



56 Gun Club Drive Sheldon, SC 29941

(888) 426-2193

www.chesneyandcompany.com

Firm Brochure

9/1/2011

This brochure provides information about the qualifications and business practices of Chesney & Company. If you have any questions about the contents of this brochure, please contact us at: (888) 426-2193 or by email at schesney@chesneyandcompany.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. Additional information about Chesney & Company is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisors to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization. As such we have revised our ADV Part 2 form to reflect this new rule.

We have made some significant changes to the scope of business since our last update in June 2010 in narrowing our client focus and customizing our services to this target client.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (888) 426-2193 or by email at: schesney@chesneyandcompany.com.

Table of Contents

Material Changes	1
Advisory Business.....	4
Firm Description.....	4
Principal Owners	5
Investment Philosophy	5
Types of Advisory Services.....	6
Tailored Relationships.....	6
Managed Assets	7
Fees and Compensation.....	8
Description.....	8
Fee Billing	9
Other Fees.....	9
Past Due Accounts and Termination of Agreement	10
Compensation for Sales of Investment Products	10
Performance-Based Fees	10
Sharing of Capital Gains	10
Types of Clients	10
Description	10
Methods of Analysis, Investment Strategies and Risk of Loss	10
Methods of Analysis.....	10
Investment Strategies	11
Risk of Loss	11
Disciplinary Information.....	11
Legal and Disciplinary.....	11
Other Financial Industry Activities and Affiliations.....	12
Activities.....	12
Affiliations	12
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	13
Code of Ethics	13
Participation or Interest in Client Transactions	13
Brokerage Practices	14

Selecting Brokerage Firms.....	14
Soft Dollars.....	14
Directed Brokerage	14
Review of Accounts.....	14
Periodic Reviews	14
Review Triggers.....	14
Regular Reports.....	15
Client Referrals and Other Compensation	15
Incoming Referrals	15
Referrals to Other Professionals.....	15
Custody	15
Account Statements.....	15
Statements Provided by Chesney & Company	15
SEC “Custody”	16
Investment Discretion.....	16
Discretionary Authority for Trading.....	16
Limited Power of Attorney.....	16
Voting Client Securities	16
Proxy Votes	16
Financial Information	16
Financial Condition	16
Business Continuity Plan	18
General.....	18
Disasters.....	18
Alternate Offices	18
Information Security Program	18
Information Security	18
Privacy Notice	18

Advisory Business

Firm Description

Chesney & Company was founded in 1996 by Sheila M. Chesney. The company currently includes two employees, a Portfolio Administrator and a Client Service Representative. The company has long-term engagements with three independent contractor firms: Soulsby Accounting Group (bookkeeping/payroll/accounting), ConsiderItDone (administrative functions) and Murrell Accounting Group (portfolio data reconciliation/analysis). Chesney & Company is a Registered Investment Advisor with the SEC (Securities & Exchange Commission) and the primary office of the firm is based in Sheldon, South Carolina. Chesney & Company is organized as a sub-Chapter S Corporation under the laws of the State of South Carolina. Sheila M. Chesney is the owner. Sheila M. Chesney, Principal of the firm, holds a Master of Science degree in Financial Planning as well as the Certified Financial Planner® and Chartered Alternative Investment Analyst® designations and is currently preparing for the CFA Level II Exam. The Chartered Financial Analyst designation is awarded for successful completion of the three level exam series. The designation of Registered Investment Advisor does not in and of itself imply any certain level of skill or training.

Chesney & Company is a provider of Private Wealth Management to a target niche clientele including affluent individuals, families and their related entities, trusts and estates and family businesses. Our engagement provides clients with both comprehensive financial planning and investment management blended under the title of wealth management.

Chesney & Company's compensation is derived solely from fees paid directly from the client. The firm does not receive commissions based on the client's purchase of any financial product, including insurance. No commissions or fees are accepted in any form. No referral fees are paid or accepted. No benefits are received from custodians or brokers based on client securities transactions ("soft dollar benefits").

Assets under the management of Chesney & Company are held by independent custodians, including Charles Schwab & Company, National Advisors Trust Company, or others, in the client's name. Chesney & Company does not act as a custodian of client assets, although we may at times be considered by the SEC to technically have "custody" over certain types of accounts held at independent custodians. This occurs primarily in the case where Chesney & Company is the General Partner of a pooled investment fund and has the authority to direct investments in the fund or is the trustee of an unrelated trust and Chesney & Company is the investment advisor on the trust's investment accounts.

