

SUBJECT: transfer of agent/Broker Dealer of record.

The NASD does not permit block transfers of business anymore. Because of this we must be careful to transfer all accounts on an individual basis. Following are our agent, Broker/Dealer of record transfer instructions.

If the account is a non-networked account(the account has an account number issued right from the mutual fund), all that is necessary is to fill out one of our account transfer forms and a new account/suitability form. Please make sure the client or clients in the case of a joint account, have signed exactly as the account is registered. Once we receive the paper work we will sign off and send to the appropriate fund. Make sure you do a form for each fund family seperately. It also helps if you send a copy of a client statement. If you are doing a corporate plan usually a signed request by an authorized signer on corporate letter head will work fine to transfer all accounts in the plan.

NETWORKED or STREET NAME ACCOUNTS

Occasionally you will find customers who have networked or street name accounts they wish transferred. You can distinguish these accounts from non networked accounts as follows:

- 1) these accounts have an account number that is issued by the carrying firm and not the mutual fund.
- 2) Often times several different mutual fund families are represented on the client statement under one master account number.
- 3) Client statements come from some other organization other than the mutual fund company itself.

Networked accounts are accounts that are not set up directly through the fund. AS such they require special handling to transfer to you . Following are the steps to change networked accounts to you.

- 1) IRA and other qualified networked accounts.

Fill out the fund companies IRA or other qualified application. This will open an account at the fund. Along with this application also fill out a transfer of asset form from the fund marking the transfer as `assets in kind`. The shares will be sent from the networked account back to the fund and a statement will be issued directly from the fund now showing you as broker. Send everything to us so we can walk it through the system.

2) NON QUALIFIED ACCOUNTS

Fillout the fund companies regular account application. Be careful to have the names the same as on the networked account you wish to transfer to you. Have your client write a note telling their networked account manager (Pershing, Mesirow etc.) to send their shares in kind back to the fund. Once we receive the paperwork we contact the fund to open a shell account to receive the shares. Once done we will send the account number along with the client note to the network company. We will follow through the system.

Networked accounts are not hard to de-network as long as you follow our above system. If our directions are not followed you will find it next to impossible to get networked accounts transferred into your name for servicing. Remember: Networked accounts are not set up at the fund. That is why we have to open an account at the fund to receive the shares. Your client will now receive statements directly from the fund company. They will also start to receive other fund company information that the network carrier probably did not send to them. You will find that this information sent from the funds will help you in maintaining and servicing your accounts better. Regardless of the account type, please send us a copy of the existing statement and one of our new account/suitability forms. Do not send anything in direct to transfer you as broker of record. We must sign off on all forms from the Broker/Dealer.