



VERITY ASSET MANAGEMENT

Business Continuity Plan

(Amended 9/30/2022)



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I. EMERGENCY CONTACT PERSONS

The Firm's two emergency contact persons are:

Gordon T. Wegwart

President and Chief Compliance Officer

Amy L. Simonson

Vice President for Operations and Finance

These names will be updated in the event of a material change.

II. FIRM POLICY

The Firm's policy is to respond to a significant business disruption 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 customers to transact business. It is the Firm's intent to continue to conduct business in the event of a business disruption; however, circumstances may render the continuity of normal operations impracticable. If the Firm is unable to continue business operations, clients will continue to have direct access to their funds and securities via their respective custodians.

A. Significant Business Disruptions

This plan anticipates two kinds of significant business disruptions, internal and external. Internal significant business disruptions affect only The Firm's ability to communicate and do business, such as a fire in the building. External significant business disruptions prevent the operation of the securities markets or several firms, such as a terrorist attack, a city flood, a pandemic, or a wide-scale, regional disruption. The Firm's response to both types of significant business disruptions may rely heavily on other organizations and systems, especially the capabilities of custodian(s) or the issuers of securities products.

B. Approval and Review

Gordon T. Wegwart, Chief Compliance Officer, is responsible for approving this plan and conducting the annual review.

C. Plan Location and Access

The Firm will maintain physical copies of its current Business Continuity Plan (BCP) and all prior versions for a period of at least five years, along with the results of annual reviews. An

electronic copy of the plan is located on the “Advisor Workplace” section of the website for access by all internal personnel and on an internal server. Additionally, the plan is stored in the Firm’s Compliance platform hosted by MyComplianceOffice (MCO).

D. Disaster Recovery

The Firm’s disaster recovery and business continuity plans use work from home as integral to its ability to continue to serve its clients. Employees are provided with technological solutions to facilitate efficient and seamless transition to and from the office to work from home. Employees already telework one or more days each week during normal times. In the event employees are not able to enter to the office building, all employees are able to work from home with little loss of productivity or the ability to communicate with each other and any clients.

The Firm uses a combination of cross training and procedural documentation to ensure the continuity of the various critical and functional business processes in the event of a loss of a principal or subject matter expert. Designated backup personnel have access to these records and will be tasked with their respective responsibilities immediately, including the supervising of employees.

Most of the Firm’s products and services are accessed over the internet and will function regardless of any temporary disruption. The Firm uses a variety of software applications. Depending on the application, this software resides in either the public cloud or a private cloud and is available to Firm employees both in the office and away from the office. All data is backed up as per the section below.

Cyber security is a serious risk and is pervasive across all industries. The Firm utilizes modern versions of software and diligently applies security updates as soon as possible after they are released. The Firm employs appropriate firewalls and virus protection software and has taken steps to segregate and protect data within the Firm’s network. The Firm also uses periodic online trainings to educate employees and associated persons on cyber threats and best practices to mitigate the risk of intrusions and data breaches.

III. BUSINESS DESCRIPTION

The Firm provides fee-based investment advisory services and related consulting services. The Firm does not hold customer funds or securities. The custodian(s) for the investment advisory services maintains the customers’ accounts, communicates directly with customers via account statements and other means, provides customers access to their account information, and delivers funds and securities.

IV. OFFICE LOCATIONS

The Firm's offices are in the following locations:

Please note that all locations accept written Investment Advisory Agreements and New Account Agreements.

A. Durham, NC

The Firm's home office is located at:

280 S MANGUM ST STE 550

DURHAM NC 27701-3683

Phone 919-490-6717

B. Scottsdale, AZ

The Firm's Scottsdale office is located at:

17550 N PERIMETER DR STE 300

SCOTTSDALE AZ 85255-7836

Phone: 800-684-2685

C. Oakdale, CA – 210

The Firm's Oakdale – 210 office is located at:

210 S SIERRA AVE STE 106

OAKDALE CA 95361-4212

Phone 916-719-6644

D. Oakdale, CA – 213

The Firm's Oakdale – 213 office is located at:

213 S SIERRA AVE

OAKDALE CA 95361-4013

Phone 209-322-1878

E. Pleasanton, CA

The Firm's Pleasanton office is located at:

4625 1ST ST STE 240

PLEASANTON CA 94566-7168

Phone 925-398-3402

F. Stockton, CA

The Firm's Stockton office is located at:

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8807 THORNTON RD STE M
STOCKTON CA 95209-1863
Phone 209-277-5008

G. Tallahassee, FL

The Firm's Tallahassee office is located at:
2010 RAYMOND DIEHL RD STE 102
TALLAHASSEE FL 32308-3880
Phone 850-385-3578

