

June 5, 2015

REGISTERED
INVESTMENT
ADVISOR

LOS ANGELES

NEW YORK

BOSTON

William O'Neil + Company ("the Firm") has established a sound business continuity plan ("BCP"). This plan incorporates multiple recovery strategies for each of our core lines of business. We regularly test our recovery strategies in order to maintain their optimal reliability and effectiveness. In the event of an unexpected disaster or emergency, every attempt will be made to restore and maintain normal service levels as soon as possible. In addition, a toll free emergency response telephone number, 866.308.2911, provides you with up to date information on our Firm's status in emergency or disaster situations. Check our Web site at www.williamoneil.com for ongoing updates regarding our BC planning.

The intent of our BCP is to protect the integrity of our business operations should we face a significant business disruption to our main office location. The Firm has a BC Response Team consisting of business and technology personnel to manage the recovery and continuity process.

Although components of our business resumption plan may vary based on the nature of each specific event, we have identified three types of interruptions that could affect our normal business operations:

- **Systems interruptions.** To minimize the severity of systems interruptions, the Firm has long instituted redundancies for our critical business systems. Our network infrastructure has been designed to be highly fault tolerant. In the event that a system experiences a temporary outage, the applications are automatically transferred to the redundant component with minimal impact to your service.
- **Operations facility interruptions.** If there is a disaster at our primary office location, we will make every effort to update our toll free number and Web site with the current status of our business operations
- **Telecommunication interruptions.** The Firm utilizes multiple telecommunications companies to create a redundant voice and data network, thereby minimizing the likelihood of a communications outage. Should an outage occur, we would take reasonable action to implement alternatives to allow you to receive information in a timely manner.

Please review the disclosure matrix that summarizes our plan to respond to future SBD of varying scope. In addressing these events our summary (1) provides specific scenarios of varying severity; (2) states whether we plan to continue business during that scenario and, if so, our planned recovery time; and (3) provides general information on our intended response. The Firm has established an alternative physical location outside of our local region if the effects of a SBD make it necessary to continue business from a location away from our current location.

We appreciate your business, and look forward to maintaining a long-term relationship with you and your company. If you have any questions relating to these matters, please send an email to bcpinfo@williamoneil.com.

Sincerely,



Steven L. Birch
President & Chief Operating Officer