

## Business Continuity Plan/Disaster Recovery Plan

### 1. Wealth Watch Advisors Overview

#### Introduction

To meet regulatory expectations, the Wealth Watch Advisors' BCP/DR must be reasonably designed to ensure that the Wealth Watch Advisors can meet present obligations to customers in an unplanned interruption in business, such as in an emergency.

The regulators do not intend for all business continuity plans to be the same. Given the variety found among investments firms as well as the diverse nature of their businesses, Wealth Watch Advisors has designed a customized plan to meet operational, size, and other needs. Regulatory guidance suggests that our plan contain:

- Operational assessments;
- Provisions for a rapid resumption of mission-critical systems;
- Back-up arrangements for material relationships with business constituents, banks and appraisals of counter-party impact;
- Back-up system for recovery of data (both hard copy and electronic data);
- Alternate means for communications for use between employees and the Wealth Watch Advisors, as well as between customers and the Wealth Watch Advisors;
- Instructions for communications with regulators and regulatory reporting requirements in the event of a disaster;
- Description of the alternate physical locations of employees and/or certain departments;
- Assurance for customers' prompt access to their funds and securities in the event the Wealth Watch Advisors determines it is unable to continue its business;
- Provisions for updating the plan;
- Provisions for periodic testing of the plan; and
- Notification of relevant provisions of the plan to customers of the Wealth Watch Advisors.

Our plan will address each of the relevant elements above.

#### Wealth Watch Advisors Policy

Our Wealth Watch Advisors' policy is to respond to a Significant Business Disruption (SBD) by safeguarding employee's lives and Wealth Watch Advisors property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the Wealth Watch Advisors' books and records, and allowing our customers to transact business. If we determine we are unable to continue our business, we will assure customers prompt access to their funds.

#### Business Description

The following content section is used to briefly describe our business. Included in the description are the types of business we conduct, whether we hold customer funds or securities, information about our clearing Wealth Watch Advisors or custodian (if applicable), whether our customers are retail and/or institutional, and/or any other pertinent information.

Our Wealth Watch Advisors provides financial planning and investment management services to retail customers. The majority of client funds are held at TD Ameritrade, our primary custodian.

## Office Locations

Our Wealth Watch Advisors' office locations are listed below.

### Primary Office

8310 S. Valley Highway, Suite 107  
Englewood, CO 80112  
Phone: 855-822-3708

### Books and Records Location

8310 S. Valley Highway, Suite 107  
Englewood, CO 80112  
Phone: 855-822-3708

Wealth Watch Advisors' business model is designed around an individual IAR or a small group of IARs operating in and around the area they serve. Given the broad geographic nature of the firm's advisors, it would be impractical to address the needs of each individual office. Each IAR is encouraged to design a plan that is tailored to their unique needs. This plan may serve as a model for individual office plans.

## Designated Senior Manager

The senior managers named below are designated to approve our business continuity plan and are responsible for conducting an annual review, and each has the authority to execute the plan.

David Shields—Chief Executive Officer  
William Gastl—Chief Operating Officer  
Casey Eitler—Co-Director of Operations

## Updates to the Plan

The Wealth Watch Advisors will update this plan as necessary based on material changes to its operations, general business, organizational structure, or location. Among the types of changes that will be considered to be material are:

- Change of or an addition to the approved custodian;
- Reorganization or addition/termination of responsible parties named in this document;
- System enhancements, such as new network server, new back-up or retention software; and
- Any other change that would interfere with the orderly execution of this plan.

## Testing the Plan

To best ensure that the plan is adequate to provide means for rapid recovery of its essential systems, the Wealth Watch Advisors will conduct periodic testing that may include:

- Audit of the back-up data;
- Survey of responsible parties, including a duties assessment;

- Survey of Wealth Watch Advisors personnel to determine their knowledge of key components of the plan; and
- Planned disruption in any critical systems, such as the primary/secondary server or the central phone system. A record of the test results is retained among the Wealth Watch Advisors' central files and documents. The periodic testing shall occur at least annually.

## 2. Assessment of Risks

The following sections of the BCP/DR will first address the vital personnel that is needed for successful implementation of the plan it's critical systems, areas of importance to the ongoing operation of the Firm. Each section will address a specific type of risk and will provide information and instructions to managers charged with responsibility for those areas.

