

Business Continuity Plan (BCP)

Emergency Contact Persons

Our firm's emergency contact persons are:

- Michael Bremer – Primary (973) 285-3686, mbremer@sfr1.com, FAX (973) 285-3670
Secondary – (570) 575-3425 mbremer@sfr1.com, FAX (973) 285-3670
- Steven Weinman - Primary – (973) 285-3599, sweinman@sfr1.com, FAX (973) 285-3644
Secondary – (973) 886-1343, sweinman@sfr1.com, FAX (973) 644-2998

These names will be updated in the event of a material change and our Executive Representative will review them at least annually.

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

- A. Significant Business Disruptions (SBDs)
Our plan anticipates two kinds of SBDs, internal and external. 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 terrorist attack, a city flood, or 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.
- B. Approval and Execution Authority
Michael C. Bremer, COO, is a registered principal, and is responsible for approving the plan and for conducting the required annual review. Michael C. Bremer has the authority to execute the BCP. In the absence or inability of Mr. Bremer to execute the BCP, Steven Weinman, CEO, may execute the plan.
- C. Plan Location and Access
Our firm will maintain copies of its BCP and the annual reviews, and the changes that have been made to it for inspection. We have given FINRA District 9 office a copy of our plan. An electronic copy of our plan including our alternative location is located on our intranet site, www.sfrintranet.com.

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 for the firm or others. We 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, 82 Devonshire St., Boston, MA. 02210, (617) 563-7000.

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 and the funds are 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 intranet website, www.sfrintranet.com. Our staff can access their e-mail by logging in at www.mail.sfr1.com.

Customers' Access to Funds and Securities

Our firm does not maintain custody of customer's funds or securities, which are maintained at our clearing firm, NFS. In the event of an internal or external 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. The firm will make this information available to customers through its disclosure policy.

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

Availability of Records In Offices

Required records under Rules 17a-3 and 17a-4 are available in office locations.

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

Our firm maintains its primary hard copy books and records and its electronic records at 4 Campus Drive, Parsippany, NJ. Michael Bremer, COO 973-285-3686 is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm: New Account Forms, etc.

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 our clearing firm, 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 in several manners. Throughout each day there is constant instantaneous electronic redundancy of all systems data between two separate server rooms located on opposite sides of the Parsippany building's floor at Summits Home office location. Additionally each night all system data is automatically backed up to an offsite SSAE 16, SOC 1 Type II compliant data center (DR site) located in a neighboring state. As a tertiary backup, an electronic tape is created nightly and the year-end tape is securely stored offsite at our DR site.

Financial and Operational Assessments

Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD 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. In addition, we will retrieve our key activity records as described in the section above.

Financial and Credit Risk

In the event of an SBD, 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 of order taking and entry. Our clearing firm 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.

Our clearing firm 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.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm 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. Our clearing firm 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.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure - particularly telecommunications - can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

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 to the rep. During an SBD, either internal or external, 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 website.

Order Entry

Currently, our firm enters orders by recording them on paper and sending them to our clearing firm electronically or telephonically. Our firm uses an express mail system to process paper applications and checks are scanned to the clearing firm.

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 the order to the clearing firm by the fastest means available when it resumes operations.

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 communicate with our customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in-person visits at our firm or at the customer's location. 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 other party.

Employees - We now communicate with our employees using the telephone, e-mail, text 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 employees 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 Michael C. Bremer, 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 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 FINRA.

Critical Business Constituents, Banks, and Counter-Parties

Business constituents - We have contacted our critical business constituents (businesses 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 Bank, Route 46, Little Falls/West Paterson, NJ 07424 Phone (973) 890-1500.

Regulatory Reporting

Our firm is subject to regulation by 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 to us 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 coordinator is Elana Domasica, District 9, 581 Main Street, Suite 710, Woodbridge, NJ 07095-1164, (732) 596-2055, and Fax (732) 596-2003.

Disclosure of Business Continuity Plan

We disclose in writing a summary of our BCP to customers at account opening. We also post the summary on our Web site www.summitequities.com, and mail it to customers upon request

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, the firm will review this BCP 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: _Chief Operating Officer _____

*Date: _____

*Electronic Signature is not available. See Compliance Department for a copy of signed BCP plan and approval.