H. Carrboro, NC

The Firm's Carrboro office is located at:
205 HILLSBOROUGH RD
CARRBORO NC 27510-1333
Phone 919-942-2428

I. Wilmington, NC

The Firm's Wilmington office is located at:
701 N 4TH ST
WILMINGTON NC 28401-3415
Phone 910-262-6203

J. Ronkonkoma, NY

The Firm's Ronkonkoma office is located at:
3075 VETERANS MEMORIAL HWY STE 130
RONKONKOMA NY 11779-7600
Phone 631-605-8400

K. Monroeville, PA

The Firm's Monroeville office is located at:
4099 WILLIAM PENN HWY STE 401
MONROEVILLE PA 15146-2514
Phone 800-491-7005

L. Greensburg, PA

The Firm's Greensburg office is located at:
1602 BROAD ST STE B
GREENSBURG PA 15601-5478
Phone 724-837-9300

M. Wyomissing, PA

The Firm's Wyomissing office is located at:
928 PENN AVE
WYOMISSING PA 19610-3017
Phone 610-816-7297

N. Keller, TX

The Firm's Keller office is located at:
8841 DAVID BLVD STE 200
KELLER TX 76248-0398
Phone: 214-677-0201

O. Blacksburg, VA

The Firm's Blacksburg office is located at:
119 CHURCH ST NE # 100
BLACKSBURG VA 24060-3922
Phone 540-443-3612

V. ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

In the event of a significant business disruption, the Firm may move critical staff from affected offices to one of the closest unaffected office locations. Alternatively, or if none of the other office locations is best equipped to receive those staff, the Firm may move operations on a temporary basis to:

1828 SPRING OVERLOOK LN
HILLSBOROUGH, NC 27278-0530
Phone 919-493-6253

The Firm may choose to move to another location appropriately located and equipped with phone and internet service and effectively continue operations. If needed, the Firm will then promptly locate alternate office space until such time as the permanent office location is again operational.

Additionally, nearly the entire staff is equipped to operate with close to full efficiency and connectivity from home or other remote locations, so there is considerable flexibility in response to a variety of specific conditions.

In the event the Firm must temporarily vacate the main office, the Firm will monitor conditions at the main location in the American Tobacco Campus (ATC) in Durham, N.C. by periodically contacting ATC Security at 919-433-1567.

VI. CUSTOMERS ACCESS TO FUNDS AND SECURITIES

The Firm does not maintain custody of customers' funds or securities. Custody is maintained by the respective custodians. If the Firm is unable to continue business, clients will continue to have direct access to their funds and securities via their respective custodians. During a significant business disruption, if phone service is available, Firm registered persons will be able to communicate with customers and forward instructions to the respective custodians on their behalf or refer customers directly to the customer service lines of the custodians as may be appropriate. If web access is available, the Firm will post on the website alternate contact information along with the fact that customers may access their funds and securities by contacting their respective custodians. The Firm also makes this information available to customers through its disclosure policy.

VII. DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)

The Firm maintains its primary hard copy books and records at the home office at:

280 S MANGUM ST STE 550
DURHAM NC 27701-3683
Phone 800-247-6717

Additionally, the Firm has executed industry arrangements for certain books and records to be stored with the following third-party vendors: ReadyDoc LLC, Docupace Technologies LLC, MyComplianceOffice Ltd, MirrorWeb Ltd, and Global Relay Communications Inc.

Amy L. Simonson, Vice President for Operations and Finance and Jeffrey A. Munsey, Vice President and CIO, are responsible for the maintenance of these books and records.

The Firm backs up its records, consisting of client account applications and servicing documents, by scanning (if received in paper format) or importing electronic records into an online document management system called ReadyDoc. Amy L. Simonson is responsible for the maintenance of these back-up books and records.

The Firm backs up its server daily using VEEAM Backup and Replication software. Note: The Firm performs full server backups as opposed to file-based backup. The backups are sent to a locally managed enclosed storage array using RAID 5 which allows a single drive failure to be easily swapped out and replaced. The backups are encrypted with AES-256. The encrypted daily backups are transmitted offsite to Droege Computing Servers where 7 days of backups are stored. All internal server drives are setup with RAID so that all data is written to 2 drives. Should an internal drive fail, the system can run from the internal backup RAID drive. Should a double fault scenario occur in which multiple internal drives are impacted, the recovery time would be less than a day.

Duplicate copies of all customer account records, if needed, are available through the respective custodians.

