

# Business Continuity Plan

## Background

While it is recognized it is not possible to create a plan to handle every possible eventuality, it is the intent of ABG Wealth to set up a framework to be used in the most likely of scenarios. It is also the intent that this framework provide guidance as to how to respond should an unforeseen situation occur.

ABG Wealth believes that an adviser's fiduciary obligation to its clients includes the obligation to take steps to protect the clients' interests from being placed at risk as a result of ABG Wealth's inability to provide advisory services after, for example, a natural disaster or, in the case of some smaller firms, the death of the owner or key personnel. The clients of an adviser that is engaged in the active management of their assets would ordinarily be placed at risk if the adviser ceased operations.

## Business Description

ABG Wealth conducts business in equity, fixed income, and other securities; it does not hold customer funds or securities. Transactions are sent to ABG Wealth's brokerage firm, which executes its orders, compares them, allocates them, clears and settles them. ABG Wealth's custodian maintains its clients' accounts, grants clients access to them, and delivers funds and securities.

## Emergency Information

### *Firm Contact Persons*

ABG Wealth's two emergency contact persons are:

Contact Name	Phone	Email	Relationship
Curtis L. Lyman	561-801-0287	clyman@abgwealth.com	CEO/CCO/CIO
Michael Robinson	561-28/1-2070	mrobinson@abgwealth.com	Director/Business Development

### *Support Services*

In the event of an emergency, the following is a list of support services and the methods by which they may be contacted:



<b>Alternative firm contact in case of death of Key Personnel</b>	Thomas Pollock, Mike Robinson and Raquel Bencosme
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This information will be updated in the event of a material change, and ABG Wealth's CCO will review the plan on an annual basis.

### **Firm Policy**

ABG Wealth's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting the firm's books and records, and allowing its clients to transact business.

In the event that ABG Wealth determines it is unable to continue its business, it will assure clients prompt access to their funds and securities.

### **Significant Business Disruptions (SBDs)**

ABG Wealth's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only ABG Wealth's ability to communicate and do business, such as a fire in its building or the death of a key member of the firm. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption.

ABG Wealth's response to an external SBD relies more heavily on other organizations and systems, such as the brokerage firm(s) and Internet Service Providers it uses.

#### **Pandemics, Epidemics, & Outbreaks**

ABG Wealth recognizes that pandemics, epidemics, and other types of outbreaks constitute business disruptions of a special nature. These situations impact not only ABG Wealth as a company, but also its personnel, clients, and vendors. Accordingly, ABG Wealth intends to implement the following procedures during such a situation.

#### ***General Business Operations***

Promptly, and then intermittently thereafter, ABG Wealth will conduct a high-level assessment of the situation's impact on business and operations. Specifically, ABG Wealth will identify and address:

- any weaknesses or unforeseen issues
- any inability to conduct essential operations or operate essential systems
- any inability to monitor third party vendors

#### ***Information Security & Remote Operations***

ABG Wealth will also alert personnel to the increase likelihood of phishing attempts and client impersonation schemes related to the situation. For example, bad actors may target individual staff members with requests for wire transfers posing as a client, emails related to state or federal work from home updates, changes to healthcare benefits, changes in information security policy related to working from home, software required to install on computers in order to work from home, the latest epidemic statistics, or even discounted offers on items in short supply. Accordingly, the firm will refer personnel to ABG Wealth's cybersecurity best practices and ensure that those practices are up to date.

If necessary, ABG Wealth will also conduct training for its personnel to address (i) potential information security issues commonly associated with remote work and (ii) the importance of protecting non-public client information at all times. In particular, advisory personnel are instructed to:

- access the internet only from secure WiFi connections or via a virtual private network ("VPN")
- avoid using public WiFi networks, which are vulnerable to exploitation
- store any sensitive, non-public information on non-company devices only after taking the proper security protections and obtaining authorization

If having personnel work remotely, then ABG Wealth will also:

- catalogue systems that cannot be accessed remotely, if any
- shut down non-essential hardware (e.g., computers)
- lock its physical storage (e.g., file cabinets) and all office access
- check in with building management, if applicable, to determine current security at the facility
- require that firm personnel continue following advertising guidelines for applicable communications
- ensure electronic cataloguing of communication is still taking place
- continue to document all interactions with clients, regardless of the medium of interaction
- update ABG Wealth's business continuity plan as needed

### ***Third Party Vendors***

If appropriate, ABG Wealth will endeavor to discuss with vendors the following:

- the vendor's business continuity efforts
- the vendor's disaster recovery plans
- the vendor's reliance on, and communications to date with, the vendor's vendors

### ***Company Personnel***

If appropriate, ABG Wealth will limit or altogether avoid in-person meeting with clients and advisory personnel and allow or require (as appropriate) personnel to work remotely. Any personnel that is limited in their ability to work remotely, will immediately inform their supervisor.

