



Anchor Bay Capital, Inc.

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Firm Brochure

March 29, 2011

This brochure provides information about the qualifications and business practices of Anchor Bay Capital, Inc. ("ABC"). If you have any questions about the contents of this brochure, please contact us at (760) 602-3470 or email brian@anchorbaycapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Currently, ABC's Brochure may be requested by contacting Brian Johnson, Chief Compliance Officer at (760) 602-3470, or brian@anchorbaycapital.com. ABC's Brochure is also available on their web site www.anchorbaycapital.com also free of charge. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Anchor Bay Capital, Inc. is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with ABC who are registered, or are required to be registered, as investment adviser representatives of ABC. You can search this site by a unique identifying number, known as a CRD number. The CRD number for ABC is 116913.

Registration as an investment adviser does not imply a certain level of skill or training.

Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that ABC must provide to clients as required by SEC Rules. This Brochure dated March 29, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that their previous Brochure did not require, which was dated December 15, 2011. ABC will disclose only material changes since the last annual update of their Brochure on this cover page.

ABC believes the following information represents material change to their former Brochure:

1. ABC has converted their Brochure language to a “plain English” format to make their disclosure information more comprehensive, as required by new regulation.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. ABC will also reference the date of their last annual update of their Brochure.

In the past ABC has offered or delivered information about their qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, ABC will ensure that clients receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of their business’ fiscal year ABC may further provide other ongoing disclosure information about material changes as necessary.

ABC will further provide clients with a new Brochure as necessary based on changes or new information, at any time, without charge.

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Advisory Business

Anchor Bay Capital, Inc. (“ABC”) provides discretionary investment management services to individual investors and company retirement plans.

Anchor Bay Capital, Inc. was incorporated in 2007 and is a successor to Anchor Bay Capital Management, LLC (formed in 2001), itself a successor to Spiering Investment Management, LLC, formed in 1992.

The firm’s founder and principal owner is Scott Spiering.

Investment Advisory Services

Investment Advisory Services offered by ABC include Investment Management Services, Financial Planning Services and Wealth Management Services.

Investment Management Services

ABC offers Investment Management Services (“IMS”) to individual investors and company retirement plans. As a discretionary asset manager, ABC implements its Investment Management Services by buying and selling stocks, bonds, mutual funds, Exchange-Traded Funds (“ETFs”) and other investment securities in client accounts maintained at Fidelity Investments or other custodians selected by clients.

Anchor Bay Capital, Inc. manages IMS accounts using asset allocation portfolios. Each portfolio is designed to offer a specific risk/return profile in order to match a client’s risk/return objectives to an appropriate investment portfolio. ABC offers five Core portfolios: Fixed Income, Low Risk, Conservative, Balanced and Growth. ABC also offers Mutual Fund and ETF portfolios to 401(k) plans and as a substitute for its Core portfolios in smaller accounts (less than \$100,000) in order to eliminate the cost of trading, which ABC has determined is detrimental to smaller accounts. ABC constructs the portfolios by combining stocks, bonds and other securities that pass its selection criteria into an asset allocation portfolio, with a percent allocated to fixed income (increasing for lower risk portfolios) and equities (increasing for more aggressive portfolios). To determine which securities meet its selection criteria, ABC conducts independent research (due diligence) to determine which stocks, bonds and other investment securities meet its criteria and in ABC’s opinion offer the best risk/reward in isolation and as part of a diversified investment portfolio. ABC’s due diligence process and investment selection criteria may vary depending on market conditions.

Financial Planning Services

Financial Planning Services include the preparation and presentation of a Financial Plan that projects future cash flow based on assumptions about growth of assets, which the client can use for budgetary and estate planning. The financial plan also helps the client and ABC to determine the desired return on investments, a crucial element in the selection of an appropriate investment portfolio. The plan includes investment

recommendations that the client may choose to adopt. If the client chooses to retain ABC to implement the investment recommendations, the client becomes an Investment Management Services client. If the client decides to hire a different investment manager, or to manage the investments on his own without the involvement of ABC, the client is billed on a fee for service basis for the Financial Plan and Consultation.

Financial Planning Services are offered to Investment Advisory clients and to non Investment Advisory clients on a fee for service basis.

