

**WORDEN CAPITAL MANAGEMENT LLC
BUSINESS CONTINUITY PLAN
SUMMARY DISCLOSURE STATEMENT**

Worden Capital Management LLC (“WCM”), pursuant to Financial Industry Regulatory Authority, Inc. (“FINRA”) rules, has created a Business Continuity Plan, to address and guide our response to and recovery from Significant Business Disruptions (“SBDs”). Copies of this Summary Disclosure Statement shall be given to all clients at the time they open their accounts with WCM. WCM’s Business Continuity Plan is subject to modification and an updated summary will be sent to our clients annually. Alternatively, clients may obtain updated summaries by requesting a written copy by mail or fax.

In all of the following scenarios, WCM plans to continue business and our planned recovery time, depending upon the time of occurrence, should not exceed 24 hours from the time of the declaration of the SBD. Staff, telephone calls, and e-mails will return to their original location upon full restoration of service.

Disruption to a single building or our Firm’s main or branch offices

If a disruption occurs at our main office located at 100 Ring Road, Suite 210, Garden City, NY 11530 or our branch offices located at 1427 Military Cutoff Rd., Suite 206, Wilmington, NC 28403 and 1001 West Glen Oaks Lane, #223, Mequon, WI 53092, we will work from the nearest suitable, reasonably available office location, or allow staff to work from home offices.

Disruption to a business district

If a disruption occurs in our business district affecting our main or branch offices, we will work from the nearest suitable, reasonably available office location, or allow staff to work from home offices. These locations shall be outside the business district.

City-wide business disruption

If a disruption occurs in our city-wide area that affects our main or branch offices, we will work from the nearest suitable, reasonably available office location, or allow staff to work from home offices. These locations shall be outside the city-wide area.

Regional disruption

If a regional disruption occurs that affects our main or branch offices, we will work from the nearest suitable, reasonably available office location, or allow staff to work from home offices.

WCM has also contracted with various entities to insure that sensitive information is made redundant at back-up facilities. However, due to the nature of such information we do not disclose the specific location of any back-up facilities, any proprietary information contained in our Business Continuity Plan or the parties with whom we have back-up arrangements.

Please call us should you have any questions at (516) 439-4192.

Thank you.

Jamie Worden
Chief Executive Officer.