We may at times recommend other professionals (e.g., lawyers, accountants, insurance agents, real estate agents, etc.) upon request by our client. Other professionals are engaged directly by the client on an as-needed basis even when recommended by the Advisor. Conflicts of interest will be disclosed to the client and managed in the best interest of the client.

Principal Owners

Sheila M. Chesney, MS, CAIA®, CFP® is the 100% stockholder in Chesney & Company. There are no other firm stockholders.

Investment Philosophy

Chesney & Company believes that the fundamental question that needs to be answered by our client is how much risk they can tolerate. Chesney & Company views client risk in the aggregate including business risk, purchasing power risk, lifestyle risks as well as investment risk. The client's clearly articulated financial goals dictate the amount of investment risk required.

Our investment philosophy focuses on risk management. We believe that our clients have two very important objectives:

- Protect what I have and,
- Grow my wealth to achieve my financial goals

We believe that risk management includes the range of financial risks including income risk, liability risks, purchasing power risk, longevity risk, catastrophe risk as well as investment risk.

Our investment philosophy is designed around three fundamental themes:

- The world is global and investment opportunities exist around the world. We believe in the semi-strong form of the efficient market hypothesis which says that the markets are fairly informationally-efficient and that it is difficult for investors to achieve consistent returns that exceed the market. Also, most investors maintain a home-country bias. Our portfolio strategy endeavors to provide investors with the least expensive, globally-diversified portfolio deploying capital to the best opportunities wherever they might be.
- The second pillar of our investment strategy is that most traditional portfolios are limited to stocks and bonds. We believe that there are significant challenges to this investment style particularly for very long-term investors. The challenge facing bonds stems from having benefitted from a 30 year bull market driven by the significant fall in interest rates. We believe that this opportunity is over and that bonds will not serve the very long-term investor well because of the headwind posed by rising global interest rates. In addition, stocks have become more strongly correlated with each other and it has become more challenging to build a well-diversified portfolio using traditional equities --- even equities from a variety of different markets. All equities tend to move in tandem with each other.
- Third, the major challenge facing investors is funding an increasingly expensive lifestyle over an expanding lifespan. The continued erosion of purchasing power is the major risk investors must take into account in planning for the management of their wealth. We believe that this fact makes the best case for taking advantage of longer-term investment in inflation-hedging

opportunities (real assets including real estate, timber, oil, natural gas, private equity, venture capital, equipment leasing, etc.). The risk of illiquidity can be well balanced against the risk of running out of money prematurely.

Types of Advisory Services

Chesney & Company offers private wealth management to affluent individuals and their families. This is a holistic engagement combining both financial planning and investment management under the umbrella engagement. Chesney & Company provides investment management only as part of an on-going wealth management engagement except in unusual circumstances.

Service Offering

In performing its services, Chesney & Company is not required to verify any information received from the client or from the client's other professionals. Each client is advised that it remains his/her responsibility to promptly notify Chesney & Company when there is any change in his/her financial situation and/or financial objectives for the purpose of reviewing, evaluating or revising previous recommendations and/or services.

The following is the arrangement offered to clients:

Private Wealth Management

Chesney & Company's Wealth Management work is disciplined and process-driven. Our process spans the client discovery, goal setting, and data gathering stages leading to an analysis of the current situation after we review and determine the recommended actions in the five critical planning elements (asset protection, disability/income protection, debt management, investment planning, estate planning). Our annual review pulls together all of our successes and establishes the plan for the coming year. On an annual basis each element of the client's plan is scored and the plan receives a health grade which dictates the areas requiring attention in the coming year.

Investment Management Services

Investment Management is generally not provided as a stand-alone service. However, occasionally, members of a client's family or related entities (qualified plans) may receive investment management services as part of the client's comprehensive wealth management engagement. In the case of Investment Management-only clients, the process followed is a subset of the Private Wealth Management process.

Tailored Relationships

At Chesney & Company advisory services are tailored to the specific individual needs of our target client based on their long-term goals. The goals and objectives of each client are documented in our client relationship management system and in our client files maintained in electronic format.

In our initial Client Discovery process, Chesney & Company develops our client profile which includes not only our client's specific goals but their psychology (or behavioral biases), their expectations of us and of

the market as well as any constraints they want to put on the portfolio. The client's profile is saved in writing in our client relationship management system and any constraints are required to be in writing and be signed by the client and Chesney & Company. Agreements may not be assigned without client consent.