In the event of an internal or external signification business disruption that causes the loss of paper records, the Firm will access the electronic records from the cloud-based document repository.

For the loss of electronic records, the Firm will either physically recover the storage media or electronically recover data from the back-up.

VIII. FINANCIAL AND OPERATIONAL ASSESSMENTS

A. Operational Risk

In the event of a significant business disruption, the Firm will immediately identify what means will permit communication with its customers, employees, critical business constituents, banks, critical counterparties, and regulators. In the event of a technical failure of the primary phone system, the service provider can invoke a “remote call forwarding” feature to forward incoming calls to either an alternate business location or to a designated cell phone. Incoming faxes are handled via eFax and are therefore accessible from any location. Corporate email is hosted externally with Microsoft Office 365 Business Essentials. The email is archived with Global Relay. All emails and archived emails can be accessed directly by the host provider via internet connection. The Firm will retrieve any additional records as described in the section above, Data Backup and Recovery (Hard Copy and Electronic). Client accounts and order entry capabilities at the

custodian(s) are all accessible over the internet, or, if necessary, by phone. If needed, physical mail and express mail delivery can be directed to an alternate location.

B. Financial and Credit Risk

In the event of a significant business disruption, the Firm will determine the value and liquidity of its assets to evaluate its ability to continue to fund operations. The Firm will contact its insurance carriers with claims, where applicable, its banks and investors to apprise them of the financial status, and if it is determined that the Firm may be unable to meet its obligations to those counterparties or otherwise continue to fund its operations, the Firm will request additional financing from the bank or other credit sources to fulfill its obligations to the clients. If the Firm cannot remedy a capital deficiency, it will file appropriate notices with the regulators and immediately take appropriate steps, including notification to customers.

IX. MISSION CRITICAL SYSTEMS

The Firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions. While the Firm has primary responsibility for establishing and maintaining business relationships with its customers, the Firm has sole responsibility for taking written applications for advisory services and entry of purchase and sale orders with investment advisory custodian(s). The custodians provide, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, delivery of customer account statements, and the delivery of funds and securities.

A. Firm Mission Critical Systems

Currently, the Firm receives written applications from customers in-person, electronically, and by physical mail. During a significant business disruption, the Firm will continue to take applications through any of these methods and, as communications permit, will inform customers of any alternatives by postings on the Verity website and messages on the phone system. To the extent feasible, the Firm will also attempt to communicate to clients via email. If the phone service provider is operational, it will be instructed to activate the "remote call forwarding" feature to forward incoming calls to an alternate number (either an alternate office location or a cell phone) where clients and others may leave messages for or communicate directly with company representatives. If necessary, the Firm will advise its customers to forward applications directly to the respective issuers or custodians.

The following systems are considered to be mission critical systems:

1. Telephone Systems:

Phone System: Digium Switchvox310 Appliance

Backup System: Cellular phones (Verizon Wireless)

The Digium Switchvox is a locally managed VOIP phone system that utilizes BCM One for its SIP trunks. This service rides over a 100M fiber circuit provided by CenturyLink. If the phone system fails, "remote call forwarding" will be used to route incoming calls to a designated cellular telephone number.

2. Computer Systems for Internal Operations

MICROSOFT NETWORK

Windows Server 2016 Standard:

Server configuration / components / software

Running HyperV with 3 virtual machines (Verity0, Verity2, RDServer)

All virtual machines have RAID mirrored hard drives

HyperV Virtual Machine Manager

Veeam Backup

Verity0 Virtual Machine

Active Directory Domain Services

Terminal Server

File Server

Web Services (IIS)

Peachtree Accounting

Verity2 Virtual Machine

Web Services (IIS)

Middleware

Security Server

Remote Desktop gateway (DUO)

RD Server Virtual Machine

Remote Desktop Services

All Virtual Machines on Raid 10

Veeam Backup Server

Windows10 /7 Professional Desktop Operating Systems

Internet / Firewall

Watchguard M370 (primary router)

Watchguard XTM330 (backup & internet browsing risk mgmt.)

CenturyLink (primary internet connection and phone service)

TimeWarner (backup internet connection)

Back-up Power

APC Smart-UPS 3000XL

Back-up Enclosure

RocketRAID 2681

4 x 3TB Toshiba Drives

Raid 5 configuration

Hot Swappable

The Firm's backup system performs full server backups using incrementals each evening at 8:00pm. The backups are encrypted and transferred to Droege Computing which supports 7 days of storage.

The Firm's information systems are designed, built, and supported by internal staff and external network support personnel. Issues with the systems can be resolved generally within one business day.

Access to the server is secured by user ID and password.

