

Business Continuity Plan (BCP)

Emergency Contact Persons

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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 the firm's books and records, and allowing our customers to transact business. If we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs. 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 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.

Approval and Execution Authority

Rembert D. McNeer, VP & CFO, a General Securities Principal, is responsible for approving the plan and has the authority to execute the BCP.

Business Description

Our firm conducts a general securities and investment advisory services business. We are an introducing firm and we do not perform any type of clearing function and do not hold customer funds or securities. We accept and enter orders at our clearing firm, which 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 clearing firm is National Financial Services, LLC, (NFS) 82 Devonshire St., Boston, MA, 02109-3605, 617-563-7000, and our contact Client Service Manager at NFS in the event of an outage can be reached at 800-877-2410, fax 508-229-9112.

Other orders for mutual funds or other investments are placed directly by paper applications and checks with the investment companies. Investment management is through both proprietary and outside sources with the funds held at our clearing firm or at the outside money management firms.

Alternative Physical Locations of Employees

In the event of an SBD, we will notify our staff by telephone or e-mail of our closest unaffected office location. The location(s) will also be posted on our website, www.sfrintranet.com. Our staff can access their e-mail by logging in at mail.sfr1.com or calling 1-800-965-2933.

Customers' Access to Funds and Securities

Custody of customers' funds or securities are maintained at our clearing firm, NFS. In the event of an SBD, if telephone service is available, our registered person 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, www.summitequities.com, that customers may access their funds and securities by calling or e-mailing a designated employee who will be identified on the web site.

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.

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

Our firm maintains its primary hard copy books and records and its electronic records at our office at 4 Campus Drive, Parsippany, NJ. Rembert D. McNeer, VP, CFO 973-285-3602 is responsible for the maintenance of these books and record.

We do not maintain back-up hard copies of our books and records. However, these books and records can be reproduced utilizing our electronic back-up system. In addition, all client accounts and investment information are held at NFS or directly at the investment companies and the information can be retrieved from the clearing firm or the investment company.

The firm backs up its electronic records each evening. The electronic back-up tape is taken off site the next day, kept at the home of our Information Technology supervisor for a day, then returned to our office and is replaced by a new and current back-up tape.

Financial and Operational Assessments

Operational Risk

In the event of an SDB, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, and regulators. Although the effects of an SDB will determine the means of alternative communication, the communications options we will employ will include our Web site, telephone voice mail, secure e-mail and regular mail.

Financial and Credit Risk

In the event of an SDB, 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 shareholders 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 bank 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.

Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking and entry, processing paper applications and checks, and managing client investment portfolios.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions or order taking and entry. NFS 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.

NFS has provided us with its Contingency Planning Statement that is available to our employees at our intranet site, www.sfrintranet.com. In the event there is a SBD, we will follow the plan in order to maintain that portion of our business.

NFS represents that it backs up our records at a remote site. NFS 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. NFS has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing its back-up arrangements on a periodic basis.

Order Taking

Currently, our firm receives orders from customers via their registered representatives at Summit. The customers can use the telephone, fax, e-mail, or personal visit. During an SBD, 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 their reps. Customers will be informed of alternatives by contacting our web site, www.summitequities.com.

Order Entry

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 a remote access site where we can connect electronically to our clearing firm's FBSI system and/or its StreetScape™ System. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver to the clearing firm by the fastest means available when operations resume.

Mission Critical Systems Provided By Our Clearing Firm

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

Alternate Communication Between the Firm and Customers, Employees, and Regulators

Customers - We now communicate with our customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits. In the event of an SBD, we will assess which means of communications are still available to us and use the means closest in speed and form to the means that we have used in the past to communicate with the other party.

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 to the means that we have used in the past to communicate with the employee(s). We will also employ a calling chain, that is posted on our intranet site, www.sfrintranet.com so that senior management can reach all employee quickly during an SBD. The calling chain includes all staff home, office phone, and cell phone numbers. The person in charge who will invoke the use of the calling chain is Rembert D. McNeer, a general securities principal.

Regulators - We are currently members of the FINRA. We communicate with our regulators using the telephone, e-mail, fax, U.S. mail, and the FINRA Web sites. In the event of an SDB, we will assess which means of communication are still available to us and use the means closest in speed and form to the means that we have used in the past to communicate with the FINRA.

Critical Business Constituents and Banks

Business constituents - We have contacted our critical business constituents (business with which we have an ongoing commercial relationship in support of our operating activities), 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.

Banks - We have contacted our banks and lenders 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: Capital One, Route 46, Little Falls, West Paterson, NJ 07424, Phone 973-890-1500 - Contact - Walter Kilpatrick.

Regulatory Reporting

Our firm is subject to regulation by the SEC, the FINRA and the NJ Bureau of Securities. We now file reports with our regulators, as needed, 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, FINRA, and other regulators to determine which means of filing are still available and use the means closest in speed and form 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. Our FINRA liason is Belinda Chan, Senior Examiner/Coordinator, at 581 Main Street, Ste 710, Woodbridge, NJ, 07095-1164 Phone 732-596-2000, and Fax 732-596-2003.

Disclosure of Business Continuity Plan

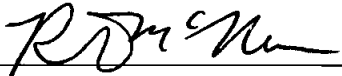
We disclose in writing that a summary of our BCP is available to customers at account opening and mail it to customers upon request. It is also available on our website.

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, we will review this plan annually to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

Senior Manager Approval

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

Signed: 
Title: VP
Date: 1/31/09