Business Continuity Plan

Twenty-First Securities maintains a business continuity plan (BCP) designed to allow the firm to continue serving clients and provide them with access to their funds and securities in the event of a business disruption. Since the timing and impact of disasters and disruptions are unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessment; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business. The firm recognizes three levels of business disruptions:

Internal disruptions are those that would affect only our office (for example, an office fire). In the event of a serious internal disruption, operations will move either to an alternative location in our building or to the homes of either Robert Gordon or Mark Fichtenbaum.

Local external disruptions are those that would affect New York City (such as a blackout). In the event of a serious local disruption, operations will move to the home of Mark Fichtenbaum.

External disasters are those that would affect both the region and the securities markets, such as a significant terrorist attack. In the event of an external disaster in which we cannot access our offices, the firm will either move operations to the homes of Robert Gordon or Mark Fichtenbaum or suspend operations for a period of time.

Twenty-First Securities does not maintain custody of customers’ funds or securities. These are maintained by our clearing firms and the dealers to which we refer transactions. In the event of a business disruption, we may advise our customers to place orders, and otherwise communicate, directly with our clearing firms and referred dealers. Customers can also access their funds at our clearing firms and referred dealers. If you cannot contact us through your usual means of communication, please check the Twenty-First Securities web site for alternative means of communication or call our alternative phone number (below).

Contact Information:

Twenty-First Securities Corporation: 780 Third Avenue, 24th Floor, New York, NY 10017
Phone: 212-418-6000
Email: mark@twenty-first.com
Web Site: www.twenty-first.com
Alternative Phone: 212-794-5103

Clearing Firms:

RBC Correspondent Services, 60 South 6th Street, Minneapolis, MN. 55402
Phone: 888-462-1816
Web Site: http://www.rbccorrespondentservices.com

Credit Suisse Securities (USA), LLC: 11 Madison Avenue, New York, NY 10010
Phone: 212-325-2000
Web Site: http://www.credit-suisse.com
Contact: Nick Gruber
For all of the above firms, a summary of their Business Continuity Plans can be found on their web sites. For contact information for referred dealers, please contact Robert Gordon or Mark Fichtenbaum.

Twenty-First Securities' business continuity plan is subject to change. This summary disclosure statement may be updated to reflect changes that would affect our customers or professional contacts. This statement is available at www.twenty-first.com. If you have any questions about our Business Continuity Plan, you can contact us at 212-418-6000 or mark@twenty-first.com.