All workstations have similar hardware (PC based) and software (Windows). Critical Workstations have SSD drives to reduce probability of a hard drive failure incident. In case of a user workstation failure, the Firm has additional "low use" computers that could be redeployed to meet an urgent need.

B. Mission Critical Systems Provided by Issuers and Custodians

The Firm relies, by contract, on custodians to provide order execution, order comparison, order allocation, the maintenance of customer accounts, delivery of funds and securities, delivery of customer account statements, and access to customer accounts. The Firm's custodians are similarly required to maintain Business Continuity Plans which 1) provide for these same contingencies as they relate to their unique responsibilities for mission critical systems and 2) that they maintain BCPs reasonably designed to assure their ability to deal with significant business disruptions.

Although there are certain mission critical systems which are impossible to implement in the absence of these custodians, including but not limited to order entry, order execution, and delivery of funds and securities, the Firm endeavors, to the extent feasible, to maintain

accurate customer account records and will provide access to those records by customers in the event of a significant business disruption affecting one of the issuers or custodians. For all direct investment advisory accounts, this will consist of records of all quarterly account statements maintained either physically, on compact disk, or on independent hard drives.

A list of contact information for select custodians is contained in Attachment A.

X. ALTERNATE COMMUNICATIONS BETWEEN THE FIRM AND CUSTOMERS, EMPLOYEES, AND REGULATORS

A. Customers

The Firm communicates with its customers using the phone, email, the Verity website, fax, U.S. mail, and in-person visits at the main office, branch offices, or the customer's location. In the event of a significant business disruption, the Firm will assess which means of communication are still available and use the means closest in speed to that which is used under normal circumstances.

B. Employees

The Firm communicates with its employees using the phone, email, the website, and in-person. In the event of a significant business disruption, the Firm will assess which means of communication are still available and use the means closest in speed to that which is used under normal circumstances. The Firm will also employ a call tree so that senior management can reach all employees quickly during a significant business disruption. The call tree is exhibited below. All contact information, including addresses and phone numbers, are contained in Attachment B. This information is available to each employee, and they are instructed to store the roster in a secure, off-site location.

The person to invoke use of the call tree is Amy L. Simonson. If Ms. Simonson or any other assigned caller is unavailable, a member of senior management will reallocate the affected recipients.

Caller	Call Recipients	
Al Otto	Jae Di Lorenzo	Robert McLean

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	Jennifer Dillon	
Amy Simonson	Bill Hopwood Jeffrey Munsey Karina Mejia Michael Hazen	Gail Bartley Gloria Solano Gordon Wegwart Sean McGill
Bill Hopwood	Amy Lindros Kurt Preble	Gretchen Stroemer Lorren Bryant
Daniel Krause	Conrad Walker David Cox Eric Anderson Erik NeVille Frederick Osmond Galen Wildeman Gary D'Alessio	John Davis KC Trace Luciun Lovick Nickolas Moes Stephanie Vejar Todd Steck Vickie Mach
Erik Neville	Beatriz Cisneros-Piz Krystal Vargas	Janet Nunez Stacy Cisneros
Greg Komsky	Heather Baker	
Gordon Wegwart	Al Otto Amy Simonson Brad Corbett Brian Kurtzer Malcolm Trevillian	Neal Huggins Steve Lewis Sujatha Avutu Troy Dryer
Jeffrey Munsey	Alexander Munsey Dean Jackson Mike DeCamillis	Peter Hynes Peter Klas
Lorren Bryant	Greg Herman-Giddens	Linda Noblit
Neal Huggins	Chris Bolles	Mike Timofeeff
Ray Menna	Jackie Menna Rachel Menna	Richard Cecchi Sarah Baldassari
Ron Gibbs	John Rudd	
Sean McGill	Brian Shelton Daniel Krause Ellen Bailey Gianna Campo Greg Komsky Jeffrey Potter	Joselyn Sicuro Kurt Hollar Ray Menna Ronald Gibbs William Durham
William Durham	Christopher Harrison	Ron Somers

C. Regulators

The Firm is subject to regulation by the SEC and various state authorities. The Firm communicates with the regulators using the phone, email, fax, U.S. mail, and in-person. The

Firm files reports using paper copies in the U.S. mail, and electronically using fax, email, and the internet. Access to automated regulatory reporting systems can be gained from any computer that has internet access. In the event of a significant business disruption, The Firm will check with the SEC and any other regulatory agencies to determine and utilize which means of communication and filing are still available. Regulatory contact information, including system login information, is contained in Attachment C.

