

Disaster Recovery and Contingency Plan Summary Disclosure Statement

Woloshin Investment Management (WIM) has devised a Disaster Recovery and Contingency Plan in order to effectively address and state the specific steps which we shall use and employ in order to recover from any Significant Business Disruption (SBD). In the event of a SBD we will make every effort to contact clients in a reasonable time frame to keep them informed. Also, we will update our website and phone system answering machine with any information to keep our clients informed.

Our firm's policy is to respond to a SBD by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our clients to transact business in a secure manner.

Our employees are one of our most valuable resources. We make every effort to protect them from harm at the workplace and to retain them. In the event of a disaster, employees are informed to check with one of the key personnel to receive instructions.

Our physical location could become unusable for many reasons. Regardless of the cause the impact would be the same, but the duration could be longer. This section focuses on the variety of scenarios we can envision and our responses to them.

- Short-term disruptions that cause our building to be unavailable for time frames of less than one month. The following is a list of possible causes: power outages, broken HVAC, weather emergencies, or evacuations. To deal with this we would operate at a remote location; possibly out of our homes, a suite in another professional's office, or a suite/ballroom at a local hotel. Employees are to check in with management via their home phone or cell phone to be informed of place of operation. Vital equipment will be transported to site if possible or borrowed or leased at the location of operation. If needed, data will be restored from one of many different forms of data backups we have in place. Phones are to be forwarded.

- Intermediate-term disruptions that cause our building to be unavailable for a time frame of more than a month and less than a year. The following is a list of possible causes: fire, contamination, flood damage, or building structural problems. If we do not know the magnitude at the time of the event, we will utilize the short term disruption plan, above until it is clear that the time frame will exceed one month. We will lease temporary space from a business associate or through a commercial realtor. All equipment and files will be moved or replaced and phone lines will be transferred to the new location. Once our building is back online everything will be moved back.
- Permanent loss of use of building. The following is a list of possible causes: fire, flood, or terrorist attack. At the time of the event we should know the severity of the event and would go right to the intermediate-term disruption plan and find new permanent office space.

In the event of a wide-scale emergency on a local or national level we would monitor information from state and federal authorities and make all decisions to get our operations open when deemed safe by authorities.

We have a primary responsibility for establishing and maintaining our business relationships with our clients and have a primary responsibility for our mission critical functions which include portfolio management, access to client accounts and the delivery of funds to our clients. TD Ameritrade provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of client accounts, access to client accounts, and the delivery of funds and securities via its propriety trading system - Veo.

The disaster/contingency plan is to be review at least annually.