

BUSINESS CONTINUITY PLAN

There are four Fountain advisors who operate individual financial planning practices under the Registered Investment Advisor umbrella of Fountain Strategies LLC. For the most part, daily business activities involve phone and email communications, with clients, with custodian brokers, to and from the firm's archives, and with support services. In terms of operational business continuity, each advisor's practice is "mobile" and can continue anywhere there is access to the internet. In terms of advisor continuity in the event of local disaster, retirement, disability, or death, clients of one advisor will continue to be served by the firm's other active advisors following standardized operating procedures. Also, there is a transfer of ownership protocol in place, in the event of disability or death of the LLC sole member.

Each advisor's mailing address, phone and fax numbers are listed below.

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(408)516-4682 office (408)391-2219 cell (831)621-4640 fax

Manorama (Anita) Pai, Irvine, CA
(949)737-1702 office (949)419-6151 cell (831)621-4640 fax

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Chief among the challenges to business continuity would be loss of power, which would mean loss of internet access. In the event of a local disruption, such as a grid blackout, fire, or earthquake, business can possibly continue uninterrupted through an unaffected Fountain office. Even though disruption on a regional or national scale would cause the firm to shut down until normalcy can be restored, the firm's records and email archives reside "in the cloud" at geographically diverse server farms. In the case of general, sustained loss of power, there is the possibility that USPS mail and overnight mail (e.g., UPS and FEDEX) deliveries might continue.

It is worth noting those services the firm *does not* perform for clients: Fountain advisors have no discretionary powers over client account assets other than quarterly fee billing, Fountain does not custody any client assets, and there is no reason to pursue intensive transactions within client portfolios. Further, clients can continue operations directly with their custodian as long as they have internet access.

In case of a major disruption, there should be no appreciable short-term impact upon the firm's financial well-being. The firm's operating account funds are accessed on-line rather than in a local bank. Bills are anticipated one fiscal quarter in advance. Unless regular mail and overnight mail services are available, a prolonged regional or national disruption would prevent collection of client billings, delay payments to service providers, and prevent quarterly fee distributions to Fountain and its advisors.