

GenWealth Financial Advisors  
Business Continuity Plan (BCP)

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## **I. Introduction**

This manual documents the business continuity plan for GenWealth Financial Advisors and GenWealth Insurance Services, a LPL Financial branch office that conducts business in Retirement Planning, Financial Planning and Investments. The purpose of this manual is to document the plans for the recovery of our critical business functions and systems in the event of a business disruption.

## **II. Emergency Contact Persons**

LPL Financial provides FINRA with the contact information for 2 emergency contact persons to fulfill this requirement for all branch office locations under LPL Financial. These 2 emergency contact persons are registered principles for the LPL Financial. LPL Financial stays in compliance by updating this information upon any material change and reviewing the information quarterly to ensure it is up to date.

*Rule: FINRA Rule 4370(f); NASD Rule 1160.*

## **III. Branch Policy**

Our branch's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and our property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of our branch's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will direct our customers to the LPL Financial service center at (800) 877-7210 for emergency assistance and access to their funds.

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

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our branch's ability to communicate and do business, such as a fire in our 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 LPL Financial.

### **B. Approval and Execution Authority**

John Shrewsbury, a registered principal and co-owner, is responsible for approving the plan and for reviewing it annually.

Janet Walker, a registered principal and co-owner, *has* the authority to execute this BCP.

### **C. Plan Location and Access**

Our branch will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on our firm website: [www.getreadyforthefuture.com](http://www.getreadyforthefuture.com).

*Rule: FINRA Rule 4370(b), (d) and (e).*

#### **IV. Business Description**

Our branch office conducts business in: mutual funds, variable annuities, alternative investments, equity and fixed income. We accept and enter orders and service retail customers.

LPL Financial performs all clearing functions and holds customer funds or securities on our behalf. All transactions are sent to LPL Financial, which executes our orders, compares them, allocates them, clears and settles them. LPL Financial also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

LPL Financial is located at:

##### **Boston**

LPL Financial  
75 State St  
24<sup>th</sup> Floor  
Boston, MA 02108

##### **Charlotte**

LPL Financial  
Five Coliseum Centre  
2810 Coliseum Centre Dr.  
Charlotte, NC 28217

##### **San Diego**

LPL Financial  
4707 Executive Drive  
San Diego, CA 92121

Our contact number for LPL Financial is:  
(800) 877-7210

#### **V. Office Locations**

Our *office locations* are:

612 W. Commerce St, Suite 2  
Bryant, AR 72022 / 501-653-7355

606 W. Commerce St, Suite 1  
Bryant, AR 72022 / 501-653-7355

11601 Pleasant Ridge Road  
Little Rock, AR 72212/ 501-217-8031

301 N. Washington, Ste 101  
El Dorado, AR 71730/ 870-875-1210

998 Shady Grove, Unit E  
Hot Springs, AR 71901

4921 Shed Road, Suite 200  
Bossier, LA 71111

7330 Fern Avenue, Suite 401  
Shreveport, LA 71105

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

In the event of an SBD, we will move our staff from affected office(s) to the closest of our unaffected office location(s). If none of our other office locations is available to receive those staff, we will move them to:

Crowne Plaza Hotel  
201 South Shackleford Road  
Little Rock, AR 72211

*Rule: FINRA Rule 4370(c)(6).*

## **VII. Customers' Access to Funds and Securities**

LPL Financial maintains custody of customers' funds or securities on our behalf. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact LPL Financial on their behalf, and if our Web access is available, our branch will post on our website that customers may access their funds and securities by contacting LPL Financial at: (800) 877-7210.

If the Securities Investor Protection Corporation (SIPC) determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

*Rules: FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; see also 15 U.S.C. § 78eee.*

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

Our branch maintains its primary hard copy books and records at:  
GenWealth Financial Advisors  
612 West Commerce, Suite 2  
Bryant AR 72022

Our branch maintains its primary electronic records at:  
GenWealth Financial Advisors  
612 West Commerce, Suite 2  
Bryant AR 72022

John Shrewsbury, managing member, 501-653-7355, is responsible for the maintenance of these books and records. Our branch maintains the following document types and forms that are not transmitted to LPL Financial: New Account forms, Data Collection forms, Applications.

