

Privacy Policy and Notice

Pursuant to enactment of the Gramm-Leach-Bliley Act, the Securities and Exchange Commission issued Regulation S-P (hereafter, Reg S-P) requiring Investment Advisers to formulate and implement policies and procedures to protect Non-Public Personal Information (hereafter, information). This notice is being provided to inform you of our Policies and Procedures regarding information we have collected on you.

We collect certain information about you for two reasons. First, to understand your unique personal situation so we can provide advice that is both suitable and prudent. Second, as is required by applications for specific financial products and services offered through various financial institutions which include broker dealers, custodians, mutual funds, insurance companies and others. Other than as referenced above, we consider the information you provide to us to be confidential and, therefore, do not sell any of this information to anyone for marketing or any other purpose. We may share information with others who perform services on our behalf pursuant to a contractual agreement.

Additionally, we have written policies and procedures that all employees have read and understand that are designed to protect the confidentiality of information about you. These policies and procedures are in effect for information collected by us whether you are a current customer or not.

Reg S-P requires financial service companies to establish procedures to permit you to restrict the dissemination of information, called, opting-out, in certain situations, namely, when information is shared or sold to non-affiliated third parties or in cases where information is provided that is not necessary to effect, administer, or enforce a transaction that a consumer requests or authorizes. Inasmuch as we do not release information as referenced immediately above, we are not establishing an opt-out procedure.

We value greatly our relationship with you. We understand you have entrusted us with certain important personal information and we intend to fully implement the Policies and Procedures as referenced above and keep that information as confidential as practical. If you have questions about this issue please call us at (303) 770-3030.

Effective April 10, 2008