### Key Wealth Watch Advisors Personnel

In the event of an unplanned interruption in our business, it will first be important for us to identify integral personnel that are needed for successful implementation of the plan and how to contact them. Access to this information at the time of an emergency will facilitate the resumption of the Wealth Watch Advisors' operations.

The Team Leaders identified in the table below are responsible for implementing the plan in their respective area(s) in the event of an emergency or other interruption in our business. Several means of communicating with the individual(s) listed below is provided. Questions regarding this information may be directed to the Chief Operating Officer.

Name	Mobile Phone	E-Mail
<b>William Gastl</b>	720-203-6532	bill.g@wealthwatchadvisors.com
<b>Casey Eitler</b>	603-969-3403	casey.eitler@wealthwatchadvisors.com
<b>David Shields</b>	210-365-8611	david.s@wealthwatchadvisors.com
<b>Jason Moore</b>	704-517-7705	jason.moore@wealthwatchadvisors.com

### Risk Assessment of Critical Operation

For the Wealth Watch Advisors to resume its operations following an unplanned interruption, it must have an understanding of its mission-critical systems and its critical business constituents. The Firm must be prepared to implement steps to restore relationships, systems, and contracts accordingly. The following subsections contain pertinent information regarding the Wealth Watch Advisors' mission-critical systems and business constituents.

#### Critical Systems

Critical systems are those that are necessary to maintain the operation of the business. Depending upon the Wealth Watch Advisors' business or the nature of the transactions processed, this may consist of anything related to order taking, entry, execution, comparison, allocation, and settlement. Since a disaster might affect access customer accounts, associated persons (including employees, principals, and even clerical or ministerial staff) must be fully aware of how the plan will be maintained. This would include the systems for:

- Client and IAR communication;

- Order taking, order entry;
- Execution, comparison, allocation;
- Clearance and settlement of securities transactions;
- Maintenance of customer accounts, access to customer accounts; and
- Delivery of funds and securities.

Wealth Watch Advisors has identified a back-up system and/or point of contact to participate in its resumption and has been in contact with the parties responsible for back-up to confirm their readiness. Periodically, a senior manager of the Wealth Watch Advisors will re-verify the accuracy and completeness of this data. If necessary, an amended plan shall be made available to responsible parties.

**Service:** Client Communications

**Purpose:** Maintaining communication with all clients

**Responsible Employee:** Casey Eitler

**Phone:** 603-969-3403

**Email:** casey.eitler@wealthwatchadvisors.com

**Plan:** If the phone and voice mail system is out for more than 24 hours, clients will be emailed with information to reflect alternative contact methods. Additionally, Wealth Watch Advisors' website will be updated to reflect alternative contact methods.

If the email system is out for more than 24 hours, all IARs will be notified so each IAR can contact their clients via telephone with information regarding how to contact the Wealth Watch Advisors. Additionally, the Wealth Watch Advisors' website will be updated to reflect alternative contact methods.

If either of the above events occur all IARs and Solicitors will be contacted via email or phone and informed of the situation and alternative methods of contact.

### Assisting Groups

Assisting groups are those businesses that deliver critical services to the Wealth Watch Advisors. Assisting groups typically include clearing firms, custodians, other entities such as institutions, investment advisors or broker-dealers who perform significant functions or roles in transacting business or carrying accounts.

A representative of the Wealth Watch Advisors has contacted critical counter-parties to determine how a business might be carried out in the event of an emergency or other interruption. In particular, Wealth Watch Advisors has ascertained means through which it can continue to place and clear transactions in the event customary systems are disabled.

A brief description of the contingency plan for our critical counter-parties is captured in the table below. In the event of an emergency or other business interruption, the Team Leader responsible for contacting vendors and critical service providers (as identified in the Team Leaders table above) will use the information listed on the next page to make contact with counter-parties.