Our branch maintains backup hard copy books and records at: N/A

Our branch backs up electronic records at: LPL Financial IDocs System

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. 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.

*Rule: FINRA Rule 4370(c)(1).*

## **IX. Financial and Operational Assessments**

### **A. Operational Risk**

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). If needed, we will direct customers directly to LPL Financial at: (800) 877-7210.

*Rules: FINRA Rules 4370(c)(3),(c)(4), (c)(5), (c)(7), (c)(9 & (g)(2)).*

### **B. Financial and Credit Risk**

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact LPL Financial, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the appropriate steps.

*Rules: FINRA Rules 4370(c)(3), (c)(8) & (g)(2).*

## **X. Mission Critical Systems**

“Mission critical systems” are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, entry and execution]. LPL Financial provides 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.

### **A. Our Branch’s Mission Critical Systems**

## **Order Taking**

Currently, we receive orders from customers via telephone, or in person. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. If customers are unable to reach the branch to place trades they can contact LPL Financials Service Center at (800) 877-7210.

## **Order Entry**

Currently, we enter orders by recording them on paper and electronically and sending them to LPL Financial electronically through BranchNet or telephonically. LPL Financial represents under its BCP, we can expect service restoration within 4 Hours

In the event of an internal SBD, we will enter and send records to LPL Financial by the fastest alternative means available, which include telephone or BranchNet. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to LPL Financial by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with LPL Financial for order entry.

## **Order Execution**

LPL Financial executes orders on our behalf. LPL Financials Charlotte and San Diego offices serve as primary locations for Trade Execution. Each office serves as the backup for the other. There are documented and tested plans in place to provide for a fail-over between the two sites.

## **Other Services Currently Provided to Customers**

In addition to those services listed above in this section, we also provide account servicing, Financial Planning and other financial services. In the event of an internal SBD, we would provide these services at the alternate location(s) listed above. In the event of an external SBD, we would provide these services at the alternate location(s) listed above.

### **B. Mission Critical Systems Provided by LPL Financial**

Our branch relies on LPL Financial to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

LPL Financial backs up our records at a remote site. LPL Financials Charlotte and San Diego offices serve as primary locations for mission-critical processing, including: Operations, Trade Execution and Processing, and the Service Center. Each office serves as the backup for the other. There are documented and tested plans in place to provide for a fail-over between the two sites.

*Rules: FINRA Rules 3510(c)(2) & (g)(1).*

**XI. Alternate Communications between the Firm and Customers, Employees, and Regulators**

**A. Customers**

We now communicate with our customers using the telephone, email, our website, fax, U.S. mail and in-person visits at our office or another location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

*Rule: FINRA Rule 4370(c)(4).*

**B. Employees**

We now communicate with our employees using telephone, email, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: John Shrewsbury

<b>Caller</b>	<b>Call Recipients</b>
<i>John Shrewsbury</i>	<i>Janet Walker, Alisha Macom, Mona Khairi</i>
<i>Janet Walker</i>	<i>Kimmy James, Teresa Arrigo, Tim Key, Scott Inman, Mason Cozart, Eric Stoffel, Patty Rennie, Hannah Bryant, Austin Evans</i>
<i>Alisha Macom</i>	<i>Casey Cochran, Sean Shrewsbury, Chanel Hicks, Brandon Grable, Charles Skinner, Candice Stanley, Faith Young, Don Salter</i>
<i>Mona Khairi</i>	<i>Ginger Young, Kelli Conley, Robin Goff, Troy Johnson, Joel Newburn and Lexie Newburn, Megan Williams</i>

Rule: FINRA Rule 4370(c)(5).

**C. Regulators**

We communicate with our regulators using telephone, email, fax, U.S. mail and in person.. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

Rule: FINRA Rule 4370(c)(9).

**XII. Critical Business Constituents, Banks, and Counter-Parties**

**A. Business constituents**

Critical business constituents are businesses with which we have an ongoing commercial relationship in support of our operating activities such as vendors providing critical services.

