

BUSINESS CONTINUITY PLAN

OCTOBER 2021

1. EMERGENCY CONTACTS:

THE FIRMS CONTACT PERSON IS:

SCOTT J. ZOLLO, President CELL (585) 415-0445
szollo@corealpha.com

NAMES SHALL BE UPDATED AS INFORMATION CHANGES.

2. FIRMS POLICY:

THE FIRM'S POLICY IS TO PROTECT REPRESENTATIVES' LIVES AND FIRMS PROPERTY TO THE BEST OF OUR ABILITY IN RESPONSE TO A SIGNIFICANT BUSINESS DISRUPTION (SBD).

BEST EFFORTS WILL BE MADE TO QUICKLY RECOVER AND RESUME OPERATIONS, PROTECTING THE FIRM'S BOOKS AND RECORDS AND ALLOWING CUSTOMERS TO TRANSACT BUSINESS. SINCE NO FUNDS ARE HELD IN OUR OFFICE, CUSTOMERS WILL BE REFERRED TO THE PROPER CUSTODIAN, MUTUAL FUND OR INSURANCE COMPANY.

- A. OUR PLAN CONSIDERS TWO TYPES OF DISRUPTIONS, INTERNAL AND EXTERNAL.
- B. SCOTT ZOLLO, A REGISTERED PRINCIPAL IS RESPONSIBLE FOR APPROVING AND CONDUCTING THE REQUIRED ANNUAL REVIEW. HE HAS THE AUTHORITY TO EXECUTE THIS "BCP".
- C. THE FIRM SHALL MAINTAIN A HARD COPY OF ITS BCP, THE ANNUAL REVIEWS AND CHANGES THAT HAVE BEEN MADE TO THE PLAN AS THEY OCCUR, FOR INSPECTION. A COPY OF OUR PLAN IS LOCATED IN DROPBOX UNDER "BUSINESS CONTINUITY PLAN".

BCP OCTOBER 2021**3. BUSINESS DESCRIPTION:**

OUR FIRM CONDUCTS BUSINESS IN MUTUAL FUNDS, ANNUITIES, 529 PLANS AND RISK MANAGEMENT. WE ARE AN "INTRODUCING FIRM" AND DO NOT PERFORM ANY TYPE OF CLEARING FUNCTION. WE DO NOT HOLD ANY CUSTOMER FUNDS OR SECURITIES.

CLIENTS CAN CONTACT THE CUSTODIAN, MUTUAL FUND, INSURANCE OR RISK MANAGEMENT COMPANIES AT ANY TIME FOR ACCOUNT INFORMATION. THE FIRMS SERVICES ONLY RETAIL ACCOUNTS AND DOES NOT ENGAGE IN ANY PRIVATE PLACEMENTS.

4. OFFICE LOCATION:

THE FIRMS ARE LOCATED AT 1701 CHILI AVENUE, ROCHESTER, NEW YORK. THE MAIN TELEPHONE NUMBER IS (585) 235-3600. OUR EMPLOYEES MAY TRAVEL TO THIS OFFICE BY MEANS OF CAR ONLY. WE ACCEPT ALL APPLICATIONS AT THIS OFFICE.

5. ALTERNATIVE PHYSICAL LOCATION OF EMPLOYEES:

THERE ARE 11 REPRESENTATIVES OF THE FIRM. IN THE EVENT OF AN SBD, EMPLOYEES WOULD BE DIRECTED TO ANOTHER LOCATION TO RESUME BUSINESS ACTIVITIES. THAT LOCATION IS 9 PORTOFINO CIRCLE, HENRIETTA, N.Y. CONTACT PERSON IS SCOTT ZOLLO, CELL (585) 415-0445.

6. CUSTOMER ACCESS TO FUNDS AND SECURITIES:

SINCE THE FIRMS DO NOT HOLD ANY CLIENT FUNDS OR SECURITIES, CLIENTS WOULD BE REFERRED DIRECTLY TO THE CUSTODIAN, FUND COMPANY OR INSURANCE COMPANY WHERE FUNDS ARE BEING HELD.

7. DATA BACK UP AND RECOVERY:

ALL RECORDS ARE HELD AT THE MAIN OFFICE OF THE FIRM (HARD COPY). SCOTT ZOLLO, PRINCIPAL IS RESPONSIBLE FOR THE MAINTENANCE OF THESE BOOKS AND RECORDS. RECORDS SHALL BE AUTOMATICALLY BACKED UP TO AN OFF-SITE, UNDISCLOSED LOCATION.

BCP OCTOBER 2021**8. FINANCIAL AND OPERATIONAL ASSESSMENTS:**

IN THE EVENT OF AN SBD, WE WILL IDENTIFY WHAT MEANS WILL PERMIT US TO COMMUNICATE WITH OUR CUSTOMERS AND REPRESENTATIVES.

IN THE EVENT OF AN SBD, WE WILL DETERMINE THE VALUE AND LIQUIDITY OF OUR INVESTMENTS BY CONTACTING THE FUND COMPANY, IF POSSIBLE. WE WILL ALSO CONTACT OUR BANKING INSTITUTION TO EVALUATE OUR ABILITY TO CONTINUE OUR OPERATIONS AND REMAIN COMPLIANT.

IF WE CANNOT REMEDY A CAPITAL DEFICIENCY, WE WILL FILE THE APPROPRIATE PAPERWORK AND NOTICES WITH OUR REGULATORS.

