

Dear Client:

The Gramm-Leach Bliley Act of 1999 requires that we send this notice to you.

CIMCO (hereinafter referred to as the "Adviser") provides a variety of investment advisory and financial planning service to clients who have contracted for these services. As a result, the Adviser is required to communicate its policies related to the privacy of customer information. We are proud of our privacy protection practices and procedures and we want you to know how we protect your information and use this information to service your account. Please take a moment to review our privacy policy as described below:

In order to facilitate the servicing of your account, the Adviser may receive nonpublic personal information about you from the following sources:

- Information we receive from you on questionnaires, applications, and account opening documents or other forms;
- Information about your transactions with us or others;
- Information we receive from a consumer reporting agency; and
- Information we received from other sources with your consent.

We do not disclose any nonpublic personal information about you to anyone except as permitted by law. Such disclosure may include the following:

- Disclosures to affiliates, including affiliated service providers (for example, insurance agencies for processing of variable insurance application on your behalf);
- Disclosures to your chosen broker-dealer firm (for example, to establish a brokerage account on your behalf);
- Disclosures to government agencies, securities regulators and law enforcement officials (for example, for tax reporting, under a court order or to protect our legal rights);
- Disclosures to other organizations, with your consent (for example, other investment adviser firms in order to open a managed account with their firms or the brokerage firm they utilize; and
- Disclosures to other persons you authorize to obtain such information (for example, a CPA who will be preparing your tax return).

The Adviser restricts access to your personal and account information to those of its employees who need to know that information to provide products or services to you. The Adviser maintains physical, electronic, and procedural safeguards to guard your nonpublic personal information.

We will continue to adhere to the privacy policies and practices as described in this notice if you decide to close your account(s) or become an inactive customer.

If you have any questions concerning the Adviser's privacy policies and procedures, please feel free to contact us. Thank you.

Robert L. Colomb, Sr.
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