

Business Continuity Plan

Jersey Shore Financial Advisors LLC

March 15, 2017

I. Emergency Contact Persons

Our firm's two emergency contact persons are the Principal's wife, Kristi Penta at (732) 245-6467 and Certified Financial Planner™ and NAPFA member, Kelly L. Trageser at (732) 974-7400 or ktrageser@seaclearfinancial.com.

A. Death Or Incapacity of Investment Advisor

In the event of incapacity or death of Thomas J Duffy, the Principal of JSFA, clients should first contact Kristi Penta as stated above. In the event she deceases at that same time as Thomas J. Duffy CFP®, clients should contact Certified Financial Planner™ and NAPFA member, Kelly Trageser at (732) 974-7400 ktrageser@seaclearfinancial.com.

II. Firm Policy

Our firm'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 all of the firm'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 assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm'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 firms, 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 clearing firm.

B. Approval and Execution Authority

Thomas J. Duffy CFP®, a registered Principal, is responsible for approving the plan and for conducting the required annual review and has the authority to execute this BCP.

C. Plan Location and Access

Our firm 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 the JSFA OneDrive in the folder *Compliance/Business Continuity Plan*.

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

III. Business Description

Our firm conducts business in equity and fixed income securities. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only retail customers. We do not engage in any private placements.

Client assets may be held in custody at one of the following firms:

Pershing LLC
P.O. Box 2065
Jersey City, New Jersey 07303-2065
www.pershing.com
Tel: (201) 413-3635
Fax: (213) 624-6100

Jefferson National Life
9920 Corporate Campus Dr
Suite 1000
Louisville, KY 40223
Tel: (866) 667-0564
Fax: (866) 667-0563

AssetMark Financial Trust Company
3200 N. Central Avenue, 7th Floor
Phoenix, AZ 85012
Tel: 800 664.5345
Fax: 602 277.0202

TD Ameritrade
801 Mesquite Bend Drive, Suite 112,
Irving TX, 75063-6043
Tel: 800-431-3500

In the event Thomas J Duffy, CFP®. MBA is unreachable clients should contact their custodian for instructions on how it may assist you in gaining access to your accounts.

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

IV. Office Locations

Our firm has offices located in Location #1 and Location #2.

A. Office Location #1

Our Location #1 Office is located at 55 Gilbert Street N, Suite 3103, Tinton Falls, NJ 07724. Its main telephone number is (732) 229-7489. JSFA has no employees at this location. We engage in meeting prospective clients and existing clients at this location. Financial planning and investment management activities are engaged in at this location

B. Office Location #2

Our Location #2 Office is located at 46 Mohican Avenue. Its main telephone number is 732-229-7489. There are no employees here other than the Principal, Thomas j Duffy, CFP®, MBA. He engages in financial planning and investment management activities (no client meetings) at this location.



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

V. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at one of the firms indicated above. In the event of an internal or external SBD, if telephone service is available, clients should contact the appropriate custodian as indicated above.

If 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.

VI. Data Back-Up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary hard copy books and records and its electronic records at 46 Mohican Avenue, Oceanport, NJ 07757. Thomas J Duffy, CFP®, MBA at (732) 229-7489 is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm: word documents and excel spreadsheets.

Our firm maintains electronic copies of books and records at www.skydrive.com. These records are stored off site electronically at www.onedrive.com and is responsible for the maintenance of these back-up books and records. Our firm backs up its paper records by copying and taking them to our back-up site. We back up our records every day.

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).





VII. 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. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include *our website, telephone voice mail, secure email, etc.* In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

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 our clearing firm, 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 appropriate steps.

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

VIII. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate communication via e-mail and or telephone, access to client information via Internet.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of communication. Our clearing firm provides, through contract, 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.



Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote [or, *preferably*, out of region] site. Our clearing firm 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. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing[, and it has confirmed that it tests its back-up arrangements every *time period*].

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. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of [e.g., *within 4 hours*]; and resumption time of [e.g., *within the same business day*].

Thomas j Duffy, CFP®, MBA, the firm’s Principal will periodically review our clearing firm’s capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

A. Our Firm’s Mission Critical Systems

1. Order Taking

N/A.

2. Order Entry

N/A





3. Order Execution

N/A

4. Other Services Currently Provided to Customers

In addition to Investment Management Services, JSFA provides Financial Planning Services. In the event of an internal SBD, we would

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order execution, customer account maintenance, and delivery of statements.

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

IX. 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 firm. 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

JSFA does not have any employees.

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

C. Regulators





We are currently regulated by the State of New Jersey Bureau of Securities. We communicate with our regulators using the *telephone, email, fax, and U.S. mail*. 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).

X. Critical Business Constituents, Banks, and Counter-Parties

A. Business constituents

JSFA does not have any critical business constituents.

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

B. Banks

JSFA does not have any financing relationships with banks.

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

C. Counter-Parties

JSFA does not have any counterparties.

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

XI. Regulatory Reporting

Our firm is subject to regulation by the State of New Jersey. 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. There phone number is (973) 504-3600 www.njconsumeraffairs.gov.



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

XII. Disclosure of Business Continuity Plan

Attached is our written BCP disclosure statement we provide customers at account opening. We also mail it to customers upon request.

Rule: FINRA Rule 4370(e).

XIII. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually, on March 15th, to modify it for any changes in our operations, structure, business or location or those of our clearing firm.

Rule: FINRA Rule 4370(b).

XIV. Senior Manager Approval

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

Rule: FINRA Rule 4370(d).

Signed: _____ Thomas j Duffy, CFP®, MBA® _____

Title: _____ Principal _____

Date: _____ March 15, 2017 _____



Attachment A to Jersey Shore Financial Advisors, LLC Business Continuity Plan

Business Continuity

Jersey Shore Financial Advisors LLC (JSFA) has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (732) 229-7489 or via e-mail: info@jerseyshorefa.com, you should call our alternative number (732) 229-1760 or go to our web site at www.jerseyshorefa.com.

If you cannot access us through either of those means, you should contact the custodian where your investment accounts are held:

Pershing LLC
P.O. Box 2065
Jersey City, New Jersey 07303-2065
www.pershing.com
Tel: (201) 413-3635
Fax: (213) 624-6100

Jefferson National Life
9920 Corporate Campus Dr
Suite 1000
Louisville, KY 40223
Tel: (866) 667-0564
Fax: (866) 667-0563

Genworth Financial Trust Company
3200 N. Central Avenue, 7th Floor
Phoenix, AZ 85012
Tel: 800 664.5345
Fax: 602 277.0202

TD Ameritrade
801 Mesquite Bend Drive, Suite 112,
Irving TX, 75063-6043
Tel: 800-431-3500

for instructions on how it may assist you in gaining access to your accounts.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.



Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our custodial firms, Jefferson National and/or Pershing, normally perform data protection and back up of your important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a reasonable time period subject to the scope and severity of the business disruption. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 48 hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 5-7 days. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site www.jerseyshorefa.com or our customer emergency number, 732-229 -1760 how to contact us.

If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us via telephone (732) 229-7489 or e-mail info@jerseyshorefa.com.