

EXHIBIT IV – BCP Summary Plan Disclosure

Business Continuity Plan Disclosure Statement

Overview

Tuohy Brothers (“the Firm”) has created and implemented a business continuity plan (“BCP”) in an effort to mitigate the effects related to unforeseen business interruptions. This BCP is designed to enable the Firm to continue or resume its business operations in the event of an emergency or significant business disruption (“SBD”).

Communications and locations of Employees during a disruption

In the event of a SBD, Tuohy Brothers will communicate with its employees in several different ways. The Firm will employ a calling tree, which would be implemented by management in the event of an SBD. The BCP also addresses the relocation of staff to alternative back-up locations in New York and the surrounding area. Recovery time for most of the applications involved in the Firm’s advisory services and relocation to alternate locations is expected to range from immediate to 24 hours.

Communications with Customers

The Firm currently communicates with its clients using the telephone, email, fax, US Mail, and in person. In the event of an SBD, the Firm will assess which means of communication are still available and use the means closest in speed to the means used in the past.

Books & Records

Tuohy Brothers maintains its hard-copy books and records and electronic records primarily at its Main Office. If records are lost as the result of a business disruption or for any other reason, the Firm has the means to physically recover data from electronic back-up locations.

Vendors and Counterparties

The Firm’s BCP may need to rely upon the recovery and restoration of services provided by various critical business constituents both at its primary and alternate locations. Tuohy Brothers has considered the extent to which the Firm may be able to depend upon these business relationships during an SBD as a part of its decision to do business with the constituents. Where possible the Firm has engaged and/or vetted alternate arrangements in order to avoid business disruptions in the case of a business constituent not being able to provide needed goods or services in an emergency.

Disclosure

The Firm’s BCP is designed to address the continued operation of the Firm in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and the Firm cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, Tuohy Brothers has no control over and must rely upon the disaster recovery plans of its various critical business constituents and vendors. In the event that material changes are made to this BCP, the Firm will send an updated copy to all of its clients.

The information contained in this disclosure is provided by Tuohy Brothers for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and Tuohy Brothers.