



Business Continuity Plan

Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding supervised persons' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our clients to transact business.

In the event that we determine we are unable to continue business due to a SBD, we will direct clients to the respective custodian's service center for emergency assistance and access to the clients' accounts and funds. Depending on service availability, the firm will contact clients via phone, email, or posting information on our website.

The firm's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the firm's ability to communicate and do business, such as a fire in the building. External SBDs prevent the operation of the securities markets or a number of branches, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our approved custodians.

Business Description

We are an investment advisory firm that provides customized financial planning and wealth management services to a broad array of clients. Our Investment Advisory Representatives (IAR) offer clients (individuals, business entities, trusts, estates and charitable organizations, etc.) investment advisory services on a discretionary and non-discretionary basis. Certain of company's IARs are also registered with LPL as broker-dealer registered representatives.

Clients' Access to Funds and Securities

Our firm does not maintain physical custody of clients' funds or securities, which are maintained at approved qualified custodians. In the event of an internal or external SBD, if telephone service is available, supervised persons will take client orders or instructions and contact the applicable custodian on the client's behalf.

If the firm is unable to facilitate such requests, we will post on our website and on telephone system a recording that provides each custodian's service center information for emergency assistance and access to the clients' accounts and funds. The firm will also make this information available to clients through its disclosure statement.

Data Back-Up and Recovery

Our Firm maintains its primary books and records in Fairfield, NJ. The COO is responsible for the maintenance of these books and records. We also maintain back up electronic books and records in Fairfield; all electronic books and records are within Egnyte's, our cloud storage business constituent, database. Egnyte has its own redundancy and is backed up in real time. Additionally, the firm has its own remote backup server that are backed up daily.

Custodians

The firm has primary responsibility for establishing and maintaining our business relationships with clients and has sole responsibility for the firm mission critical functions of order taking, entry and execution. The firm's approved custodians provide the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities. There are documented and tested plans in place to provide for a fail-over between each custodian's primary and back-up sites.

Business Constituents and Systems

Critical business constituents are businesses with which the firm has an ongoing commercial relationship in support of operating activities such as vendors providing critical services. Approved custodians provide most of our critical services. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services.

Alternate Communication Between the Firm and Clients, Supervised Persons, and Regulators

Clients - We communicate with clients using the telephone, email, our website, fax, U.S. mail and in-person visits at our primary office or other office locations. In the event of a SBD, we will assess which means of communication are still available and update our voicemail to instruct clients to contact the applicable custodian, if we are unable to transact business for clients due to power or network outages

Supervised Persons - We communicate with supervised persons using the telephone, e-mail, and in person. In the event of a SBD, we will assess which means of communication are most appropriate in terms of speed and form (written or oral). The firm also employs a call tree so that the management team can efficiently communicate with supervised persons during an SBD.

Regulators – The firm is subject to regulation by the SEC and the various state regulators. We communicate with regulators using telephone, email, fax, U.S. mail and in person. In the event of a SBD, we will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that have been used in the past to communicate with regulators.

Updates and Annual Review

We test our business continuity plan annually to determine if the plan is effective or needs to be updated due to changes in the firm's location(s), clients, business, and or applicable regulations.