Limitations include but are not limited to:

- Inadequate hardware, software, or other systems
- Need to perform caregiving services for children or other persons
- Physical incapacity

If essential personnel are limited in their ability to work remotely, then the firm will determine if alternate or temporary personnel are available to perform necessary functions. Additionally, ABG Wealth will conduct check-ins with advisory personnel no less than weekly regarding remote work conditions.

### **Approval and Execution Authority**

The CCO is responsible for approving the plan and for conducting the required annual review. The CCO has the authority to execute this BCP.

### **Plan Location and Access**

ABG Wealth maintains copies of its BCP and annual reviews, and all changes that have been made. A physical copy of the BCP is stored with the company's Written Policies and Procedures Manual, which is kept in the following location: The hard copy of the firm's continuity plan is stored in the Capital Market Strategies Corporate Records at 301 Lake Shore Drive, #304, Lake Park, FL and a second copy is stored in the CMS/ABG Wealth Files maintained by Robert Avolio, Esq., in Lawrence Township, NJ. An electronic copy of this plan is stored: There are additional copies stored on the CCO's One Drive account and Box account in a file folder entitled "Business Continuity Plan."

Each employee is given a copy of the plan and notified of the location/file within ABG Wealth's electronic systems to which employees have access. Physical copies need to be returned upon termination of employment with the firm.

### **ABG Wealth's Custodian and Brokerage Firm Contacts**

Fidelity Brokerage Services LLC, (CRD# 7784)  
100 Crosby Parkway, KC1J  
Covington, KY 41015-8010  
(800) 523-1203

### **Office Locations**

ABG Wealth's primary office address and phone number are:

3801 PGA Blvd., Suite 600  
Palm Beach Gardens, FL 33410  
United States  
(561) 207-6399

### **Alternative Physical Location(s) of Employees**

In the event of an SBD that makes it impossible or impractical to use any or all of the company offices, ABG Wealth will move its staff from affected offices to the closest of its unaffected office locations.

If none of ABG Wealth's other office locations is available, it will move the firm operations to:

301 Lake Shore Drive  
#304  
Lake Park, FL 33403  
United States  
561-207-6399

## **Clients' Access to Funds and Securities**

ABG Wealth does not maintain custody of clients' funds or securities, which are maintained at its Custodian. In the event of an internal or external SBD, if telephone service and internet service are available, ABG Wealth's investment adviser representatives (IARs) will take customers' orders or instructions from its alternative locations, phone numbers, websites or alternative email addresses and contact its Custodian on their behalf. If internet access is available, ABG Wealth will post on its website that clients may access their funds and securities by contacting it.

## **Data Back-Up and Recovery (Hard Copy and Electronic)**

ABG Wealth maintains its primary hard copy books and records and its electronic records at its primary office.

The firm's CCO is responsible for the maintenance of these books and records. ABG Wealth maintains the following document types and forms that are not transmitted to its brokerage firm: Investment Policy Statements, Client Contracts and other related documents.

The firm keeps electronic records via SharePoint, a cloud-based technology.

ABG Wealth obtains the Business Continuity Plans of its electronic storage partners for access to its records in case of a regional event.

## **Operational Assessments**

### ***Operational Risk***

In the event of an SBD, ABG Wealth will immediately identify what means will permit it to communicate with its clients, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options ABG Wealth will employ will include its website, telephone voice mail, secure e-mail, etc. In addition, ABG Wealth will retrieve its key activity records as described in the section above. Employees will establish contact with the firm's Emergency Contacts and communicate key firm directives as they apply to operating the business whether it be from a new location, each employee's residence or an alternative regional location with access to a different power grid from the principal office.

## ***Mission Critical Systems***

ABG Wealth's "mission critical systems" are those that ensure client communication, access to client accounts and trading systems. More specifically, these systems include the office computer systems.

ABG Wealth has primary responsibility for establishing and maintaining its business relationships with its clients. ABG Wealth's brokerage firm/custodian provides the execution, comparison, allocation, clearance and settlement of securities transactions as well as the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

ABG Wealth's brokerage firm/custodian contract provides that the brokerage firm/custodian will maintain a business continuity plan and the capacity to execute that plan.