Wealth Management Services

ABC may provide a combination of Investment Management, Financial Planning and other financial products and services including coordination with the client's accountant. ABC may also offer life insurance and long term care insurance, and referrals to estate planning attorneys. When provided in combination, these services are termed Wealth Management Services ("WMS"). ABC investment advisor representatives, in their dual capacity as registered representatives of Anchor Bay Securities, may recommend insurance products, including life insurance, long term care insurance, including fixed and variable annuities; education savings plans, and other products and services sold on a commission basis as agents of Anchor Bay Securities. Any such recommendation results from financial goals, deficiencies, and strategies that are covered in the financial plan.

Individualized Services

To the extent the client participates in ABC Wealth Management Services, the Investment Advisory Services are custom tailored specifically to the client. For Investment Management Services clients, the client's assets are invested in a portfolio consistent with the client's risk profile, which ABC determines based on the results of the Financial Plan or the Investment Advisor Representative's consultation with the client.

Client-Imposed Restrictions

Clients may impose restrictions on the account regarding securities that may not be bought or sold. ABC will flag those assets and will maintain the asset in the account until instructed otherwise by the client.

Wrap Fee Programs

At the present time ABC does not provide portfolio management services to wrap fee programs.

Assets Under Management

As of March 28, 2011 ABC had \$88,149,808 in discretionary billable assets under management. ABC had \$504,395 in non-discretionary assets under management.

Fees and Compensation

Advisory Fees for Investment Management Services will range from 1.00% to 1.75% annually depending on the amount of assets managed and relative complexity of each client's situation. ABC will quote an exact fee percentage to each client based on both the nature and total dollar value of that account. The agreed-upon fee schedule will be stated in the client's advisory agreement.

ABC generally requires a minimum of \$1,000,000 of assets under management and a minimum fee of \$3,750 per quarter for this service. ABC may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee. The minimum fee requirement may prevent ABC from accepting particularly small accounts. Certain exceptions to the minimum account size and/or minimum fee may be made at ABC's sole discretion. Fees for accounts with a market value in excess of \$3,000,000 will be negotiated on a case-by-case basis.

Fee Payment Method

Clients will have their account directly debited, as authorized, in advance at the beginning of each calendar quarter. At the opening of the account, the management fee will be calculated and the client will be billed based upon the value of the initial assets. The calculation of quarterly fees will be based on the net account values on the last business day of the previous quarter.

Financial Planning Service Fees

Financial Planning Services clients are billed at a flat fee rate that varies depending on the plan's complexity and the time involved in preparation of the plan. Financial Planning Services fees range from \$500 to \$2,500 payable by invoice.

Additional Information Regarding Investment Management Fees

Negotiability of Fees: In certain circumstances, all fees and minimums may be negotiable. In addition, certain family members and personal acquaintances of ABC's affiliated persons may receive advisory services at a discounted rate which is not available to advisory clients generally

Additional Expenses: All fees paid to ABC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds, exchange traded funds and other investment and insurance products and services to their shareholders and customers. These fees and expenses are disclosed in each fund's prospectus and/or the service contract for the investment or insurance product or service. These fees will generally include a management fee, other fund expenses and a possible distribution fee. A client could invest in a mutual fund, exchange traded fund, or other investment or insurance product or service directly, without the services of ABC. In that case, the client would not receive the services provided by ABC which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and other investment and insurance products and

services and the fees charged by ABC to fully understand the total amount of fees to be paid by the client, and to thereby evaluate the advisory services being provided.

In addition to ABC's advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers. Such fees may include, but are not limited to, any transaction charges, wire transfer fees, fees for mailing checks for next-day delivery, and fees for electronic data feeds and reports.

Termination: Either party upon written notice to the other may terminate the client agreement. Advisory fee refunds will be prorated based on the effective termination date. Termination will become effective 30 days from the time the non-terminating party received written notice that the other party terminates.

An advisory client will have a period of five (5) business days from the date of signing the investment advisory agreement to unconditionally rescind the agreement and receive a full refund of all advisory fees. Thereafter, either party may terminate the investment advisory agreement with 30 days written notice. Upon termination, fees will be prorated to the date of termination and the unearned portion of the fee will be refunded to the client.

For California Residents: Subsection (i) of Rule 260.238, California Code of Regulations requires that all investment advisers disclose to their advisory clients that higher or lower fees for comparable services may be available from other sources.

ABC Investment Advisor Representatives who are also Registered Representatives of Anchor Bay Securities, LLC and/or licensed insurance agents or brokers may receive commissions from the sale of mutual funds, annuities and other investment or insurance products and services. These commissions are separate from Investment Advisory Fees charged by ABC. ABC does not execute trades in accounts managed on a discretionary basis through Anchor Bay Securities. Furthermore, clients are not under any obligation to engage these individuals or Anchor Bay Securities, LLC when considering implementation of advisory recommendations.

