PRODUCTS:

It is the responsibility of each registered representative of this firm to be familiar with the products we handle and especially those he specializes in. A firm principal shall be responsible for implementing compliance and regulatory guidelines for all products.

Recommendations/Suitability

RRs shall obtain comprehensive client information using the Client Account form. Information collected can then be used to make suggestions to accommodate each client's investment goals.

a. The RR shall discuss sales charges, expenses and management fees with the client.
b. A Breakpoint Discounts Disclosure Statement shall be given to each potential mutual funds purchaser.
c. The Breakpoint Disclosure area of the CAF shall be "checked" after the discussion.

Share Classes

Since most mutual funds now have multiple classes of shares available to the public, RRs shall familiarize themselves with the different share classes in order to aid the client in choosing the method of purchasing shares which best suits his/her particular circumstance:

Class A shares: Up-front sales charge and service fee

Class B shares: Asset-based sales charge, service fee, declining CDSC

Class C shares: Asset-based sales charge, service fee, 12-mo. CDSC

Several mutual funds have initiated new policies to limit the dollar amount which can be invested in B shares and Single purchases that equal or exceed a certain dollar amount will be accepted only for Class A shares.

There are instances when one method of purchasing Shares may be more appropriate than another:

Investors who would qualify for a significant discount from the maximum sales load on Class A shares might determine that payment of such a reduced up-front sales charge is preferable to the payment of a higher ongoing distribution fee on Class B or Class C shares.

Investors who prefer not to pay an up-front sales charge may wish to defer the sales charge by purchasing Class B or Class C shares.

Those who plan to redeem their shares within 5 years might consider Class C shares, particularly if they do not expect to reinvest dividends in additional shares.

If an investor anticipates redeeming Class B shares within a short period of time, such as within one year, that investor may bear higher distribution expenses than if Class A shares had been purchased.

Investors who intend to hold their shares for a significantly long time may not wish to bear the higher on-going-asset-based sales charges of Class B or C shares, irrespective of the fact that the CDSC that would apply to a redemption of Class B shares is reduced over time and is ultimately eliminated, and that the CDSC that would apply to a redemption of Class C shares is relatively short in duration and small in amount.

Redemptions

Firm personnel do not have discretionary control over client fund accounts.

IRA, Qualified Plans: Clients will be instructed to send their request for partial/full liquidations in writing directly to the fund company.

Non-qualified Plans: Clients will be instructed to call the fund company if they have telephone redemption privileges or

Send their request for redemption in writing to the fund company

Wire Orders

The firm does not accept "wire" orders.

Account Changes

When a client calls to change an address, his identify is verified by asking personal questions. The fund company is notified.

Signature Guarantee

A firm principal can guarantee signatures for clients once a client's identity has been established.

Prospectus/Literature
A prospectus shall be given to a prospective client at the initial presentation. Only sales materials and prospectuses that have been approved by a principal of the firm shall be used in client presentations.
The RR should make sure that all sales materials used in a presentation are up to date.

Breakpoints: Levels of dollar investments at which the front-end sales charge is reduced. Breakpoints are set by the fund companies.

a. Letter of Intent: A statement signed by the client indicating that he intends to invest (over a specified period of time) a certain dollar amount. In return, the client receives a lower front-end sales charge from the initial investment forward.
b. Rights of Accumulation: The linking of various customer accounts for a lower front end sales charge.

Our "firm brochure" shall encompass our breakpoint sheet and our Privacy Notice. Both shall be sent to the client, along with a copy of his Client Account form, and any other related paperwork, within 7 days of purchase.

Switching is the recommendation for a client to move from a fund to a similar fund and should be handled as if it were a new investment. The RR shall follow the requirements of suitability, prospectus delivery, disclosure, etc. A "switch" shall be authorized by the client, in writing.

Selling Dividends: A RR shall not recommend the purchase of a mutual fund by stating that the purchase shortly before an ex-dividend is advantageous to the client...unless he fully explains any tax or other advantages for such a purchase.

Twisting (Churning) is an attempt to sell one product and purchase another (generating two commissions) violates FINRA rules. The RR should always believe that the recommendation is "suitable" for the client based upon information supplied by the client relative to his financial status and needs.