Service: SubAdvisor  
Vendor: Solomon API  
Contact: Matthew Myland  
Phone: 321-508-3911  
Email: matthew.m@solomonapi.com

Service: SubAdvisor  
Vendor: Taiber Kosmala & Associates, LLC  
Contact: Phil Kosmala  
Phone: 312-300-4781  
Email: philk@taiberkosmala.com

Service: SubAdvisor  
Vendor: First Trust Portfolios, LP  
Contact: Kyle Berthel  
Phone: 630-517-7723  
Email: kberthel@ftadvisors.com

Service: SubAdvisor  
Vendor: Howard Capital Management  
Contact: Jay Jones  
Phone: 404-630-0777  
Email: jay@howardcm.com

Service: Document Storage  
Vendor: ShareFile/Citrix  
Phone: 800-441-3453

Service: Account Aggregation  
Vendor: Orion Advisors Tech  
Phone: 402-496-3513  
Email: info@orion.com

Service: Risk Management Software  
Vendor: Riskalyze  
Contact: Emily Kung  
Phone: 530-392-4660  
Email: ekung@riskalyze.com

Service: Trading, Account Servicing, Billing  
Vendor: Coppell Asset Management DBA Fusion Capital Management  
Contact: Ryan Borer  
Phone: 402-214-1618  
Email: ryan.borer@fusioncapitalmanagement.com

Service: Custodian  
Vendor: TD Ameritrade  
Contact: East Coast Service Team  
Phone: 888-354-8361  
Email: coreeast3@tdameritrade.com

Service: Email/Social Media Archiving  
Vendor: Intradyn  
Contact: Customer Service  
Phone: 651-203-1600  
Email: support@intradyn.com

## Vendors

Vendors are businesses that support Wealth Watch Advisors' operations. These may include vendors that provide critical services to Wealth Watch Advisors, such as software suppliers, network administrators, accountants, or law firms.

When applicable or required, Wealth Watch Advisors has established terms through which to provide back-up to the services offered by other business constituents. Relevant, alternative suppliers are also disclosed in the table below.

Service: Compliance Consulting  
Vendor: FinArch Consulting  
Contact: Michael Wallin  
Phone: 615-319-7939  
Email: mwallin@finarch.com

Service: CPA  
Vendor: Sardoni and Associates  
Contact: John Sardoni  
Phone: 720-616-2188  
Email: jsardoni@sagpc.com

Service: Phone Service  
Vendor: CirrusLine  
Contact: Dean Galbreath  
Phone: 720-880-3601  
Email: dean@cirrusline.com

Service: E & O and Cyber Insurance  
Vendor: Travelers  
Contact: Scott Starita  
Phone: 303-495-2900  
Email: scott@synergyinsadvisors.com

Service: Internet Service Provider  
 Vendor: Comcast  
 Contact: Support  
 Phone: 800-391-3000  
 Website: business.comcast.com/help

Service: Network/Email  
 Vendor: Microsoft Outlook

Service: Property Management Company  
 Vendor: Artis HRA Inverness Point LP  
 Contact: Donna Schoen  
 Phone: 720-339-1474  
 Email: dschoen@mdcra.com

## Backup

### Data Backup and Retention

Wealth Watch Advisors maintains its primary copy of books and records at our primary place of business on electronic media and stores back-ups to those records in an off-site location.

If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Record Kept: All Records excluding email  
 Storage Device: Sharefile/Citrix  
 Backup Device: Sharefile/Citrix  
 Frequency of Backup: Daily  
 Storage Location: Citrix

Record Kept: Email  
 Storage Device: Intradyn  
 Backup Device: Intradyn  
 Frequency of Backup: Daily  
 Storage Location: Intradyn

### A Succession of Key Personnel

An unplanned absence of a key person, for reasons of a major disaster or otherwise, could result in interruptions in Wealth Watch Advisors' business. For this reason, the Firm has taken steps to plan for such absences, including the identification of key individuals/roles, and an outline for succession in the event of their unplanned absence.

The table below records lines of succession for key personnel.

Key Person: William Gastl  
Job Function: Chief Operating Officer  
Successor: David Shields

Key Person: Casey Eitler  
Job Function: Co-Director of Operations  
Successor: William Gastl

## Wealth Watch Advisors Financial and Credit Risk

Essential to our ability to manage risk is an understanding of where we face financial risk, including our ability to fund our operations and maintain adequate financing and sufficient capital.

Additionally, we must manage our credit risk. Credit risk might be experienced in the event of an emergency due to the erosion of investments or capital resulting from the lack of liquidity in the broader market. Financial and credit risk may hinder the ability of our counterparties to fulfill their obligations.