LPL Financial provides most of our critical services. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

Our other critical business constituents are:

PC Assistance	IT Support	Complete Computing

Rules: FINRA Rule 4370(c)(7).

**B. Banks**

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: First Security Bank, Amy Tarvin, 20697 Interstate 30, Bryant, AR 72022.

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from Arvest Bank, Reynolds Road, Hwy 5, Bryant 72022.

Rules: FINRA Rule 4370(c)(7).

**C. Counter-Parties**

LPL Financial maintains the relationships with our critical counter-parties on our behalf.. Where the transactions cannot be completed, we will work with LPL Financial or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Rules: FINRA Rule 4370(c)(7).

### **XIII. Regulatory Reporting**

We are subject to regulation by the SEC, FINRA and Arkansas Securities Department, Arkansas Insurance Department. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, email and the Internet. In the event of an SBD, we will 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.

SEC 800-SEC-0330

FINRA 301-590-6500

Arkansas Insurance Department, 1200 West 3<sup>rd</sup> Street, Little Rock, AR 72201 501-371-2600

Arkansas Securities Department, 201 East Markham Street, Little Rock, AR 72201  
501-324-9260

*Rule: FINRA Rule 4370(c)(8).*

### **XIV. Disclosure of Business Continuity Plan**

LPL Financial has a BCP disclosure statement that is provided to our customers at account opening and attached to this document as "Attachment A". The BCP Disclosure statements is also posted to [www.lpl.com](http://www.lpl.com) and mailed to customers upon request.

*Rule: FINRA Rule 4370(e).*

### **XV. Updates and Annual Review**

We will update this plan whenever we have a material change to our operations, structure, business or location or to those of LPL Financial. In addition, our firm will review this BCP annually to modify it for any changes in our operations, structure, business or location or those of LPL Financial.

*Rule: FINRA Rule 4370(b).*

### **XVI. Senior Manager Approval**

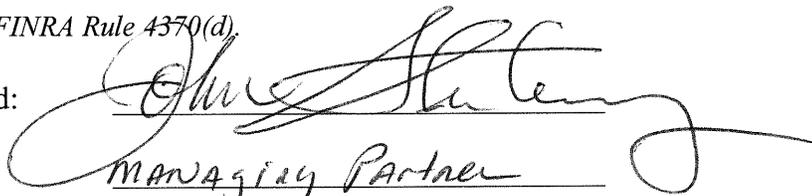
I have approved this Business Continuity Plan as reasonably designed to enable our branch to meet its obligations to customers in the event of an SBD.

*Rule: FINRA Rule 4370(d).*

Signed: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

  
MANAGING PARTNER  
3/24/2017

## **LPL Financial & Affiliate Business Continuation Plan Summary**

LPL Financial and our affiliate—The Private Trust Company—are committed to providing timely service to our clients. We recognize the importance of preparing for various disaster scenarios that could hamper our ability to provide service. We have taken aggressive steps to provide for business contingency and continuity planning under a variety of potential scenarios. We continue to evaluate our continuity plans and take the necessary actions to ensure the proper resources are available to provide for the recovery and timely resumption of critical business operations to internal business units, third-party business partners, and clients.

### **LPL Financial Business Continuation Strategy**

#### **Headquarters and Staff**

LPL Financial has headquarters and operations staff located in three principal locations: Boston, Charlotte, and San Diego. The Boston office serves as the primary site for our executive office, Legal, and Research. These units, while vital to the company on a continuing basis, are not considered mission-critical for the daily back-office operation of our business. In the event of a disaster that would make the Boston office unserviceable, the San Diego office is its alternative facility.

#### **Mission-Critical Departments**

Both the Charlotte and San Diego offices serve as primary locations for our mission-critical departments, including: Operations, Trade Execution and Processing, and the Service Center. Each office serves as the backup for the other. There are documented and tested plans in place to provide for a fail-over between the two sites.

The LPL Financial Production Data Center is located in a second and distinct Charlotte location. The alternate Data Center is located within the firm's San Diego location.

