

Business Continuity Plan Disclosure

Policy

As part of its fiduciary duty to its clients and as a matter of best business practices, WestFuller has adopted policies and procedures for disaster recovery and for continuing WestFuller's business in the event of an emergency or a disaster. These policies are designed to allow WestFuller to resume providing service to its clients in as short a period of time as possible. These policies are, to the extent practicable, designed to address those specific types of disasters that WestFuller might reasonably face given its business and location. As the technology used in disaster recovery as well as ways disasters may occur are evolving, WestFuller shall periodically evaluate the policies and procedures and update them as is necessary.

Background

Since the terrorist activities of September 11, 2001, all advisory firms need to establish written disaster recovery and business continuity plans for the firm's business. This will allow advisers to meet their responsibilities to clients as a fiduciary in managing client assets, among other things. It also allows a firm to meet its regulatory requirements in the event of any kind of an emergency or disaster, such as a bombing, fire, flood, earthquake, power failure or any other event that may disable the firm or prevent access to our office(s).

Contacting Us

If after a significant business disruption you cannot contact us as you usually do at (212) 542-5850 or with one of our staff through their email, you should be able to access your account information, including execution of transactions, disbursements of cash etc. through our primary custodian Pershing at the fax number below. You should also check our website - www.westfulleradvisors.com for timely notices regarding any business disruption.

Instructions to Pershing must be in writing and transmitted via facsimile or postal service as follows:

- Pershing LLC
- P.O. Box 2065
- Jersey City, New Jersey 07303-2065
- Fax: (201) 413-5368

Responsibility

As Compliance Officer, Ian Fuller is responsible for overseeing WestFuller's Disaster Recovery and Business Continuity Plan. The Designated Officer(s) shall maintain and implement the specific elements below.

Procedure

As relates to disaster recovery, WestFuller has adopted the following procedures to implement the firm's policy, monitor and ensure the firm's policy is observed, and review and amend or update the policy and procedures, as appropriate:

- The following individuals have the primary responsibility for implementation and monitoring of our Disaster Recovery Policy:

- The Designated Officer is responsible for documenting computer back-up procedures, i.e., frequency, procedure, person(s) responsible, etc.
 - The Designated Officer is responsible for designating back-up storage locations(s) and persons responsible to maintain back-up data in separate locations.
 - The Designated Officer is responsible for identifying and listing key or mission critical people in the event of an emergency or disaster, obtaining their names, addresses, e-mail, fax, cell phone and other information and distributing this information to all personnel.
 - The Designated Officer is responsible for designating and arranging for “hot,” “warm,” or home site recovery location(s) for mission critical persons to meet to continue business, and for obtaining or arranging for adequate systems equipment for these locations.
 - The Designated Officer is responsible for establishing back-up telephone/communication system for clients, personnel and others to contact the firm and for the firm to contact clients.
 - The Designated Officer is responsible for determining and assessing back-up systems for key vendors and mission critical service providers.
 - The Designated Officer is responsible for conducting periodic and actual testing and training for mission critical and all personnel.
- WestFuller’s disaster recovery systems will be tested periodically.
 - WestFuller’s Disaster Recovery Plan will be reviewed periodically, and on at least an annual basis, by the Compliance Officer.
 - Our primary custodian, Pershing backs up our important records in a geographically separate area. In addition, given their size, Pershing has call center and data backup locations throughout the country. All data back up and calls can be re-routed based on the service disruption. We have been advised by Pershing that while every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, it is their objective to restore its operations and be able to complete existing transactions and accept new transactions, payments and disbursements very quickly. However, during this time of interruption, your orders and requests for funds could be delayed.

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. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area. In either situation, we plan to continue in business and notify you through our web site www.freestonecapital.com. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers' prompt access to their funds and securities.

For more information

If you have questions about our business continuity planning, you can contact us at (212) 542-5851 or 5 Union Square West, Ste. 602, New York, NY 10003.