## Communications with Regulators

Wealth Watch Advisors recognizes the importance of notifying regulators promptly in the event of an interruption in the Wealth Watch Advisors' business operations.

In the event of a business disruption, Wealth Watch Advisors will use the most efficient means of communication then available to communicate with relevant regulatory bodies. This might include any of the following means: phone, email, fax, U.S. mail, overnight mail services or personal contact. We will also check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

## Contact Information for Regulators

Regulator Name: Securities and Exchange Commission  
Address: 100 F. Street, NE, Washington, DC 20549  
Phone: 202-551-6825 (Chief Counsel's Office for RIAs)  
Website: [www.sec.gov](http://www.sec.gov)  
Email: [IMOCC@sec.gov](mailto:IMOCC@sec.gov)

Regulator Name: Securities and Exchange Commission—Denver Regional Office  
Address: 1961 Stout St Suite 1700 Denver, CO 80294  
Phone: 303-844-1000  
Website: [www.sec.gov](http://www.sec.gov)  
Email: [denver@sec.gov](mailto:denver@sec.gov)

Regulator Name: Colorado Division of Securities  
Address: 1560 Broadway Suite 900 Denver, CO 80202  
Phone: 303-894-2320  
Website: [www.colorado.gov/dora/division-securities](http://www.colorado.gov/dora/division-securities)  
Email: [dora\\_SecuritiesWebsite@state.co.us](mailto:dora_SecuritiesWebsite@state.co.us)



## 3. Contingency Plans

Matters of general importance, including emergency contacts, communications, instructions for action during natural disasters and other types of emergencies are covered in the following sections of our plan. Wealth Watch conducts regular schedule times to test the validity of the plan. Test results are included and updated to this document as an attachment.

### Introduction

Emergency preparedness is the discipline which ensures an individual's or organization's readiness to respond to an emergency in a coordinated, timely, and effective manner. We may not have time to react when a disaster or emergency strikes. Therefore, it is imperative that we prepare in advance for a sudden emergency.

Wealth Watch Advisors has develop a disaster recovery and business continuity plan to meet its responsibilities to clients, business associates and all those who may be affected by a disruption in the Firm's business.

Wealth Watch Advisors' primary objective when responding to a significant business disruption (SBD) is to safeguard critical Wealth Watch Advisors property, making a financial and operational assessment, quickly recovering and resuming operations as can be reasonably expected based on the circumstances, protecting the Firm's most critical books and records, and allowing customers to continue to transact business. Wealth Watch utilizes cloud based functionality for all critical books and records, as well as all internal documents relating the client account information, new accounts, service records, as well as billing and trading records.

Interruptions in business many take many forms, including natural disasters, utility disruptions, and human-related events. Some interruptions may be localized and of short duration, whereas others may be life-changing events. The following is a list of significant disruptions that may affect Wealth Watch Advisors' business and its personnel.

Natural Disasters come in many forms, including tornados, snow, fires, and floods.

Vulnerability to certain natural disasters may increase with a particular geographic location; however, it is important to remember that everyone is "always" vulnerable to some form of natural disaster, irrespective of location.

- Utilities emergencies may include electrical, natural gas, water and communications.

Vulnerability to certain utility emergencies may depend on: the type of building, the type of city/state infrastructure and the service providers that Wealth Watch Advisors' business depends on. However, it is important to remember that everyone is "always" vulnerable to some form of utility emergency irrespective of location.

- Human action/inaction can result in many types of disasters. The most common types of human-caused disasters include transportation, strikes, terror, human error and chemicals. Just like all disasters, vulnerability to certain human action/inaction may depend on: the type of building, the type of city/state infrastructure, the service providers that the Firm's business de-

depends on, the industry, and employee demographics. However, it is important to remember that everyone is "always" vulnerable to some form of human-caused disaster.

- Significant business disruptions may vary in scope, affecting Wealth Watch Advisors, the building housing the Wealth Watch Advisors, the district where the Wealth Watch Advisors is located, the city where the Wealth Watch Advisors is located, or the whole region. Within each of these areas, the severity of the disruption may also vary from minimal to severe.
- In the event our Englewood based operations is unable to perform his daily duties for two-consecutive days, all calls and limited operations will be performed in its marketing department which is located in San Antonio, Texas.