D. Investment Advisory Relationships

The Firm communicates with solicitor firms, sub-advisors, and other investment advisers with whom the Firm has business relationships using the phone, email, web interface, and in-person. In the event of a significant business disruption, the Firm will assess which means of communication are still available and use the means closest in speed to that which is used under normal circumstances. All contact information, including addresses and phone numbers, are contained in Attachment D.

XI. SUBSTITUTION OF KEY PERSONNEL

In the event that one or more key personnel are not available to act in their normal capacity as a result of a business disruption or other event, the following substations of roles may be implemented:

President	Amy Simonson or Jeff Munsey
Financial Operations	Jeff Munsey
General Operations	Jeff Munsey
Sales Management	Gordon Wegwart
Chief Compliance Officer	Michael Hazen
AML Compliance Officer	Michael Hazen
Chief Information Officer	Amy Simonson

XII. CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTERPARTIES

A. Business constituents

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The Firm has critical business constituents (businesses with which the Firm has an ongoing commercial relationship in support of its operating activities) and can continue its business relationship with them in case of an internal or external significant business disruption. The Firm will work to quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when needed due to a significant business disruption:

Advisors Assistant (Client Marketing Systems)

<https://advisorsassistant.com/>

12395 WORLD TRADE DR # 200

SAN DIEGO CA 92128-3743

Phone 800-643-4488

ReadyDoc (Document Storage)

<http://readydoc.com/>

5526 VISTA TERRACE LN

SPARKS NV 89436-7690

Phone 855-879-7323 ext. 701

Droege Computing Services (Hardware Support and Backup Storage)

<http://www.droegecomputing.com/dcsprod.htm/>

20 W COLONY PL STE 120

DURHAM NC 27705-5520

Phone 919-403-9459

Or James Matthews cell 919-451-8966

Global Relay (Email Backup)

<https://www.globalrelay.com/>

121 W WACKER DR 33RD FLOOR

CHICAGO IL 60601-1781

Phone 866-484-6630

CenturyLink (Phone and Internet Service Provider – HQ)

<https://www.centurylink.com/small-business/support/contact-us.html/>

100 CENTURYLINK DR

MONROE LA 71203-2041

Phone 877.726.6875

Orion Adviser Services (Data Aggregation)

<https://orion.com/>

17605 WRIGHT ST

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OMAHA NE 68130-2095

Phone 877-304-3611

Microsoft Office 365 (Email Provider)

<https://support.microsoft.com/en-us/>

1 MICROSOFT WAY

REDMOND WA 98052-8300

Phone 425-882-8080

Or 800-865-9408

Citrix Podio (Operational Processes)

<https://workflow-automation.podio.com/>

120 S WEST ST

RALEIGH NC 27603-1834

Phone 800-441-3453

BCM One (Phone Service – HQ)

<https://www.bcmone.com/>

295 MADISON AVE FL 5

NEW YORK NY 10017-7733

Phone 888-543-2000

Docupace Technologies (Billing)

<https://www.jaccomo.com/>

400 CORPORATE POINTE STE 300

CULVER CITY CA 90230-7620

Phone 310-445-7722

MyComplianceOffice (Compliance Books & Records)

<https://mco.mycomplianceoffice.com/>

535 5TH AVE FL 4

NEW YORK NY 10017-8020

Phone 866-951-2280

MirrorWeb (Website and Social Media Archiving)

<https://www.mirrorweb.com/>

77-89 BRIDGE ST

MANCHESTER UK M3 2RF

Phone: 44 800 222 9200

B. Banks

The Firm maintains a banking relationship with Pinnacle Bank. The primary location with which the Firm conducts business is:

The Durham Branch
<https://www.pnfp.com/>
280 S MANGUM ST STE 140
DURHAM NC 27701-3673
Phone 919-383-4200

In the event of a disruption, the Firm will utilize one of their other branches in various locations in North Carolina including the following:

The Chapel Hill Farrington Road Branch
5925 FARRINGTON RD
CHAPEL HILL NC 27517-8607
Phone 919-969-2578

The Raleigh Falls of Neuse Branch
4525 FALLS OF NEUSE RD
RALEIGH NC 27609-6203
Phone 919-232-6820

C. Counterparties

The Firm's critical counterparties are the investment advisory custodians: Axos Advisor Services, Fidelity Investments, Charles Schwab and Co., FPS Services, and other custodians for employer plans in which we provide investment management to participants, including TIAA-CREF. Contact information for each is in Attachment A. The Firm will act promptly to establish communication via the phone, email, and/or web interface in the event of any business disruption to maintaining the ability to provide trading instructions.