9. MISSION CRITICAL SYSTEMS:

THE FIRM'S "MISSION CRITICAL SYSTEMS" ARE THOSE THAT ENSURE PROMPT AND ACCURATE PROCESSING OF INCOMING CUSTOMER APPLICATIONS AND CHECKS. SHOULD AN SBD OCCUR, WE WILL DO EVERYTHING IN OUR ABILITY TO CONTINUE "BUSINESS AS USUAL."

10. ALTERNATE COMMUNICATIONS:

CUSTOMERS: WE CURRENTLY COMMUNICATE WITH CUSTOMERS VIA THE TELEPHONE AND U.S. MAIL. IN THE EVENT OF AN SBD, WE WILL USE WHATEVER ALTERNATE MEANS OF COMMUNICATION ARE AVAILABLE.

EMPLOYEE/REPRESENTATIVES: WE CURRENTLY COMMUNICATE WITH REPRESENTATIVES VIA THE TELEPHONE, EMAIL AND U.S. MAIL. SHOULD THE NEED ARISE TO CONTACT THESE PERSONS DURING AN SBD, WHATEVER ALTERNATE FORM OF COMMUNICATION AVAILABLE WILL BE USED.

REGULATORS: CURRENT MEANS OF COMMUNICATION ARE THE INTERNET AND TELEPHONE. SHOULD AN SBD ARISE, WE WILL USE WHATEVER MEANS ARE AVAILABLE.

SCOTT ZOLLO SHALL BE THE FINRA AND MSRB CONTACT PERSON.
CELL (585) 415-0445.

BCP OCTOBER 2021**11. CRITICAL BUSINESS CONSTITUENTS AND BANKS:**

OUR FIRM BANK IS: CITIZENS BANK, WESTGATE OFFICE,
2042 CHILI AVE., ROCHESTER, NEW YORK. (585) 247-1000

OUR FIRMS HOLDS FUNDS IN: INVESCO GLOBAL STRATEGIC INCOME
CITIZENS BANK CHECKING ACCOUNT
TIAA MONEY MARKET ACCT.
FIDELITY ACCOUNTS
FOLIO ACCOUNTS

OPERATIONAL FUNDS ARE HELD IN THESE ACCOUNTS. IN THE EVENT OF AN SBD, ALL INSTITUTIONS WOULD BE CONTACTED AND ASSESSMENTS MADE AT THAT TIME.

**12. REGULATORY REPORTING: CONTACT: SCOTT ZOLLO
CELL (585) 415-0445**

THE FIRMS CURRENTLY USES THE INTERNET AND PAPER FILINGS VIA THE U.S. MAIL TO FILE QUARTERLY AND ANNUAL REPORTS. IN THE EVENT OF AN SBD, WE WILL TRY CONTACT OUR REGULATORS TO SEE WHAT MEANS WOULD BE AVAILABLE TO TRANSMIT ANY REPORTS. IF WE CANNOT CONTACT OUR REGULATORS, THEN WHATEVER MEANS ARE AVAILABLE WOULD BE USED.

13. DISCLOSURE OF BUSINESS CONTINUITY PLAN:

WE DISCLOSE A BRIEF SUMMARY OF OUR BCP IN OUR "WELCOME LETTER". THE LETTER IS SENT TO CLIENTS SHORTLY AFTER OPENING AN ACCOUNT WITH US. THE CLIENT CAN REQUEST A COPY OF THE BCP BE MAILED TO THEM.

THE FIRMS HAVE A BUSINESS CONTINUITY PLAN (BCP) IN PLACE THAT ADDRESSES EVENTS IN VARYING SCOP. IF THERE IS A BUSINESS DISRUPTION, IT WOULD TAKE APPROXIMATELY 24 HOURS TO SET UP IN THE NEW LOCATION. ALL RECORDS ARE BACKED UP BY IDRIVE AND STORED AT A DIFFERENT LOCATION, 15 MILES OR MORE FROM THE ROCHESTER OFFICE. IF THE BUSINESS NUMBER (585) 235-3600 BECOMES INOPERABLE, THE ALTERNATIVE NUMBER WOULD BE: (585) 415-0445. ALL CLIENT ASSETS AND RECORDS ARE

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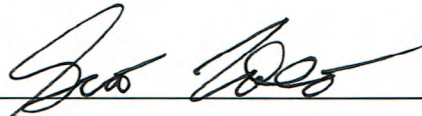
KEPT BY THE VARIOUS CUSTODIAN/FUND/ANNUITY COMPANIES, AND EACH HAS ITS OWN BCP PLAN.

14. UPDATE AND ANNUAL REVIEW:

OUR FIRMS SHALL UPDATE THIS PLAN AS NECESSARY IF THERE IS A CHANGE IN OPERATIONS, STRUCTURE, LOCATION OR PERSONNEL. THIS PLAN SHALL BE REVIEWED ANNUALLY IN OCTOBER.

15. SENIOR MANAGER APPROVAL:

I HAVE REVIEWED AND APPROVE THIS PRELIMINARY BUSINESS CONTINUITY PLAN DESIGNED AS A GUIDELINE TO ENABLE OUR FIRM TO MEET ITS OBLIGATIONS TO OUR CUSTOMERS IN THE EVENT OF AN SBD.

SIGNED:  _____

TITLE: PRINCIPAL

DATE: October 14, 2021