

BUSINESS CONTINUITY AND DISASTER PLAN

FLEMING WATSON FINANCIAL ADVISORS, LLC

Continued business operations are critical for Fleming Watson Financial Advisors, LLC. We will attain continued business operations by following our Business Continuity and Disaster Plan as follows:

Emergency Contact Persons

Our firm's two emergency contact persons are: Neal Watson, (740) 373-8795, neal@flemingwatson.com and Jim Watson, (740) 350-1628, jim@flemingwatson.com. These names will be updated in the event of a material change, and our Executive Representative will review them 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.

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 fire in our building, death or incapacitation of principal. In the event Mr. Neal Watson becomes incapacitated or upon his death, Jim Watson will notify all critical business constituents as well as all regulators who have jurisdiction over the business of FLEMING WATSON FINANCIAL ADVISORS, LLC and the clients of FLEMING WATSON FINANCIAL ADVISORS, LLC. 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.

Approval and Execution Authority

Neal Watson, Chief Compliance Officer, is responsible for approving the plan and for conducting the required annual review. Neal Watson has the authority to execute this BCP.

Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual review, and the changes that have been made to it for inspection. An electronic copy of our plan is located in a secure location.

Business Description

Our firm conducts business in financial planning, and managing equity and fixed income portfolios. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them, and delivers funds and securities. We do not engage in any private placements.

Office Locations

Our Firm's main office is located at 512 Third Street, Marietta, OH 45750. Its main telephone number is 740-373-4877.

Alternate Physical Location

In the event of an SBD, we will move business operations to 616 McKenna Drive, Williamstown, WV. Its main telephone number is (740) 373-8795.

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. TD Ameritrade is our Custodian. In the event of an internal or external SBD, if telephone service is available, customers may access their funds and securities by contacting Customer Service at (800) 431-3500 of TD Ameritrade. The firm will make this information available to customers through its disclosure policy.

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

Our firm maintains its primary electronic and hard copy books and records at 512 Third Street, Marietta, OH 45750. The firm backs up its electronic records daily onto a hard drive, and then every Monday it is taken to the residence of the CCO.

In the event of an internal or external SBD that causes the loss of our records, we will recover them from our electronic back up.

Financial Operational Assessments

Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, critical banks, critical counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our telephone voice mail, and secure e-mail. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

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, 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.

Alternate Communications Between the Firm and Customers, Employees, and Regulators

Customers

We now communicate with our customers using the telephone, e-mail, our Web site, fax, U.S. mail. 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 (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

Employees

We now communicate with our employees using the telephone, e-mail, 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 (written and oral) to the means that we have used in the past to communicate with the other party.

Critical Business Constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), 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. Our major suppliers are:

TD Ameritrade:

City: San Diego State: CA
Phone: (800) 431-3500
Contact Name: Customer Service
Materials/Service Provided: Custodian of Client Accounts

Grendel/Big Brain Works:

Phone: (888) 824-4477
Contact Name: George Gudotti
Materials/Service Provided: Contact Management Data

Concentric Technologies

City: Marietta State: OH
Phone: (740) 376-0353
Contact: Ray Page
Materials/Service Provided: IT Consulting

Morningstar-dbCams

City: Oakland State: MD
Phone: (301) 334-1800
Contact Name: Technical Support (option 1)
Materials/Service Provided: Portfolio Database Software

Settlers Bank

City: Marietta State: OH
Phone: Materials/Service Provided: Banking

Regulatory Reporting

Our firm is subject to regulation by Ohio state regulators. We now file reports with our regulators 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 (written or oral) 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.

Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure 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, our 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.

ACKNOWLEDGEMENT OF PLAN REVIEW

BUSINESS CONTINUITY AND DISASTER PLAN

Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Signed: _____

Title: _____

Date: _____

Employee Acknowledgement

I have received and understand this Business Continuity Plan.

Signed: _____

Title: _____

Date: _____

Signed: _____

Title: _____

Date: _____

Signed: _____

Title: _____

Date: _____

Signed: _____

Title: _____

Date: _____