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Benefit Marketing Solutions LLC (BMS LLC) has a written "Identity Theft Prevention Program" that complies with the Red Flags Rule. This program is designed to detect the warning signs – or "red flags" – of identity theft in our day to day operations, take steps to prevent a crime, or mitigate any damage inflicted.

The program adopted by BMS LLC includes a means of detecting relevant warning signs of identity theft, including for example, unusual account activity, fraud alerts, or attempted suspicious use of the card or account, describes appropriate responses that would prevent mitigate a crime and details about our plans to keep the program updated.

The BMS LLC Red Flags Rule Plan is managed by their Executive Team and Compliance Officer.

Signature:           *Lori M. Andrews*          

Title:           *President/Owner*          

Date:           *September, 2010*