

SECURITIES AMERICA'S BUSINESS CONTINUITY PLAN DISCLOSURE

We have developed a comprehensive business continuity plan (“the Plan”) that covers the broker-dealer operations of Securities America, Inc., advisory services of Securities America Advisors, Inc. and advisory services of Arbor Point Advisors, LLC collectively referred to as the “Companies.” The Companies are owned by Securities America Financial Corporation. While each of the Companies operates as a separate entity they may share certain personnel and facilities in providing, as necessary and appropriate, administrative and support services for their respective clients. The Plan is designed to ensure that the Companies are prepared to continue providing service to our clients in the event that we experience a significant disruption of any kind to our business operations. The Plan addresses business disruptions of varying severity and scope at our headquarters; provides for frequent testing, testing in response to any material changes affecting our business and takes into consideration our critical third-party relationships.

As part of our Plan, we have developed a proprietary, geographically diverse back-up facility complete with space for key employees as well as telephones, computers, and other necessary hardware. This proprietary facility is located on a separate power grid from our headquarters and is serviced by a different power provider. It has local and long-distance telephone service providers that are distinct from those that service the Companies' headquarters.

What follows is a description of how the Companies intend to respond to the following four types of disruptions: (1) a firm-only disruption, (2) a disruption that affects a single building, (3) a disruption that affects the entire city or business district, and (4) a disruption that affects the entire Midwest region. We have also included information about how long we expect it would take us to recover from these disruptions.

Firm-Only Disruptions

To respond to a disruption that affects only the Companies or one of the companies individually, such as a computer virus, we have developed an emergency response/crisis management team. This team has successfully guided us through disruptions through the use of a crisis communications system and through procedures that address life, health, and safety issues; damage assessment; damage mitigation; personnel mobilization; and mission-critical systems. If this type of disruption takes place, we intend to restore all critical services within one day after the disruption occurs. However, in light of the various types of disruptions of this nature that could take place, it may take longer for us to resume operations in one or more services during any particular disruption.

Disruptions that Affect a Single Building

In the event of a disruption that affects the Companies' headquarters and data centers, such as a fire in the building, our Plan calls for a response involving multiple locations. We would resume critical services by moving key personnel to our Emergency Operations Center, and, to the extent necessary, to our back-up facility. Certain key personnel may also work remotely by connecting to the Companies' network from a remote location. In addition to relocating key personnel to back-up facilities, we would, if necessary, transfer responsibility for certain operations and support services to our offsite offices. We intend to resume operations in all of our critical service areas within one day after a disruption of this nature occurs. It may, however, take two to three days, or longer in some instances, to resume doing business in one or more critical service areas depending on the availability of data and applications from our data centers.

Disruptions Affecting the Entire City or Business District

If a disruption significant enough to affect the entire city or business district, such as a terrorist attack, cuts off access to the Companies' headquarters, under our Plan we would resume critical services at our back-up facilities and certain of the Companies' offsite locations. As above, certain key employees would work

remotely, and certain operations and support services would be handled by other of the Companies' offices. We intend to resume operations in all of our critical service areas within one day after a disruption of this nature occurs. It may, however, take three to four days, or longer in some instances, to recover depending on the availability of data and applications from our data center and on the availability of key employees.

Disruptions Affecting the Entire Midwest Region

In the event of a disruption that affects the entire Midwest region such as a regional power outage, we would resume critical service areas from back-up facilities and certain of the Companies' offsite locations. Although the Companies intent is to resume operations within one day after the disruption occurs, one or more of our critical service areas may not be able to resume operations until the disruption is over.

In all of the situations described above, the Companies expect to continue doing business and expect to resume operations within the specified time frames. However, in the event that a business disruption results in a significant loss of life at our headquarters or otherwise results in our key employees being unavailable or unable to report to their designated back-up facility, the recovery times described above may be significantly increased. Furthermore, although we expect to continue operating regardless of the type of disruption, it is impossible to anticipate every scenario. It is, therefore, possible that a significant business disruption could result in the Companies deciding that we are unable to continue doing business. In those situations, our Plan provides procedures to help ensure that our customers have prompt access to their funds and securities.

Client Access to their Funds

A site outage should not impact a client's ability to access their available funds, as the Plan is designed to ensure sustained service. As a general practice, the Companies do not hold customer funds or securities. Funds and securities are held either by the clearing firms at which the client's account is established or directly at the product sponsor. Since client funds and securities are not held at by the Companies, they remain accessible directly through the clearing firm or product sponsor, despite any site outage. Telephone numbers at which the client may reach the clearing firm or direct sponsor company that maintains custody of their account are listed in the client's account statements. Please note that a client's ability to trade securities may be impacted by market events outside our control, such as when the markets were closed following 9/11. Our Plan provides for necessary personnel being available to approve transactions that result in the disbursement of available funds.

Communication w/Regulators

In the event of a business interruption that disables the home office communication systems, the Companies' Compliance Department(s) management staff all maintain back-up access to electronic data storage and reporting systems through multiple independently networked work sites, including wireless access. Moreover, the Companies' primary transaction reporting is done through third party market participants. With respect to business interruptions that may have a material impact on the liquidity of customer accounts, each company's Compliance Department would notify regulators as is appropriate under the then current circumstances.

We continue to devote substantial resources to the enhancement of our business continuity planning. We are continuing to assess how our Plan takes into consideration our critical third-party relationships; and ensure its coverage of all of the Companies' locations. We may enter into agreements with other firms to perform certain clearing services and administrative functions on our behalf in the event of a disruption, until we have the capability to resume performing those tasks.

The Companies' Plan is subject to modification. We will publish information regarding updates or modifications to the Plan on our website at <https://www.securitiesamerica.com>. Updated information about the Plan can be obtained by mailing a request for a written copy. All requests for updated information should be sent to the following address:

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