While these individuals endeavor at all times to put the interest of clients first as part of ABC's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest. The availability of a commission creates a financial incentive for an Investment Advisor Representative to recommend an investment or insurance product or service over another that does not provide a commission, even though the commission-free product or service might provide similar or superior benefit to the client. ABC requires that its Investment Adviser representatives abide by its Code of Ethics, which requires that the representative place clients interests ahead of their own. Any violation of this code may result in termination of the representative.

One way ABC guards against the possibility of a violation of its Code of Ethics is to require that Investment Management Services client portfolios be invested in one of the firm's portfolios, and by using no-load mutual funds in those portfolios, thereby

preventing any potentially inappropriate recommendation to use a load fund that would pay the representative a commission.

Clients have the option to purchase investment and/or insurance products and services that ABC recommends through other brokers or agents that are not affiliated with ABC.

Performance-Based Fees and Side By Side Management

ABC and its supervised persons do not accept performance-based fees, that is, fees based on a share of capital gains or capital appreciation of the assets of a client.

Types of Clients

ABC provides investment advisory services to individuals and retirement plans. As stated in the Fee section above, ABC generally requires a minimum of \$1,000,000 of assets under management ABC may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee. Certain exceptions to the minimum account size and/or minimum fee may be made at ABC's sole discretion.

Methods of Analysis, Investment Strategies and Risk of Loss

ABC analyzes individual stocks, bonds, mutual funds and exchange traded funds to determine whether such vehicles represent attractive investment opportunities and should be included in client portfolios. Individual stocks from all S&P sectors are used in Core Portfolios. Mutual Funds and Exchange-Traded Funds are used in Core Portfolios and Asset Allocation Portfolios offered to smaller account sizes. ABC considers a company's balance sheet, historical rate of growth of sales, earnings and EPS, dividend yield and other factors in its determination whether to include the company's stock in client portfolios. Mutual funds are selected based on investment objective, performance relative to peers and cost (expense ratio). Individual bonds are selected based on credit quality, maturity, duration (a measure of interest rate sensitivity) and yield-to-maturity. Stock portfolios are diversified across sectors, bond portfolios are diversified across issuers and the total bond portfolio is managed to a target maturity consistent with ABC's opinion on the future direction of interest rates. ABC uses (1) fundamental analysis of company financial statements; research from Standard & Poor's, Ford, Thompson/First Call, Morningstar and other independent investment research providers, and publications including the Wall Street Journal, CFA Institute Financial NewsBrief and others to stay abreast of economic and financial developments that have an impact on ABC's investment decisions.

Clients are advised that investments are not guaranteed and there is a risk of loss. The value of stocks, bonds, mutual funds, exchange traded funds, and portfolios of these investments will fluctuate, and may be worth more or less than the original investment value at the time of sale. Prices of individual stocks rise and fall based on company-

specific factors including company guidance, analyst estimates, corporate governance, earnings releases, dividend increases and reductions, news, rumors and investor sentiment. As baskets of individual stocks, the market values of equity mutual funds and ETFs will fluctuate with the overall stock market, and due to investment decisions and actions of the fund's portfolio manager. They will also be reduced by internal fees ("expense ratios"), trading costs, redemption fees and other expenses separate from ABC's Advisory fees. Mutual Fund values will also be impacted based on the fund's asset allocation and the stocks in which the fund is invested. To the degree the investments are correlated with the stock market, their market value will rise and fall with the overall stock market. Bonds, bond mutual funds, bond ETFs and other fixed income securities will rise and fall with interest rates. A rise in the overall level of interest rates causes a decline in principal value of bonds, and a decline in interest rates causes an increase in value. Additionally, individual bonds may face pricing spreads whereby, in the event of a bond sale the price offered by a dealer or other counterparty is less than the price quoted on the statement. Bonds also carry the risk of default by the issuer.

Disciplinary Information

ABC and its Investment Adviser Representatives have not been involved in legal or disciplinary events since the firm's inception.

Other Financial Industry Activities and Affiliations

ABC has a related company, Anchor Bay Securities, LLC that is a broker-dealer. Anchor Bay Securities, LLC is not used as custodian for ABC client assets. The CRD number for Anchor Bay Securities, LLC is 47360.

