

**CL King & Associates, Inc./Paradigm Capital Management, Inc. /Paradigm Funds Advisor LLC/Paradigm Growth Advisors Inc.
Business Continuity Plan**

This document addresses the business continuity plan employed by CL King & Associates, Paradigm Capital Management, Paradigm Funds Advisor LLC and Paradigm Growth Advisors Inc. (collectively the “Firm”). The purpose of the plan is to ensure the uninterrupted operations of the Firm’s business and/or restoration of the Firm’s operations in the most efficient and timely manner in case of a significant business disruption. The plan is designed to address the following key areas:

- Financial and operational requirements.
- Alternate physical location of employees.
- Critical business constituent, bank and counter-party impact.
- Communications with customers, employees and regulators.
- Data back-up and recovery.
- Mission critical systems.
- Regulatory reporting.
- Assuring customers prompt access to funds and securities in the event the Firm is not able to continue in business.

The business continuity plan is tested at least annually and is continuously reviewed in light of changes in the Firm’s business, operational, IT, financial and physical environment.

A disruption can be caused by any accidental, natural or man-made event which threatens to or does disrupt normal operations for sufficient time to significantly affect the Firm’s ability to continue business. The scope of a disruption can be local, affecting the main or branch offices or a major application system, or regional or industry-wide, affecting the securities markets in part or as a whole. The Firm’s response to a disruption will depend upon the scope and estimated timeframe.

Our Firm’s policy is to respond to a significant business disruption by safeguarding employee’s and Firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the Firm’s books and records, and allowing our customers to transact business.

We maintain a copy of our business continuity plan at our external storage facility and an electronic copy at our external backup facility.

Emergency Contact Persons

Candace King Weir, President

Peter Bulger, CL King COO and Compliance

Charles DiVencenzo, Paradigm COO

Robert Benton, CFO

Scott Clemens, IT

Tom Hallisey, Operations

Peter McMillen, Facilities

Offices Locations

- Main Office: 9 Elk Street, Albany, NY 12207; ph 518-431-3500; fax 518-431-3550. Primary contacts Peter Bulger 518-431-3535, Robert Benton 518-431-3258.
- Branch Office: 80 State Street, Albany NY 12207; ph 518-447-8050; fax 518-207-2799. Primary contact Chris Edwards 518-447-8050.
- Branch Office: 410 Park Avenue, Suite 1620, New York, NY 10022; ph 212-421-3242; fax 212-421-3284. Primary contact Dorothy Frey 212-572-3658.
- Branch Office: 551 Madison Avenue, 8th Floor, New York, NY 10022; ph 212-421-3242; fax 212-421-3284. Primary contact Vincent J. Kenney 212-421-6873.
- Branch Office: One Liberty Square 5th floor, Boston, MA 02109; ph 617-357-5509; fax 617-357-7301; primary contact Bill Kremer 617-357-5068.
- Data Center/Colocation: 11 North Pearl 8th Floor, Albany, NY 12207. Primary contact Robert Daggett 581-694-0552

Alternative Physical Location(s) of Employees

In the event of a significant business disruption we will continue operation at an alternate working location. Alternate locations include our backup data center in our office at 9 Elk Street, Albany, NY and our disaster recovery site in our office at 80 State Street, Albany NY and operating offices.

Critical Business Constituent, Bank and Counter-Party Impact

Contact information for all of our critical business partners, banks and counter-parties are listed in the business continuity plan. In the event of a significant business disruption we will use the means closest in speed and form to the means that we have used in the past to communicate with parties. We will always keep all parties informed with status on the situation of the business.

All of those parties maintain business continuity plans of their own in the event of a significant disruption to their businesses.

Communications with Customers, Employees and Regulators

In the event of a significant business disruption we will use the means closest in speed and form to the means that we have used in the past to communicate with our customers, employees and regulators. We will always keep all parties informed with status on the situation of the business.

Data Back-Up and Recovery (Hard Copy and Electronic)

Our Firm maintains a copy of all relevant documents in our offsite storage facility – Iron Mountain, Kingston NY. On a daily basis we backup to our backup data center all electronic files. On a monthly basis we backup all electronic files to our offsite storage facility. We have access to those records and files at any given time, so in the event of a significant business disruption we can always recover our records.

Mission Critical Systems

Our Firm's mission critical systems are those that ensure prompt and accurate processing of securities transactions and the maintenance of customer accounts. Those systems are backed-up at the end of the day to removable hard drives. Operationally ready servers located at our 9 Elk Street facility are available to restore mission critical systems once an emergency is declared. Redundancy for certain trading systems is provided by locating them at multiple branch locations.