

Brewer Financial Services, LLC

Business Continuity and Disaster Recovery Plan

I. Emergency Contact Persons

Our firm's two emergency contact persons are:

Adam Erickson – Managing Principal

Phone 608-220-8357

Email aerickson@brewerinvestmentgroup.com

Edward. Arana - CFO

Phone 312-896-3957

Email earana@brewerinvestmentgroup.com

These names will be updated in the event of a material change, and FINOP will review them within 17 business days of the end of each quarter.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (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 customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

B. Approval and Execution Authority

Adam Erickson, Managing Principal, a registered principal, is responsible for approving the plan and for conducting the required annual review. Edward Arana, CFO, has the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on the server located at the main office of Brewer Financial Services, LLC at 200 S. Michigan Ave. 21st Floor, Chicago, IL.

III. Business Description

Our firm conducts business in corporate debt and equity securities, variable life insurance and annuities, U.S. Government Securities, mutual funds, options, private placement securities, and municipal securities. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services retail and institutional customers.

Our clearing firm is National Financial Services, Inc., located at 200 Seaport Blvd., Boston, MA 02110, 800-877-2410, www.nationalfinancial.com, and our contact person at that clearing firm is Karen Mathews, 312-529-2307, kmathews@fmr.com.

IV. Office Locations

A. Office Location #1 (Main Office)

Our Location #1 Office is located at 200 S. Michigan Ave. 21st Floor, Chicago, IL. Its main telephone number is 312-896-3930. Our employees may travel to that office by means of foot, car, train or bus. We engage in order taking and entry at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected offices to temporary office space at one of our clearing firms.

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, National Financial Services, Inc. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting Rob Shea, Account Manager at NFS, (800) 291-5318 Ext: 33458. The firm will make this information available to customers through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

VII. Data Back-Up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary hard copy books and records and its electronic records at its main office 200 S. Michigan Ave. 21st Floor, Chicago, IL. Adam Erickson, Managing Principal, 312-896-3930, is responsible for the maintenance of these books and records.

Our firm maintains back-up hard copies of the new account forms at the home office at 200 S. Michigan Ave. 21st Floor, Chicago, IL. There is another copy of the new account forms that is maintained with the clearing firm (NFS), which is at a different location.

All other records maintained by BFS, as indicated below, are backed up to electronic formats:

- Accounting and administrative files, including the general ledgers, financial statements, monthly performance, and Focus Part IIA Reports.
- Daily Activity and performance files
- All brokerage and other operational reports

The firm's electronic records are incrementally backed up daily with a full backup done each Friday. The data is held offsite on the secured servers of ChiNetworks. Located at 619 S. LaSalle Street, Suite 101, Chicago, IL 60605, 312756-1500. The brokerage and other operational reports received from the clearing broker (NFS) will also be backed up and maintained by the clearing broker as part of their business continuity plan.

In the event of an internal or external SBD that causes the loss of our paper records (customer account documents are the only records maintained by BFS in paper only format), we will get a new paper copy of the records from our clearing broker (NFS).

In the event of an internal or external SBD that causes the loss of our electronic records, we will recover the tape from our back-up site.

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our Web site, telephone voice mail and secure email. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our clearing firm, critical banks, and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our parent company or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps.

IX. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities. More specifically, these systems include Excel, Word, Acrobat, and Outlook Express.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking and order entry. Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business and presented us with an executive summary of its plan, which is attached. In the event our clearing firm executes its plan, it represents that it will notify us of such

execution and will provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing, and it has confirmed that it tests its back-up arrangements on a periodic basis.

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. Our clearing firm has indicated that their data would be restored and up and running in matter of hours following a SBD.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from customers via telephone/fax/e-mail/ or in person visits by the customer. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by email or phone. If necessary, we will advise our customers to place orders directly with our clearing firm at National Financial Services.

2. Order Entry

Currently, our firm enters orders by recording them on paper and electronically and sending them to our clearing firm electronically or telephonically. Alternatively we can place customer orders through NFS's on-line system called Streetscape. We have contacted NFS regarding this system and were told that, under its BCP, we can expect service to be restored within a matter of hours.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include phone or fax. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations. In

addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order execution order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

X. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits at our firm or at the other's location. In the event of an SBD, we 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 e-mail 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.

B. Employees

We now communicate with our employees using the telephone, e-mail, and in person. In the event of an SBD, we 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.

C. Regulators

We are currently members of the following SRO: NASD. We communicate with our regulator using the telephone, e-mail, fax, U.S. mail, and in person. In the event of an SBD, we 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.

XI. Critical Business Constituents, Banks, and Counter-Parties

A. Business constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our

business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

B. Banks

We have contacted our banks to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is Chase, NA, 10 S Dearborn., Chicago, IL 60603, 312-732-2181 and our main contact for our account is Christopher Stine. If our bank is unable to provide the financing, we will seek alternative financing immediately from another bank.

C. Counter-Parties

We have contacted our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

XII. Regulatory Reporting

Our firm is subject to regulation by the NASD. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC, NASD, and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

XIII. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at account opening. We also mail it to customers upon request. Our disclosure statement is attached.

XIV. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

XV. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Signed: _____

Title: Managing Principal

Date: _____

Brewer Financial Services, LLC
Business Continuity Plan
Disclosure Statement

At Brewer Financial Services, LLC (the “Company”) we are proud of our back-up and redundancy capabilities. All software and data necessary to operate the Company will be backed up 3 times per week to a tape and placed in a locked file cabinet at an offsite location. Thus, the basic operations of the basic operations of the Company can be conducted from any location with sufficient computer and telephone resources to access the backup data from the tape.

In the event of a significant business disruption, the Company can access the back-up tapes and begin operations at an established backup facility, which is operated on a separate communications and power grid from the Company’s main office.