Managed Assets

As of June 30, 2011, Chesney & Company managed approximately \$73,327,334 in assets for approximately 324 accounts or 48 client households. Chesney & Company does not participate in any wrap fee programs.

Fees and Compensation

Description

Chesney & Company conducts an initial Concept Meeting with each prospective client to ascertain the needs of the prospect and their fit with our firm. Our engagement is based on a total fee for the combined financial planning and investment management service. Our minimum annual fee for the total engagement is \$35,000 and, for this reason, we are best suited to those individuals and families with either a complex situation or building wealth or who have a minimum and growing portfolio of at least \$3 Million. Our fees are not negotiable except as noted below.

Private Wealth Management

The financial planning retainer part of our total fee is billed quarterly in advance on the 15th of the month following the end of the calendar quarter. The initial quarter's retainer fee is pro-rated for the quarter and is due upon signing of the engagement.

The calculation of this retainer fee is based on the total situation and takes into account total assets, investable assets, types of assets, anticipated future additional assets, gross income, anticipated future earning capacity, complexity of the financial planning needs, relationships with other professionals and related accounts and can range from a minimum of \$5,000 to a maximum of \$25,000 for the initial year. The agreed upon fee is stipulated in the client engagement agreement.

The client engagement is re-evaluated for the second year and beyond in light of the specific situation and the retainer can range from \$3,000 to \$25,000. This agreed upon fee is specified in a new engagement agreement.

Clients who terminate mid-quarter are billed for the full quarter's retainer fee.

The Asset Management fee for all managed assets is billed quarterly in arrears based on the average daily balance in the portfolio over the previous quarter:

- Up to \$2,000,000 1.00% annually
- \$2,000,000 up to \$4,000,000 .90% annually
- \$4,000,000 up to \$6,000,000 .75% annually
- \$6,000,000 up to \$10,000,000 .50% annually

Portfolio assets exceeding \$10,000,000 may be individually negotiated.

Chesney & Company reserves the right to increase the asset management fee by .10% annually for assets not transferred either to Charles Schwab or National Advisors Trust Company.

Clients who terminate during the quarter are billed based on the average assets under management through the date that assets are transferred out.

Investment Management

Chesney & Company does not provide standalone Investment Management services except in unusual circumstances. However in the case where Chesney & Company does provide stand-alone Investment Management services, the same Asset Management fee noted above applies. Investment Management-only engagements are reviewed on an annual basis at which time it is determined whether the engagement should be converted to a Private Wealth Management engagement.

Fund Management - Red Tail Real Estate Opportunity Fund I, LLC

Chesney & Company serves as the investment adviser and sole Manager to the Red Tail Real Estate Opportunity Fund I, LLC (the "Fund"). This fund is a pooled real estate fund established in 2007. The fund was offered to a limited number of qualified investors. This fund has been closed to new investors since December, 2007 and final investments were made in 2011.

Under the terms of the Investment Management Agreement with the Fund, Chesney & Company receives a quarterly management fee paid in advance, equal on an annual basis, to 1% of the total capital commitments to the Fund. We do not receive a performance incentive fee for the management of this fund. This fee is in addition to the fees charged by the underlying investment partnerships in the fund. Chesney & Company is compensated only through the 1% management fee and does not receive any performance compensation or fees from the investment managers of the partnerships in which the Red Tail Real Estate Opportunity Fund I invests. Clients of the firm who are also investors in the fund are credited back for the management fee paid by the Red Tail Fund to Chesney & Company to eliminate any double charge. The National Advisors Trust Company maintains custody of the funds and is the administrator of the fund. Chesney & Company does not directly control the funds and does not have check writing authority. On a quarterly basis, National Advisors Trust Company provides a statement of the account directly to investors via the Red Tail Real Estate Opportunity Fund I, LLC Intralinks website.

Fee Billing

Clients may choose to have fees deducted quarterly from a designated brokerage account at their qualified custodian to facilitate billing, or to be invoiced directly. The client must consent in advance to direct debiting of their investment account for fees.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds, stocks, bonds, and exchange-traded funds. These charges are typically relatively small and are incidental to the purchase or sale of a security. In some cases, custodians also charge monthly, quarterly or annual custody fees. Fees for custody are disclosed to clients when this type of arrangement is recommended.

