

SOLICITOR DISCLOSURES

Mitch Kitayama (herein Chairman or the "Solicitor") is providing a copy of the current Form ADV Part 2A (the "Disclosure Brochure") of the Advisor that you have been matched with (the "Advisor"). This is the Advisor's Disclosure Brochure under the Investment Advisers Act of 1940, as amended (the "Advisors Act") and required by the U.S. Securities and Exchange Commission ("SEC") to be provided to any client or prospective client before establishing a relationship with the Advisor as your investment advisor. This letter also informs you that Solicitor is employed by the Advisor in a Solicitor capacity in addition to his role as Chairman. Solicitor assists the Advisor in presenting the advisory services offered by the Advisor. For the term of your relationship with the Advisor, and according to an agreement between Solicitor and Advisor, the Advisor will pay Solicitor, per the terms of our standard agreement, the Advisor shall pay Solicitor a fee equal to up to 50% of the net income received from the referred client.

If the Advisor and Solicitor agree to materially modify our standard agreement, the Advisor will provide a disclosure of modified terms. Solicitor services include making introductions and providing information and material about the advisory services of the Advisor. In no event will the services include providing investment advisory services on behalf of Advisor in any manner. The compensation for Solicitor services is paid completely by the Advisor from the advisory fees earned, which are not increased or passed along to a client in any way. Advisory fees paid to the Advisor will not be increased because of our solicitation services. If you should have any questions about this relationship, please let me know.

Haddon Libby
Managing Partner
Winslow Drake Investment Management
39015 Bel Air Drive
Cathedral City, CA 92234
760.449.6349 c
213.596.8399 o
hlibby@winslowdrake.com