

BUSINESS CONTINUITY PLAN FOR THE SPARTAN GROUP LLC

The Spartan Group LLC (or "TSG"), as part of its normal plan to provide excellent customer service, has developed a Business Continuity Plan (or "BCP") on how it will respond to events that significantly disrupt its business. Since the timing and impact of disasters and disruptions are unpredictable, TSG will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our BCP.

Contacting Us: As a part of our normal business operations, our clients are provided with full contact information for the TSG employees servicing their engagements. This is done, along with other means, by distribution of a "working group list" that provides business phone, cell phone, fax phone, home phone, email address, and "snail-mail" address for both business and home. If you have trouble reaching anyone at TSG, you should call us at (626) 204-6376 or (415) 388-5684 or visit our web site at www.SpartanTSG.com.

TSG's Business Continuity Plan: TSG plans to quickly recover and resume business operations after a significant business disruption and respond to such conditions by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and providing our customers with continued service. In short, our BCP is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. Our BCP addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, and bank impact; regulatory reporting; and assuring our customers prompt access to TSG's financial advisory services.

Varying Disruptions: Significant business disruptions can vary in their scope and scale, and may only impact our firm or parts of our firm, or may impact a broad region incorporating all parts of our firm and the major or all parts of the national or global economy. 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 parts of our firm, TSG will transfer our operations to local sites when needed and expect to recover and resume business within two business days. In a disruption affecting our business region, we will transfer our operations to a site outside of the affected area, and recover and resume business within five business days. In either situation, we plan to continue in business, transfer operations and notify you directly if possible or through our web site www.SpartanTSG.com or by phone message left at (626) 204-6376.

For More Information: If you have questions about our business continuity planning, you can contact us at Peter@SpartanTSG.com or by calling (626) 204-6376.