Mutual funds and exchange-traded funds generally charge a management fee for their services as investment managers. The management fee is included in the expense ratio. Mutual fund fees also include transaction charges for the purchase or sale of securities within the fund and may charge other fees as disclosed in the fund prospectus. These fees are in addition to the fees paid by the client to Chesney & Company.

Please see the section entitled “Brokerage Practices” on page 13 for more information.

Past Due Accounts and Termination of Agreement

Chesney & Company reserves the right to terminate work on behalf of any client whose account is more than 60 days overdue. In addition, Chesney & Company reserves the right to terminate any engagement where a client has willfully concealed significant information or who refuses to cooperate with our process by providing pertinent information about their financial situation when necessary and appropriate to providing proper financial advice, per the judgment of Chesney & Company. Clients may terminate their agreement at any time by providing written notice.

Compensation for Sales of Investment Products

Chesney & Company’s compensation is solely from the fees paid directly by our clients as noted above. The firm does not receive commissions based on the client’s purchase of any financial product, including insurance. No product solicitation fees in any form are accepted.

Performance-Based Fees

Sharing of Capital Gains

Chesney & Company does not use a performance-based fee structure because of the potential for conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client. However, the nature of asset-based fees allows Chesney & Company to participate in the growth of the client’s wealth. This also means that our fees can decline when the client’s portfolio declines in value.

Types of Clients

Description

Chesney & Company provides investment advice to individuals, families, trusts and estates. Advice may extend to the entities related to the client such as small businesses and charitable organizations, including foundations and endowments. Chesney & Company encourages all clients to participate actively in the wealth management process. The degree and scope of planning varies depending on the client. Chesney & Company primarily targets business owners, entrepreneurs, professionals with complex financial situations and minimum growing investable assets exceeding \$3 Million.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Chesney & Company primary investment strategy is based on fundamental analysis. The main sources of information include our on-site Bloomberg terminal as well as investment prospectuses, annual reports, SEC filings, conference calls with fund and portfolio managers and industry conferences.

Chesney & Company also believes in availing itself of the highest quality proprietary research from firms such as Grant's Interest Rate Observer, GaveKal, ValueLine, Ned Davis Research, Strategic Economic Decisions (Dr. Woody Brock) and others.

Investment Strategies

Chesney & Company's primary investment strategy is focused on the long-term growth of wealth. Chesney & Company follows the time-tested tenets of Modern Portfolio Theory (risk and reward are linked) and Asset Allocation (93% of the variance of portfolio returns can be attributed to the allocation of assets versus either market timing or security selection).

Our portfolio platform provides a diversified offering of both traditional investments and select private placements. Our investment strategy can be characterized as an endowment model seeking the growth of wealth even into perpetuity. In constructing our portfolios we may use a variety of investment vehicles including individual stocks, passively-managed mutual funds and exchange-traded funds as well as actively managed funds, individual bonds and a wide range of private partnerships. Portfolios are globally diversified to control the risks associated with traditional markets. The private placements that we recommend are with unrelated, third party investment managers who have displayed an expertise in certain disciplines. We lean heavily toward equities over fixed income given the very long time horizons of our clients and our belief that the accumulation of wealth is achieved through investments in growing businesses.

The actual investment strategy for any given client is based on their specific objectives, income needs and tax situation. We do not invest for short term purposes and have a mandatory five year minimum investment period for portfolio assets. Short-term capital requirements are handled through money market instruments, CDs and/or U.S. Treasury securities.

Risk of Loss

All investments have certain risks to be borne by the investor. Our investment approach is totally portfolio-oriented. We recognize that not all investments will perform as expected. However, our total portfolio approach is guided by the Prudent Investor Rule which is a legal doctrine which mandates that that a fiduciary invest assets as if they were her own. As with all investments clients face risks including: Loss of Principal Risk, Interest-Rate Risk, Market Risk, Inflation (or Loss of Purchasing Power) Risk, Currency Risk, Reinvestment Risk, Business Risk, Liquidity Risk and Financial Risk.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in any legal or disciplinary events related to past or present activities.

Other Financial Industry Activities and Affiliations

Activities

Chesney & Company does not participate in any other industry business activities except as the general partner of the Red Tail Real Estate Opportunity Fund I, LLC (see page 8 for information on this partnership).

Affiliations

Chesney & Company is a minority (less than 1%) shareholder in National Advisors Trust Company, a privately-owned trust company. Chesney & Company may at times recommend that clients custody funds at National Advisors Trust Company. This recommendation is based on the specific needs of the client.