- The Production Data Center facility is located approximately two miles from the Charlotte office location.
- The Production Data Center infrastructure is fully redundant in terms of power, network, and equipment.
- The seven buildings at the San Diego location also have fully redundant networking and telecommunications systems.
- There is redundant connectivity across Boston, Charlotte, and San Diego.

The LPL Financial brokerage computing platform is operated in another geographical region of the United States by an unaffiliated third-party vendor. None of the scenarios presented in this document would pose a threat of business disruption to this remote site. The third-party vendor has a complete business continuity plan that includes alternative sites and recovery times within four hours.

### **Business Scenario Preparedness**

#### **Single Building Disruption**

If LPL Financial loses the ability to perform business in one of our buildings, recovery staff associated with mission-critical functions will begin processing at our alternate processing site (Boston, Charlotte, or San Diego, depending on the impacted department).

We have plans in place for this relocation, and these plans are tested periodically. Recovery time objectives vary based on the criticality of the function that is disrupted.

### **Campus Disruption**

If LPL Financial loses the ability to perform business at either the Charlotte or San Diego location, mission-critical San Diego functions would be failed over to our Charlotte office and vice versa. Staff associated with non-mission-critical functions will be relocated to an alternative site (e.g., hotel, home) in an unaffected area. We have plans in place for this relocation and they are tested periodically. Recovery time objectives vary based on the criticality of each function.

### **Remote Data Center Disruption**

If LPL Financial loses the ability to perform business in our Production Data Center in Charlotte, mission-critical systems will be recovered to our San Diego Data Center. We have plans in place for this recovery and they are tested periodically. Mission-critical systems recovery is expected within four hours.

### **Pandemic Event**

LPL Financial has plans in place to continue business during a pandemic event. Our plan is a multi-tiered action plan based on the World Health Organization (WHO) alert phases with triggering events for each phase. As the threat of a pandemic becomes greater and a new phase is triggered, we will assess our plans and determine the appropriate course of action.

### **Access to Your Funds**

A site outage should not impact our customers' ability to access to their available funds, as LPL Financial business contingency plans are designed to ensure sustained service. However, their ability to trade securities may be impacted by market events outside the control of LPL Financial, such as when the market was closed following the September 11 tragedy. Our tested business continuity plans result in necessary personnel being available to approve transactions that result in the disbursement of available funds. In the event that your LPL Financial advisor ceases operations due to a significant business interruption, you may call (800) 877-7210 for emergency assistance.

### **Conclusion**

Please be aware that, while we have detailed plans in place, we cannot guarantee that we will be successful in achieving recovery in the times noted above. For example, we may not be able to implement a plan during a disaster as quickly as we expect, or there may be disasters that we have been unable to anticipate and for which we have no plan. Additionally, if parts of our plan are dependent upon third parties, we will have no control over the success or failure of the third party to respond appropriately to the challenges posed at the time of the disaster. Our continuity plans are periodically updated and modified. Updated plan summaries will be made available on our website ([www.lpl.com](http://www.lpl.com)) and can be obtained by submitting a written request.

Attachment B: Damaged Books and Records Log

**Finra Guidance on Books and Records Maintained at the Affected Locations**

*Members that maintained books and records at the affected locations should make every effort to retrieve or back-up such records. If any such records were permanently destroyed, a list of the types of books and records required to be maintained pursuant to NASD Rule 4510 and SEA Rules 17a-3 and 17a-4 must be prepared. The list should include the time periods affected, but need not include records that can be recreated from an electronic database or that can be retrieved otherwise from a service bureau, back-up records storage facility, etc. All such lists must be submitted to LPL Financial through the Compliance Service Center at 1-(800) 877-7210 x6835.*

Identifiable? (Y/N)	Document Category (Finra Rule 4510, NYSE Rule 440 or SEC Rules 17a-3 and 17a-4)	Description of records and information contained	Time Period	Backed Up/ Stored Electronically ? (Y/N)	If stored offsite or electronically enter location	Can be re- created? (Y/N)