ABG Wealth's brokerage firm/custodian represents that it backs up ABG Wealth's records at a remote site. ABG Wealth's brokerage firm/custodian represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. It has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

Fidelity Brokerage Services LLC, (CRD# 7784) has the following SBD recovery time objectives: 3 minutes for critical, core trading functions and 10 minutes for critical, non-core trading functions.

### **The Firm's Mission Critical Systems**

#### ***Trading***

ABG Wealth uses the electronic order entry system provided by its custodian or another third party to enter trading activity and transactions. If electronic means are not available, ABG Wealth may place orders by fax or telephone, in which case order tickets will still be maintained.

In the event of an internal SBD, ABG Wealth will enter and send records to its brokerage firm by the fastest alternative means available. In the event of an external SBD, ABG Wealth will maintain the order in electronic or paper format, and deliver the order to the brokerage firm by the fastest

means available when it resumes operations. In addition, during an internal SBD, ABG Wealth may need to refer its clients to deal directly with its brokerage firm for order entry.

### ***Client Account Information***

ABG Wealth currently accesses client account information via its brokerage firm's website. In the event of an internal SBD, ABG Wealth would access client information via fax correspondence, alternate phone systems, etc. ABG Wealth may relocate to its alternative business location(s) if access to the brokerage firm website can be accomplished.

## **Alternate Communications with Clients, Employees, and Regulators**

### ***Clients***

ABG Wealth now communicates with its clients using the telephone, e-mail, its Website, fax, U.S. mail, and in person visits at ABG Wealth's or at the other's location. In the event of an SBD, ABG Wealth will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. For example, if ABG Wealth has communicated with a party by e-mail but the Internet is unavailable, ABG Wealth will call the party on the telephone and follow up and where a record is needed with paper copy in the U.S. mail. In the event of an anticipated significant regional business disruption, ABG Wealth will communicate to its clients in advance how to establish contact with it and its personnel or brokerage and custodian prior to the disruptive event occurrence.

### ***Employees***

ABG Wealth now communicates with its employees using the telephone, e-mail, and in person. In the event of an SBD, ABG Wealth will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. In the event of key employees being unable to perform their job functions, immediately and for any time period afterwards, ABG Wealth will delegate, if possible, those key functions to other employees.

### ***Regulators***

ABG Wealth communicates with its regulators using the telephone, e-mail, fax, U.S. mail, and in person. In the event of an SBD, ABG Wealth will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party.

## **Regulatory Reporting**

ABG Wealth is subject to regulation by the Securities and Exchange Commission (SEC). ABG Wealth now files reports with its regulators using the IARD/CRD System. In the event of an

SBD, ABG Wealth will check with the SEC to determine which means of filing are still available to it, and use the means closest in speed and form (written or oral) to its previous filing method. In the event that ABG Wealth cannot contact its regulators, it will continue to file required reports using the communication means available to it and forward those reports at the earliest opportunity.

***Regulatory Contact:***

Office of Compliance Inspections and Examinations  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549  
(202) 551-6200

Investment Adviser Regulation Office, Division of Investment Management  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549  
(202) 551-6999

**Death of Key Personnel**

The following personnel are identified as “Key Personnel” without which it would be difficult or impossible to continue operating the firm and/or properly service clients:

Curtis L. Lyman	CEO/CCO

If some event made it impossible for any person listed above to be able to continue to service the firm, ABG Wealth would implement the following succession plan:

In case of death of any key personnel, the following will assume the responsibility to make contact with the clients of the firm in the most efficient manner possible and as soon as possible to allow clients to access their accounts. If a business succession plan is to be implemented, clients will be contacted to obtain consent prior to any assignment of their advisory management contracts with this firm to a successor firm.

Thomas Pollock	Advisor, CFP
Michael Robinson	Advisor, Director of Client Services

## Updates and Annual Review

ABG Wealth will update this plan whenever it has a material change to its operations, structure, business or location or to those of its brokerage firm. In addition, ABG Wealth will review this BCP annually, to modify it for any changes in its operations, structure, business, or location or those of its brokerage firm.

## Approval & Signature

### *Supervisor Approval*

Approve the firm's Business Continuity Plan (BCP) program by signing below.

I have approved this Business Continuity Plan as reasonably designed to enable ABG Wealth to meet its obligations to clients in the event of a Significant Business Disruption.

Signed:

<b>Officer Name and Title:</b>	Curtis Lyman CEO, CIO
<b>Supervisor Signature</b>	<b>Date</b>