XIII. DISCLOSURE OF BUSINESS CONTINUITY PLAN

The Firm provides in writing a BCP disclosure statement to customers at account opening. The Firm also posts the disclosure statement on the Verity website and mails it to customers upon request. The current disclosure statement is as follows:

Verity Asset Management maintains a plan designed to assure continuation of business in the event of disruptions of varying severity. Client account records are maintained by the custodians, and thus account records and customer funds should be accessible in the normal manner from those sources. All internal electronic records, including financial records, are backed up in a secure manner off-site. Should any disruption occur, whether it is confined to our home office or is citywide or regional in scope, Verity intends to resume operations within twenty-four hours. Inbound phone

lines will be forwarded to alternate numbers, and email correspondence will be monitored from an alternate location. (You may contact us at compliance@verityinvest.com.) Updated status and contact information will be posted on our website at www.verityinvest.com. Updates to this summary will be posted on our website and are available by mail upon request.

XIV. TRAINING

New personnel are trained as appropriate to their roles during their orientation process. For registered personnel, this is a component of their compliance orientation. Annual training for all personnel will take place as part of the firm's mandatory Annual Compliance Meeting, with content and attendance documented.

XV. TESTING

As previously noted, primary client account records and all client securities are maintained at outside custodians and asset managers. The Firm relies on these third parties to perform certain functions on its behalf, and the ability to respond to certain business disruptions is partially dependent upon these firms. The Firm's locations and equipment are generally capable of being reconfigured in response to a disruption of business in a manner enabling business continuity until normal functionality is restored. As a result of these factors, the risk level for the Firm's business model is relatively low.

Testing is conducted each year in conjunction with the firm's supervisory control procedures testing, typically conducted in March. Testing is documented, and any corrective action is scheduled by the Chief Compliance Officer. An annual orientation is conducted as part of the firm's Annual Compliance Meeting to assure that all personnel understand and are prepared to implement their respective roles.

XVI. UPDATES AND ANNUAL REVIEW

The Firm will update this plan discretionarily and whenever it has a material change to its operations, structure, business, or location. In addition, the Firm reviews this BCP annually, typically by October 1. Amendments and corrective action identified as part of the testing and review processes are implemented and confirmed under the supervision of the Chief Compliance Officer.

XVII. SENIOR MANAGER APPROVAL

I have approved this Business Continuity Plan as reasonably designed to enable the Firm to meet its obligations to customers in the event of a significant business disruption.

Rule: FINRA Rule 3510(d).

Signed: _____

Title: President

Date: _____

APPENDIX

Attachment A – Select Custodians (attached)

Attachment B – Employee Phonebook (attached)

Attachment C – Regulatory Authorities (attached)

Attachment D – Solicitor Firms, Sub-Advisors, & IA Firms (attached)

Select Custodians:

AXOS Clearing, LLC

AXOS Advisor Services

<https://www.axosadvisorservices.com/>

1299 FARNAM ST STE 800

OMAHA NE 68102-1916

Phone 303-705-6408

Or 866-776-0218

Fidelity Investments

Fidelity Wealth Advisor Solutions

<https://fiws.fidelity.com/>

500 SALEM ST

SMITHFIELD RI 02917-1288

Phone 800-523-1203

Or 800-735-3756

Charles Schwab & Co., Inc.

