer required to be retained by the Firm will be shredded prior to disposal.

SEI restricts access to your personal and account information to those individuals who need to know that information to provide products or services to you. SEI maintains physical, electronic and procedural safeguards to guard your nonpublic personal information.

SEI regularly reviews and updates its information security program to keep pace with changes in technology.

SEC REQUIRED REPORT ON ROUTING OF CUSTOMER ORDERS

All brokerage firms are required to make publicly available quarterly reports on the routing of non-directed orders. This information can be obtained via SEI's website at www.spencerredwards.com under the "Report" section or, upon request to Customer Service at (303) 740-8448, SEI will provide you with the name of the market center or exchange utilized to execute a specific order. The specific order must have been processed within the past six (6) months from the date of your request.

SEC REQUIRED REPORT ON PAYMENT FOR ORDER FLOW

Securities and Exchange Commission (SEC) Rule 11Ac1-3 requires all broker/dealers notify their customers of their payment for order flow practices on an annual basis. Your broker/dealer routes orders through Emmett A. Larkin Company, Inc. as well as other broker/dealers. SEI does not receive compensation for directing order flow.

CUSTOMER COMPLAINTS

Please be advised that any customer complaints can be made in writing and directed to: Spencer Edwards, Inc., Attn: Compliance Department, 6041 South Syracuse Way, Suite 305, Englewood, CO 80111, or by facsimile to the attention of Gordon D. Dihle, (303) 874-1090.

* SEI is an introducing securities broker-dealer. All customer transactions are cleared through another broker-dealer, Emmett A. Larkin Company, Inc. A copy of their Privacy Policy was sent to you when your account was established with them and annually thereafter. It can be found on their website at www.larkinonline.com.