Chesney & Company may recommend unrelated, third party investment managers in cases where these managers have a greater expertise in certain disciplines. We do not receive any compensation for these recommendations.

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

Code of Ethics

The employees of Chesney & Company have committed to abiding by a Code of Ethics and Fiduciary Oath as outlined by two organizations: National Association of Personal Financial Advisors (NAPFA) and the CFA Institute. The key points under the code of ethics are:

- Putting the client's interests first
- Objectivity
- Confidentiality
- Competence
- Fairness and Suitability
- Integrity and honesty
- Regulatory compliance
- Full disclosure
- Professionalism

CFP® designees are also held to the Code of Ethics as outlined by the CFP® Board of Standards. The Code of Ethics for NAPFA is available at the website, www.napfa.org. The Code of Ethics and Standards of Professional Conduct of the CFA Institute is available at the CFA website at www.cfainstitute.org. A copy of Chesney & Company's Code of Ethics is available at any time by contacting Nancy Harvey at nharvey@chesneyandcompany.com.

Participation or Interest in Client Transactions

Chesney & Company may at times buy or sell securities that are also held by clients. Chesney & Company employees may not trade for their own accounts and employee portfolios are managed by Chesney & Company. Employees comply with the provisions of Chesney & Company's "Policies and Procedures Manual".

The Chief Compliance Office of Chesney & Company is Sheila M. Chesney. At this time no employees execute personal trades on their own behalf and currently the size of the employee portfolios are not of significant enough value to affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

Chesney & Company does not have any affiliation with product sales firms.

Chesney & Company does make brokerage recommendations to clients based on their specific situation. Our recommended custodians (either Charles Schwab & Company or National Advisors Trust Company) have proven reputations for integrity and financial responsibility and provide either discount brokerage services (Charles Schwab & Company) or trust services (National Advisors Trust Company) with best execution of orders at reasonable commission rates and quality client service.

Chesney & Company recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab & Company and National Advisors Trust Company. Chesney & Company does not receive fees or commissions from any of these arrangements. We may benefit from electronic delivery of client information, the electronic trading platforms and other services provided by these firms. We may also benefit from other services including research, continuing education and practice management advice. These benefits are standard in a relationship with these custodians and are not offered in return for any client recommendations or transactions.

Chesney & Company reviews the execution of trades at each custodian annually. Our Best Execution review is documented in our "Policies & Procedures Manual". Trading fees charged by the custodians are also reviewed on an annual basis. Chesney & Company does not receive any portion of the trading fees.

Soft Dollars

Chesney & Company does not receive soft dollar benefits from the custodians to whom we recommend clients.

Directed Brokerage

Chesney & Company does not allow clients to direct brokerage.

Review of Accounts

Periodic Reviews

The frequency of reviews is based on the individual client situation. Our Wealth Management process reviews the client's Asset Allocation (including goals, investment philosophy, investment policy and rebalancing strategy) with the client annually. The client's portfolio is reviewed either monthly or quarterly depending on complexity and is evaluated for rebalancing annually. Investment Management clients have an annual meeting and portfolios are reviewed quarterly.

Review Triggers

Account reviews are monthly, quarterly, semi-annually or annually based on the specific client situation. A review outside the normal schedule may be triggered by a client request, changes in market

conditions, unusual inflow or outflow of cash, cash reserve management, tax strategy or other important changes.

Regular Reports

Chesney & Company utilizes the portfolio accounting platform of Black Diamond Portfolio Reporting. Clients are given access to Black Diamond and may review their portfolio at any time. Quarterly portfolio reports are published on the 15th of the month following the end of the calendar quarter along with a Quarterly Commentary. On an irregular basis clients may receive reports including individualized letters, general thoughts on the economy, information on specific investments, tax-related information, etc.

Client Referrals and Other Compensation

Incoming Referrals

Chesney & Company grows by virtue of referrals primarily from existing clients. Other referrals come from estate planning attorneys, accountants, personal friends and other sources. The firm does not pay for referrals.

Referrals to Other Professionals

Chesney & Company does not accept referral fees or any form of remuneration from other professionals when a prospect is referred to them.

Custody

Account Statements

All marketable assets are held at qualified custodians who provide account statements directly at their address of record at least on a quarterly basis. Clients may invest in private placements and these investments are not held at qualified custodians. In these cases, statements are generally provided directly by the investment principal at least annually. Clients are encouraged to carefully review the statements provided by their custodians.