Charles Schwab Advisor Services

<https://advisorservices.schwab.com/>

8040 S 48TH ST

PHOENIX AZ 85044-5306

Phone 877-774-3892

or 800-647-5465

FPS Services, LLC

Investment Provider Xchange – IPX Retirement

<https://www.ipxretirement.com/>

9200 E MINERAL AVE STE 225

CENTENNIAL CO 80112-3592

Phone 888-505-3759

Or 844-788-3474

TIAA-CREF Individual & Institutional Services, LLC

TIAA-CREF Advisor Services

<https://auth.tiaa.org/public/authentication/securelogin/>

8500 ANDREW CARNEGIE BLVD

CHARLOTTE NC 28262-8500

Phone 704.988.6916

Or 888-842-0318

Phone Book Report

Name	Primary Address	Pr. Number	Phones Type	Contact
A				
Alguire, Amber E Employee	Amber E Alguire 2516 Rocks Road Forest Hill, MD 21050	<input checked="" type="checkbox"/> (443) 987-3221	Home	Amber Alguire
Anderson, Catherine Employee Advisory Client	Catherine Anderson 137 N Village Circle Palmyra, PA 17078	<input checked="" type="checkbox"/> (814) 3815667	Home	Catherine Anderson
Anderson, Eric L Employee Advisory Client	Eric L Anderson 12026 Pecan Avenue Waterford, CA 95386	<input checked="" type="checkbox"/> (209) 840-0501 <input type="checkbox"/> (800) 474-1440	Home Business	Eric L Anderson
B				
Bacon, Scott L Employee	Scott L Bacon Advisor 2120 Dame Shirley Way Gold River, CA 95670	<input checked="" type="checkbox"/> (916) 330-4066	Home	Scott L Bacon
Bailey, Ellen Employee Advisory Client	Ellen Bailey 3312 Old Saybrook Court Raleigh, NC 27612	<input checked="" type="checkbox"/> (919) 8093424	Home	Ellen Bailey
Barbour, Joseph Employee	Joseph Barbour Advisor 11010 Rosewood Ct. La Porte, TX 77571	<input checked="" type="checkbox"/> (281) 748-0665	Home	Joseph Barbour
Bartley, Gail Employee	Gail Bartley 6378 Bryson Drive SW Ocean Isle Beach, NC 28469	<input checked="" type="checkbox"/> (336) 639-9532	Cell	
Bolles, Christopher C Employee	Christopher C Bolles 3010 Rachel Pl Wilmington, NC 28409-2067	<input checked="" type="checkbox"/> (910) 264-5939 <input type="checkbox"/> (910) 452-5275 <input type="checkbox"/> (919) 490-6717 130	Cell Home Business	
Bryant, CFP, Lorren M Employee Advisory Client	Lorren M. Bryant PO Box 1411 Carrboro, NC 27510	<input checked="" type="checkbox"/> (919) 923-1333 <input type="checkbox"/> (919) 942-2428 <input type="checkbox"/> (800) 247-6717 144	Cell Business Business	
C				
Cecchi, Richard Employee	Richard Cecchi 24 Christopher Court Babylon, NY 11702-3702	<input checked="" type="checkbox"/> (631) 943-5739	Home	Richard Cecchi
Chatto, Christopher M Employee	Christopher M Chatto 26 Millbrook Court Danville, CA 94526	<input checked="" type="checkbox"/> (916) 879-1912 <input type="checkbox"/> (916) 879-1912	Home Business	Christopher M Chatto
Ciesielka, Amy L Employee	Amy Lauren Ciesielka Advisor 1518 NE 73rd Ave Portland, OR 97213	<input checked="" type="checkbox"/> (503) 265-9325	Home	Amy Lauren Ciesielka
Comer, Micah Employee	Micah Comer 3724 Abby Court Rocklin, CA 95765-4654	<input checked="" type="checkbox"/> (949) 933-5499	Home	Micah Comer

Phone Book Report

Name	Primary Address	Pr. Number	Phones Type	Contact
C				
Corbett, Brad N Employee	Brad N Corbett 3811 Dunsinane Drive Durham, NC 27707	<input checked="" type="checkbox"/> (919) 360-8887 <input type="checkbox"/> (919) 490-6717 121	Cell / Mobile Business	
Cox, David Employee	David Cox 8207 Canoga Ave #35 Austin, TX 78724	<input checked="" type="checkbox"/> (281) 253-8576	Home	David Cox
D				
D'Alessio, Gary L Employee Advisory Client	Gary L D'Alessio 38 Glacier Drive Berlin, NJ 08009	<input checked="" type="checkbox"/> (609) 618-9006	Home	Gary L D'Alessio
Davis, John G Employee	John Glenn Davis 7117 Liverpool Lane Roseville, CA 95747	<input checked="" type="checkbox"/> (916) 945-6388	Home	
DeCamillis, Michael L Employee Advisory Client	Michael L. DeCamillis 1307 Antler Point Drive Durham, NC 27713	<input checked="" type="checkbox"/> (919) 810-1637 <input type="checkbox"/> (919) 490-6717 122	Cell Business	
Durham, William M Employee Trusted Contact Person	William M Durham 2181 Raymond Diehl Rd. Tallahassee, FL 32308	<input checked="" type="checkbox"/> (850) 5664306	Home	William M Durham
G				
Garcia, Gerardo Employee	Gerardo Garcia 5222 Cosumnes Dr Apt. 205 Stockton, CA 95219	<input checked="" type="checkbox"/> (209) 4018481	Home	Gerardo Garcia
Gibbs, Ronald W Employee Advisory Client	Ronald W. Gibbs Ronald W & Caroline B Gibbs 1500 Palmer Dr Blacksburg, VA 24060	<input checked="" type="checkbox"/> (540) 443-3612 <input type="checkbox"/> (540) 953-2537 <input type="checkbox"/> (540) 449-1767	Business Home Cell	
Gligora, Shannon N Employee	Shannon Nicole Gligora 5925 Lakemont Dr Westerville, OH 43081	<input checked="" type="checkbox"/> (614) 599-2504 <input type="checkbox"/> (614) 599-2504	Business Home	Shannon Gligora
H				
Harrison, Christopher Employee	Christopher Harrison Advisor 2580 Centerville Ct Tallahassee, FL 32308	<input checked="" type="checkbox"/> (770) 7156707	Home	Christopher Harrison
Hazen, Michael Employee	Michael Hazen Verity Compliance Operations Manager 280 S. Mangum Street, Suite 550 Durham, NC 27701	<input checked="" type="checkbox"/> (919) 490-6717 117	Business	
Hefter, Steven J Employee	Steven Hefter Advisor 2818 Floral Dr. Northbrook, IL 60062	<input checked="" type="checkbox"/> (847) 5421183	Home	Steven Hefter

