

FULLEN FINANCIAL GROUP, INC.

Privacy Policy

This Privacy Policy ("Policy") is provided to help you understand how we protect your financial privacy, just as we seek to protect your financial interests and assets. We are committed to safeguarding the use of your personal information that we have as your investment adviser.

Information Covered by this Policy

Our Policy applies to all personally identifiable financial information about you that Fullen Financial Group, Inc. obtains in connection with providing our services ("personal information"). Our Policy will continue to cover information we may collect about you during the course of our relationship as well as after the relationship has ended.

Why and How We Collect Personal Information

In order to understand and meet your needs and to fulfill legal and regulatory requirements, we collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications, other forms, or in other ways when you visit us in person or communicate with us over the telephone, through the mail or through e-mail or our website;
- Information we receive from or about your transactions with us, our affiliates, or the custodian or broker for your assets, or
- Information we receive from other sources in connection with providing financial services to you.

Such nonpublic personal information may include, but is not limited to, your name, address, social security number, income, net worth, account balances and transactions.

Disclosure of Information Collected

Fullen Financial Group, Inc. does not disclose such information to others and only uses it in order to provide you with services and to effect transactions that you request or authorize. We may release information we have about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances (for example to protect your account from fraud). We do not sell your nonpublic personal information about you to anyone.

How We Secure Personal Information

We restrict access to nonpublic personal information about you to those employees and agents who need to know the information in order to provide services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your personal information.

Further Information

This notice is being furnished on behalf of Fullen Financial Group, Inc., an Investment Adviser registered with the State of Ohio Division of Securities. For questions or concerns about this Policy or if you have an account managed by Fullen Financial Group, Inc. and you would like a copy of our Form ADV, Part II, please contact us at Fullen Financial Group, Inc., 200 E. Campus View Blvd., Suite 200, Columbus, OH 43235.

Fullen Financial Group, Inc. reserves the right to modify or amend this policy at any time; provided, however, that we will promptly notify you of any such modifications or amendments.

Date: May 9, 2005