ABC Management Persons are dually registered as Registered Representatives of Anchor Bay Securities, LLC. In their capacity as Registered Representatives of Anchor Bay Securities, LLC, ABC Management Persons may recommend products and services to ABC clients that result in commission payments to the Management Person, in their capacity as a Registered Representative of Anchor Bay Securities, LLC. Such products and services include Variable Annuity products, Life Insurance products and company pension plans, such as 401(k), Defined Benefit and Profit Sharing plans. Commission payments are disclosed to the client in the course of signing the client agreement.

A potential conflict of interests exists when a commission-based product is sold to an Advisory client, because the Management Person has incentive (the commission) to place his own interests (getting paid) ahead of the interest of the client (a properly diversified portfolio using the best investment vehicles). ABC requires its Management Persons to abide by its Code of Ethics, which prohibits any action that would result in material conflicts of interest.

Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading

ABC has adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. ABC and its personnel owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics including: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. ABC will provide a copy of the Code of Ethics to any client or prospective client upon request.

ABC Investment Advisers and Portfolio Managers recommend securities and buy and sell securities on a discretionary basis in client accounts. ABC Investment Advisers and other employees may transact in the same securities as those bought and sold in ABC client accounts, without restriction. This may present a conflict of interest, in the event an ABC employee were to buy or sell the security for his own account before doing the transaction in a client account, if it were to result in the employee receiving better pricing (lower for a buy order, higher for a sell order) than the client. The ABC Code of Ethics and Policies and Procedures Manual require employees to place client interests ahead of their own.

Brokerage Practices

ABC will arrange for the execution of securities transactions for the client's account through brokers or dealers that ABC reasonably believes will provide best execution. In selecting a broker or dealer, ABC may consider, among other things, the broker or dealer's execution capabilities, reputation and access to the markets for the securities being traded. ABC generally will seek competitive commission rates but may not necessarily obtain the lowest possible commission for transactions for the Account.

As a general matter, ABC considers it appropriate to use the execution services of Fidelity Investments Institutional Brokerage Group (hereinafter "Fidelity") for the purchase and sale of securities for managed client accounts, unless there are restrictions such as customer designation or legal requirements to the contrary. ABC has evaluated Fidelity and believes that it will provide ABC clients with a blend of execution services, commission costs and professionalism that will assist ABC in meeting its fiduciary obligations to clients. Clients should note that ABC participates in the Fidelity Institutional Wealth Services Program (hereinafter the "FIWS Program") offered to independent investment advisers by Fidelity. As a participant in the FIWS Program, ABC receives certain benefits that it would not receive if it did not offer investment advice to clients (See the disclosure at Item 13.A. of this Schedule F). ABC reserves the right,

however, to utilize other broker-dealers that provide prompt and reliable execution at favorable security prices and reasonable commission rates.

The best net price, giving effect to brokerage commissions and other costs, is an important factor in this decision, but a number of other judgmental facts are important as well. These include knowledge of negotiated commission rates currently available; the nature of the security being traded; the size and complexity of the transaction; the desired timing of the trade; the activity existing and expected in the market for the particular securities; confidentiality; and the execution; clearance and settlement capabilities and other relevant and appropriate services of the broker or dealer.

Transactions for each client account generally will be effected independently, unless ABC decides to purchase or sell the same securities for several clients at approximately the same time. ABC may (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among ABC’s clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and transaction costs and will be allocated among ABC’s clients in proportion to the purchase and sale orders placed for each client account on any given day.

Instead of allowing ABC to select brokers or dealers for the Account, clients may direct ABC in writing to use a particular broker or dealer to execute all transactions for the client’s account. In that case, the client will negotiate terms and arrangements for the account with that broker or dealer, and ABC may not obtain better execution services or prices from other broker/dealers or be able to “batch” client transactions for execution through other brokers/ dealers with orders for other accounts managed by ABC. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the Account than would otherwise be the case and may not receive best execution.

Benefits Provided By Fidelity to Anchor Bay Capital, Inc.

