Disaster Recovery Plan

Policy

As part of its fiduciary duty to its clients and as a matter of best business practices, Weaver C. Barksdale & Associates, Inc. ("WCB"), has adopted policies and procedures for disaster recovery and for continuing WCB's business in the event of a disaster. These policies are designed to allow WCB to resume providing service to its clients in as short a period of time as possible. These policies are, to the extent practicable, designed to address those specific types of disasters that WCB might reasonably face given its business and location.

There are a number of events such as severe weather, acts of war, terrorist activities, personal accidents and the like that could hamper our efforts to provide appropriate service to our clients. The nature of the specific cause is less important than the specific impact in terms of the loss of key personnel, communications, data, and use of our office space. The purpose of this policy is to establish procedures to limit the impact of such developments on our ability to serve our clients.

Background

Since the terrorist activities of 9/11/2001, all advisory firms need to establish written disaster recovery and business continuity plans for the firm's business. This will allow advisers to meet their responsibilities to clients as a fiduciary in managing client assets, among other things. It also allows a firm to meet its regulatory requirements in the event of any kind of disaster, such as a bombing, fire, flood, earthquake, power failure or any other event that may disable the firm or prevent access to our office(s).

Responsibility

The Operations' Manager along with the Chief Compliance Officer is responsible for maintaining and implementing WCB's Disaster Recovery and Business Continuity Plan.

Procedure

WCB has adopted various procedures to implement the firm's policy and reviews to monitor and ensure the firm's policy is observed, implemented properly and amended or updated, as appropriate, which may be summarized as follows:

In the event of an accident or illness that would prevent one or more key employees from performing their duties, it is critical that each key employee have a backup who would be able to perform those duties. Following is a list of primary and secondary backup assignments. It is the responsibility of the key employees as well as each employee in a backup role to prepare for the backup to assume the duties of the key person.

Key Personnel

Position	Backup	Secondary
CEO – McDowell	Barksdale	Slocum
CIO – Webb	Puryear	Cox
Compliance Officer – Slocum	Carpenter, T	McDowell
Operations Manager – Carpenter, T.	Carpenter, K.	Chamnanphong

Communications

All staff members have been provided with Exhibit V - A, which shows the home and cell numbers as well as home email addresses for all personnel. All key personnel have access to a cell phone.

In the event of loss of communication (i.e., loss of internet service and/or telephone service), it will be the responsibility of the Disaster Recovery Coordinators ("DRC") to contact our service provider regarding restoration of service. The current telephone service provider, Deltacom, has the capability to employ "Remote Call Forwarding" to any location specified. Key personnel will attempt to use their home computers.

In the event of a disaster, all personnel will meet at the residence of Tim and Kathy Carpenter at for further instructions. Map is attached in Exhibit V - C. Exhibit V - A includes a list of employees who have computers at home that could be employed if service is available to them. Additional laptop computers will be employed as necessary. The Operations Manager will be responsible for acquiring internet services through a local internet service provider. The critical investment systems will be maintained and updated on a laptop PC at the Operations Manager's home location. These systems include but are not limited to Bloomberg, Bondedge, Sungard, and DTC Tradesuite These systems are available to be updated via the internet. In the event that home computers cannot be used, the DRC will direct key personnel to the nearest hotel that has available communications (see Exhibit V - B).

When communications have been restored, the operations manager will be responsible for ensuring that all clients, custodians, brokerage firms and critical service providers have been properly advised how to contact us.

Data Retention

Critical data files (i.e. EXCEL, Word, etc.) on office computers are backed up daily and stored off-site. Less critical data will be backed up weekly or quarterly at the determination of the Operations Manager and stored off-site. Books and records required for regulatory purposes are being transferred to electronic media with redundant copies stored at an off-site location. Removable disk drives are stored at two different locations: (The Barksdale home safe and one at the Carpenter's).

Office Space

In the event that our office space becomes uninhabitable, all personnel will meet at the residence of Tim and Kathy Carpenter at for further instructions. Map is attached in Exhibit V- C.

Eakin Properties, with whom we have our lease, has agreed to provide us with temporary space at a location somewhere within the cities of Nashville, Brentwood or Franklin. This space is based on availability within their system. If said space is not immediately available, key personnel will employ temporary quarters in their homes or an appropriate hotel listed in the accompanying Exhibit V- B. The DRC will be responsible for seeing to it that communications services are provided to the new location(s) as described under "Communications". The DRC will also coordinate the retrieval of all backup tapes and contact the Post Office regarding mail collection.

Other Information

Disaster Recovery Coordinators: Tim Carpenter and Debbie Slocum
Operations Manager:...Tim Carpenter
Eakin Properties.....Nikki Carroll – 615-250-1800
ITC Deltacom:.....800-239-3000
IKON: .....Monique Valdez: 615-770-3223 or 888-456-6457
Security Archives:.....Jason Milek: 615-331-3897
SunGard: .....Ed Shields 973-339-2410
Bloomberg: .....Michael Kevitch: 212-617-6703
BondEdge (CMS): .....John Binder: 212-771-6771
DTC Tradesuite.....Client Contact Center: 617-664-3625

WCBA EMERGENCY ALTERNATIVE LOCATIONS

Initially go to Tim and Kathy Carpenter's home at
(Map Exhibit V-C is attached)

Name	Address	Phone
1. Hilton Suites (Maryland Farms)	900 Overlook Drive Brentwood, TN 37027	615-373-0212
2. Nashville Marriott (Northeast Area)	600 Marriott Drive Nashville, TN 37214	615-889-9300
3. Doubletree Hotel (Downtown)	315 Fourth Avenue North Nashville, TN 37219	615-244-8200
4. Gaylord Hotel (Northeast Area)	2800 Opryland Drive Nashville, TN 37214	615-889-1000
5. Embassy Suites (Cool Springs)	820 Crescent Centre Drive Franklin, TN 37067	615-871-0033