

Capital Consulting & Asset Management

How We Use And Protect Personal Information At Capital Consulting & Asset Management

At Capital Consulting & Asset Management (CCAM), protecting your privacy is very important to us. We value your trust and we want you to understand what information we collect, how we protect it and how we use it. We treat personal information – nonpublic information that identifies you – with respect, and in accordance with this Privacy Policy.

Information We May Collect

We may obtain information, much of which comes directly from you, to provide you with products and services you have requested and as we deem appropriate, to determine your eligibility for products or services. We may collect identification and contact information, as well as transaction and investment experience information from applications, transactions with others and us, and from outside companies. Examples of the sources and types of information we may collect include:

- Information about the products and services you purchase through us, including copies of applications, registration forms, or other forms, containing your name, address, telephone number, e-mail address, investment objectives, income assets, employment information and accounts with others;
- Information regarding your brokerage and/or investment advisory transaction history with us, our service providers, such as clearing firms, or other companies; and
- Information that other companies who assist us in marketing our own products and services or products we offer jointly with other financial institutions may have, such as your name, address, and telephone number.

Information We May Disclose And To Whom We May Disclose Information

CCAM does not disclose your personal information to companies or organizations not affiliated with us that would use the information we have provided them to contact you about their own products and services.

We may disclose all the personal information we collect, as described above, to companies, such as insurance companies and brokers, banks, broker/dealers and investment advisors that provide services to you on our behalf, in the following types of situations. They are:

- Providing administrative, customer assistance, clearing, operational, or other services;
- Preparing, printing and delivering portfolio management performance reports, confirmation statements and other documents;
- Executing securities transactions;
- Maintaining or developing software for us; and
- A financial institution (such as banks, investment advisors or securities firms) with which we have joint marketing arrangements to jointly endorse or offer financial products or services.

Disclosures Permitted By Law

We may also disclose all the information we collect as permitted or required by law. For example, we may disclose information to law enforcement agencies or insurance and securities regulatory agencies.

Instructions on How to Notify Us

For any questions regarding this policy, please contact Capital Consulting & Asset Management directly at 888-818-CCAM (2226) toll free.

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410 The Apothecary
Lincoln, NE 68508



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CCAM

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The following is a letter that was sent out by Capital Consulting during third quarter of 2008. You may have already received a copy, however, in the face of recent news we thought we would provide it to you again.

In light of some recent financial news, you may have questions about where your assets are custodied. We have chosen to custody your assets with Fidelity, due not only to their solid reputation in the financial industry but also for the steps they've taken to help protect your assets.

Fidelity Investments is one of the world's largest providers of financial services, with custodied assets of \$3.3 trillion, including managed assets of \$1.6 trillion as of February 29, 2008. Fidelity offers investment management, retirement planning, brokerage, and human resources and benefits outsourcing services to more than 24 million individuals and institutions as well as through 5,500 financial intermediary firms. The firm is the largest mutual fund company in the United States, the No. 1 provider of workplace retirement savings plans, the largest mutual fund supermarket and a leading online brokerage firm.

Fidelity makes protecting client assets a top business priority. They have a comprehensive system of internal controls (including, risk management, compliance and internal audit functions) and processes and procedures to help ensure compliance with the rules and regulations of the external regulatory agencies that oversee brokerage businesses.

Asset Protection

Brokerage accounts maintained with Fidelity, such as yours, are protected by SIPC which protects brokerage accounts of each customer up to \$500,000 in securities, including a limit of \$100,000 on claims for cash awaiting reinvestment. Money market funds held in a brokerage account are considered securities.

In addition to SIPC protection, Fidelity provides additional coverage, which offers asset protection for total net equity (cash and securities) in an account. This supplemental coverage, called "excess SIPC coverage", is not subject to a dollar limitation for any one account or for the firm. For more information about Fidelity's excess SIPC coverage, visit www.capcoexcess.com.

This coverage is limited to securities held in brokerage positions, including mutual funds if held in brokerage accounts and securities held in book entry form. Please remember that neither SIPC nor the additional coverage protects against loss of market value of the securities. In addition to the government-sponsored and privately-managed asset protection, the Securities and Exchange Commission customer-protection rule (SEC Rule 15c3-3), requires broker dealers to hold client assets in a "segregated account" — firms cannot use these assets for their own business purposes.

In accordance with this rule, Fidelity protects brokerage client securities that are fully paid for by segregating them and ensuring that they are not used for any other purpose, such as for loans to investors or institutions. This practice helps customers have access to these securities at all times. We have also included a copy of our privacy policy for your review.

We thank you for having the confidence in Capital Consulting to entrust us with your assets. Please do not hesitate to contact us if you have questions.

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