

Business Continuity Plan Disclosure

As required by recent securities industry regulations, we want to make you aware that we have developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – In the event of a business disruption Hamilton Clark & Co. will provide information to its employees and clients via e-mail, and/or other telecommunication services. If you cannot access us through those means, you may contact John J. McKenna, our CEO at (office) 703-288-5277, (cell) (703-405-0881, or (home) (202) 686-6994. Alternatively you may contact Ross F. Crawford in our Houston office at (office) (713) 658-8080, (cell) (713) 203-1902, or (home) (713) 522-8875.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses among other things: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our clients of access to Managing Directors if we are unable to continue our business.

Hamilton Clark & Co. backs up our records using two redundant back-up systems. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our back-up firms that its objective is to restore our operations within about 24 hours.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. Our plan addresses various disruptions and is intended to mitigate reasonable risk so as to permit the continuation of key business operations. We maintain back-up facilities away from our primary facility so that it would not be affected by a regional disruption. This facility is equipped to sustain critical operations until we can return to our regular facility or occupy a new one. The firm’s goal is to recover its critical business processes with minimal interruption, within minutes or hours after the significant business disruption, depending

on the nature of the disruption. These recovery objectives may be affected by the availability of other financial market participants and critical infrastructures (e.g. exchanges, clearing systems, public utilities) and circumstances beyond our control. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our clients of a way to continue working on their transactions.

Plan Updates – Hamilton Clark & Co. will review, test and update the plan, as necessary, and as conditions in our firm and the industry change. An updated summary disclosure will be promptly posted on our web site (www.hamiltonclark.com) . Clients may alternatively request a copy of the disclosure by writing to:

Hamilton Clark & Co.
Attention: John J. McKenna
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McLean, VA 22102