Statements Provided by Chesney & Company

Clients are, at times, provided with financial reports, net worth statements and graphical representations of net worth that are generated from our portfolio accounting and by virtue of our financial planning analysis. Net worth statements contain approximations of values for assets and liabilities that are provided by the client. Values for assets such as land, real estate, limited partnerships and other hard-to-price assets are only best estimates at the time of creation of the report. The net worth statements are used for long-term planning and therefore the exact value of assets are not deemed to be material to the financial planning tasks. The book values of hard-to-price assets are reviewed whenever supplemental information relating to valuation is received. In the absence of such

information, these assets are priced at client cost. Clients are urged to compare the statements they receive from us to those they receive from their qualified custodians.

SEC “Custody”

According to a recent ruling by the SEC, investment advisors are deemed to have “custody” of client funds if certain conditions are met. From time to time, Chesney & Company may be technically considered to have “custody” of certain types of accounts. In these cases, the SEC requires an annual surprise audit of those “custodied” accounts by an independent CPA firm. Chesney & Company has complied with this requirement.

Investment Discretion

Discretionary Authority for Trading

Chesney & Company accepts discretionary authority to manage securities accounts on behalf of clients. We have the authority to determine without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority facilitates placing trades in clients’ accounts on their behalf so that we may promptly implement the investment policy that has been approved by the client.

Limited Power of Attorney

Clients must sign a limited power of attorney before Chesney & Company is given discretionary authority. The limited power of attorney is included in the qualified custodian’s account application for our main custodians. In the case where accounts are not held with our main custodians, clients may sign a separate limited power of attorney given discretionary authority to Chesney & Company.

Voting Client Securities

Proxy Votes

Chesney & Company does not take responsibility for voting proxies for securities over which it maintains discretionary authority. Clients will receive proxy statements either directly from the company or through the custodian.

Chesney & Company also reserves the right to decide whether or not to assist in making claims for security class action lawsuits. This determination is made in light of the value of the client’s holdings.

Financial Information

Financial Condition

Chesney & Company does not have any financial impairment that would preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because Chesney & Company does not serve as a custodian for client funds or securities, other than as described above, and

Chesney & Company does not require prepayment of fees of more than \$1,200 per client, six months or more in advance.

Business Continuity Plan

General

Chesney & Company believes that its leading-edge technology platform and virtual business model enable it to operate without interruption at all times.

Disasters

Chesney & Company operates as a paperless environment with all documentation stored “on the cloud”. Chesney & Company has designed its organization such that the business is spread across employees who work from their own home offices, independent contractors each of whom are responsible for their own specific part of the business operations and third party software providers each of whom focus on the skillset for which they are best suited. The disruption of any single aspect of the business will not significantly impair the day to day operation. Our “Policies & Procedures Manual” defines the specific processes for which each of these entities is responsible and would facilitate the training of a replacement should that requirement become necessary. The primary office of Chesney & Company is supported by T-1 Internet Service which is a monitored internet line.

Alternate Offices

Chesney & Company is operational in whole as long as even one member of the firm is able to access an internet browser. We are not reliant on physical office space to service our clients.

Information Security Program

Information Security

Chesney & Company utilizes leading-edge technology for the storage of all client information. Our data is stored electronically on web-based software platforms accessible only via password and these passwords are changed every 90 days. Chesney & Company engages the services of SMARSH, Inc. to password-protect and encrypt all electronic communication that includes anything of a confidential nature. In addition, Chesney & Company utilizes ShareFile, a password-protected web vault for the exchange of business files with our clients, their advisors and investment firms. ShareFile is used for the secure transmission of large documents.

Privacy Notice

Chesney & Company is committed to maintaining the confidentiality, integrity and security of the personal information entrusted to us.

The categories of nonpublic information that we collect from our clients may include information about personal finances, information about health to the extent that it is needed for the financial planning process, information about transactions between clients and third parties and information from consumer reporting agencies, e.g., credit reports. We use all of this information to help our clients meet their personal financial goals.

With our clients' permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom they have established a relationship. Clients may opt out from our sharing information with these nonaffiliated third parties. We require a signed letter of authorization from the client before disclosing any information with a nonaffiliated third party.

We do not provide personal information to mailing list vendors or solicitors. We require strict confidentiality agreements with the independent contractors who access personal information. Federal and State securities regulators may review our Company records and personal records as permitted by law.

Personally identifiable information will be maintained while still a client of Chesney & Company and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time all information may be destroyed.

We will notify our clients in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to our clients annually, in writing.