## Type of Disruption

When we encounter the following various disruptions, we will respond in the following manner:

**Disruption:** Natural Disaster—Tornado, winter storm, blizzard causing electrical or telephone outage for brief (one to three days) periods.

**Response:** Employees who are unaffected can work remotely from their respective homes.

**Contact:** William Gastl or Casey Eitler

**Contact #:** 720-203-5632 or 603-969-3403

**Recover Time:** Typically, one to three days

**Disruption:** Natural Disaster—Fire and Flood losing access to the Wealth Watch Advisors' building longer periods, could lose the entire building

**Response:** Wealth Watch Advisors personal will work remotely from their home or an alternate location if their residence is not available.

**Contact:** William Gastl or Casey Eitler

**Contact #:** 720-203-5632 or 603-969-3403

**Recover Time:** Typically, one to three days

**Notes:** The Firm utilizes laptop computers for all key personnel. Key-personnel routinely take their computers with them at the end of each day. In the event of a natural disaster, each key-employee can access all corporate records, files, and affiliated partners remotely as long as there is no prolonged interruption of internet services.

**Disruption:** Death or disability of one of the owners

**Response:** Contact the other owner and CCO

Contact: William Gastl

Contact: David Shield

Contact #: 210-365-8611

Recover Time: Typically less than one day

### Methods of Communications Employee To Employee

The Team Leader, William Gastl, shall call the following employees in the event of a significant business disruption.

Name	Mobile Phone	E-Mail
<b>William Gastl</b>	720-203-5632	bill.g@wealthwatchadvisors.com
<b>Casey Eitler</b>	603-969-3403	casey.eitler@wealthwatchadvisors.com
<b>David Shields</b>	210-365-8611	david.s@wealthwatchadvisors.com

### Methods of Communications With Customers

Wealth Watch Advisors now communicates with its customers using the telephone, email, our website, fax, U.S. mail, through its IARs and Solicitors, and in-person visits at our office or at the other locations.

In the event of a significant business interruption, Wealth Watch Advisors 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 were used in the past to communicate with the other party. For example, if the Firm's communicated with a party by email but the Internet is unavailable, we will call them on the telephone or send a fax where a record is needed. When possible, preference will be given to have Wealth Watch Advisors' customer communications sent from the customer's IAR/Solicitor.

### Customer Access to Funds

Customer funds or securities are maintained at clearing firm(s), qualified financial institutions such as mutual fund or insurance product sponsors, or other custodians (s) named in the table below.

In the event of significant business interruption and if telephone service is available, appropriately qualified associated persons will take customer orders or instructions and contact the clearing firms on the customer's behalf when able. Customers are also informed by standard disclosure of the means through which they may directly access their funds at the custodian.

This information will provide immediate relief to customers in situations where a significant business disruption is so severe that it prevents the Wealth Watch Advisors from timely resumption or continuation in business.

If internet access is available, the Wealth Watch Advisors will post on its website that customers may access their funds and securities.

Website: [www.wealthwatchadvisors.com](http://www.wealthwatchadvisors.com)

## Clearing Wealth Watch Advisors(s)/Custodian(s)

Vendor: TD Ameritrade  
Contact: East Coast Service Team  
Phone: 888-354-8361  
Email: coreeast3@tdameritrade.com

## 4. BCP Disclosure Statement

Wealth Watch Advisors gives customers a written BCP disclosure statement at account opening. It also displays the disclosure statement on its website. Wealth Watch Advisors also posts the disclosure statement on its website and delivers it to customers upon request. A copy of the disclosure statement is maintained with the business continuity plan. The disclosure statement summarizes the operating areas covered in the business continuity plan, Wealth Watch Advisors' plans for business operation recovery and the existence of back-up facilities and arrangements.

## 5. Senior Manager Approval of the Business Continuity Plan

*By signing below, a senior manager and registered principal of the Wealth Watch Advisors hereby approves the plan and acknowledges he or she shall be responsible for conducting the required annual review.*

Signature: \_\_\_\_\_

Print Name and Title: *William Gastl, Chief Operating Officer*

Date of Approval: June 5, 2018 as an update to the former plan