ABC utilizes the services of the Fidelity Institutional Wealth Services Program ("FIWS Program") sponsored by Fidelity, which we believe to be best-in-class in terms of the custodial services it offers to Registered Investment Advisers and their clients. Certain benefits are received by ABC which would not be received if ABC did not give investment advice to clients. While we receive the following benefits from Fidelity, any leading custodian of client assets would provide similar services. These benefits include: a dedicated trading desk that services FIWS Program participants exclusively, a dedicated service group and an account services manager dedicated to ABC's accounts, access to a real-time order matching system, ability to 'block' client trades, electronic download of trades, balances and positions, access, to an electronic interface with the FIWS Program software, duplicate and batched client statements, confirmations and year-end summaries, the ability to have advisory fees directly debited from client accounts (in accordance with federal and state requirements), availability of third-party research and technology, a quarterly newsletter, access to Fidelity mutual funds, access to AdvisorChannel.com (internet access to statements, confirmations and transfer of asset status), access to Account View, access to over 350 mutual fund families and 4,500 mutual funds NOT affiliated with Fidelity, of which over 2,000 have no transaction fee, the ability to have loads waived for ABC clients who invest in certain Fidelity loaded funds, when certain conditions are met and maintained and the ability to have custody fees waived.

ABC does not receive Soft Dollar benefits from Fidelity. We do not accept any form of compensation from Fidelity as an inducement to bringing in new clients.

Review of Accounts

Accounts are reviewed at least weekly via reports generated from ABCs portfolio management databases. On a daily basis the portfolio managers review asset allocation reports and rebalancing trade proposal reports to ascertain when accounts are out of balance with respect to the parameters that are defined by (1) the model portfolios and (2) tactical allocation determined by the investment committee. When the portfolio managers determine action is needed, the appropriate action (buying or selling securities) is taken to align the account with the portfolio model, adjusted to the current tactical allocation parameters.

Client Referrals

While ABC welcomes client referrals it does not compensate clients for those referrals.

Custody of Client Assets

ABC does not have custody of client assets. Client accounts are custodied at Fidelity Investments or another brokerage firm if directed by the client. The custodian sends

quarterly or monthly statements to the client, detailing account holdings and transactions. Clients should carefully review statements from the custodian. Clients may also receive performance reports and account statements from ABC, and are encouraged to compare any statements from ABC to statements from the custodian.

Investment Discretion

ABC requires that clients grant ABC the discretionary authority to determine which securities and the amounts of securities that are to be bought or sold for the client's account(s). Such authority shall be granted in writing.

Should the client wish to impose reasonable limitations on this discretionary authority, such limitations shall be included in this written authority statement. Clients may change/amend these limitations as desired. Such amendments shall be submitted in writing.

Proxy Voting

Proxy Voting Policy: Rule 206(4)-6 under the Advisers Act requires investment advisers subject to the rule to adopt and implement proxy voting policies and procedures. The proxy voting policies and procedures must be in writing and reasonably designed to ensure that the adviser votes in the best interests of clients, and must include procedures for addressing material conflicts between the interests of the adviser and those of its clients with respect to proxy voting. As a firm policy, Anchor Bay Capital, Inc. does not vote proxies on client positions. Clients who wish their proxies to be voted must do so themselves. Clients will receive proxies and other solicitations directly from their custodian or a transfer agent. Clients are welcome to contact ABC with any questions regarding proxies and other solicitations.

Class Actions, Bankruptcies and Other Legal Proceedings: ABC will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct ABC to transmit copies of class action notices to the client or a third party. Upon such direction, ABC will make commercially reasonable efforts to forward such notices in a timely manner.

Financial Information

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about ABC's financial condition. ABC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Privacy Policy

Your relationship with Anchor Bay Capital, Inc. is based on trust and confidence. To fulfill its responsibilities to you, Anchor Bay Capital, Inc. requires that you provide current and accurate financial and personal information. You deserve to expect that Anchor Bay Capital, Inc. will protect the information you have provided in a manner that is safe, secure and professional. Anchor Bay Capital, Inc. and its employees are committed to protecting your privacy and to safeguarding that information.

Safeguarding Customer Documents

We collect non-public customer data in checklists, forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.

During regular business hours access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the customer records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to observe Anchor Bay Capital, Inc. procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

Sharing Nonpublic Personal and Financial Information

Anchor Bay Capital, Inc. is committed to the protection and privacy of its customers' and consumers' personal and financial information. Anchor Bay Capital, Inc. will not share such information with any affiliated or nonaffiliated third party except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of Anchor Bay Capital, Inc.'s business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;

- In any circumstances with the customer's instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

Opt-Out Provisions

It is not a policy of Anchor Bay Capital, Inc. to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to opt out.

Complaint Notification

Please direct complaints to: Anchor Bay Capital, Inc., Attn: Scott Spiering, 5780 Fleet Street, Suite 308, Carlsbad, CA 92008. Telephone: (760) 602-3470