

Exhibit P

Identity Theft Protection Program –

ITPP Policy:

The King Wealth Management Group takes identity theft seriously. We are governed by the Know Your Customer Rule and as a fiduciary for our clients we have enacted the following fraud prevention policies to help mitigate risk.

To that end, our policy to comply with the Regulation S-ID is:

- We encode account client account numbers for all interoffice emails.
- Emails with sensitive information are sent via secure email (CypherPost) or are sent with password protection.
- We ask for client identification when opening new accounts.
- We ask security questions from clients and check interested party information before we give out client account information.
- We do not take any client instruction via email. We verbally confirm instructions with client before we act on such instructions. All Third party instruction must be in writing and confirmed verbally with the client.
- All computers in the office shut down after 15 minutes of non-use and employees are required to use a password to log back in; sharing of passwords is prohibited.
- We have a clean desk policy so that client information is locked up at night.
- Any mobile device that has client information is encrypted and/or password protected to safeguard client information outside of the office.
- Emails are monitored and reviewed on a daily basis.
- We use caller ID for the phones.
- We have pop up alerts to monitor client activity and money movements.
- Per our Code of Ethics, we act in professional manner and use our best judgment at all times to ensure our client's information remains confidential.
- Clients are notified of address changes. Disbursements from recently updated accounts over \$10,000 can be frozen for 10 days as a precautionary measure, depending on custodian.
- We maintain Commercial Liability and CyberInsurance policies.