Phone Book Report

Name	Primary Address	Pr. Number	Phones Type	Contact
H				
Herman-Giddens, Gregory Employee Advisory Client	Gregory Herman-Giddens 5087 Andros Drive Naples, FL 34113	<input checked="" type="checkbox"/> (919) 636-0950 <input type="checkbox"/> (919) 493-6351 <input type="checkbox"/> (919) 968-1889	Cell Business Home	
Hollar, Kurt C Employee Advisors Assistant User Advisory Client	Kurt C. Hollar 200 W. Woodcroft Pkwy., #49A Durham, NC 27713	<input checked="" type="checkbox"/> (919) 403-8132 <input type="checkbox"/> (919) 490-6717 137 <input type="checkbox"/> (919) 260-1037 <input type="checkbox"/> 280-4192	Home Business Cell Trusted Contact	Kurt Preble
Hopwood, William R Employee Advisory Client	William R. Hopwood 10125 Ethridge Court Raleigh, NC 27615	<input checked="" type="checkbox"/> (919) 490-6717 150 <input type="checkbox"/> (919) 824-3851 <input type="checkbox"/> (919) 400-6003.	Business Cell Home	
Huggins, Allen N Employee Advisory Client	Neal Huggins 412 Market Street Wilmington, NC 28401	<input checked="" type="checkbox"/> (910) 262-6203 <input type="checkbox"/> (800) 247-6717 139 <input type="checkbox"/> (910) 762-5428	Cell Business Home	
Hynes, CFP, Peter J Employee Advisory Client Trusted Contact Person	Peter J. Hynes, CFP 2608 Kinlawton Place Raleigh, NC 27614	<input checked="" type="checkbox"/> (919) 452-2851 <input type="checkbox"/> (919) 490-6717 128 <input type="checkbox"/> (919) 452-5534	Cell Business Other	Ann Marie Hynes
J				
Jerome, Benjamin A Employee	Benjamin Andrew Jerome 4105 Palmer Park Circle W, #306 New Albany, OH 43054	<input checked="" type="checkbox"/> (614) 314-4250	Home	Benjamin Andrew Jerome
Johnson, James A Employee	James Adam Johnson 854 Zeek Ridge Court Clermont, FL 34715	<input checked="" type="checkbox"/> (407) 7398937	Home	James Adam Johnson
K				
Kavanagh, Glen G Employee	Glen G Kavanagh Advisor 2431 N Gotland Way Lehi, UT 84043	<input checked="" type="checkbox"/> (615) 281-2730	Home	Glen G Kavanagh
Klas, Peter G Employee Advisory Client	Peter G Klas 2209 Shipton Court Raleigh, NC 27614	<input checked="" type="checkbox"/> (919) 488-0387 <input type="checkbox"/> (919) 490-6717 123 <input type="checkbox"/> (919) 349-6723 <input type="checkbox"/> (919) 354-3073	Home Business Cell Other	
Komsky, Gregory Employee	Gregory Komsky 11358 Wild Oak Drive Oakdale, CA 95361	<input checked="" type="checkbox"/> (916) 719-6644	Home	Gregory Komsky
Krause, Daniel L Employee	Daniel L Krause 8400 Valk Road Oakdale, CA 95361	<input checked="" type="checkbox"/> (209) 765-0592	Home	Daniel L Krause
Kurtzer, Brian Employee Advisory Client	Brian Kurtzer	<input checked="" type="checkbox"/> (919) 870-0924 <input type="checkbox"/> (919) 490-6717 124 <input type="checkbox"/> (919) 637-9356	Home Business Cell	

Phone Book Report

Name	Primary Address	Pr. Number	Phones Type	Contact
K				
		<input type="checkbox"/> (406) 253-7729	Other	
L				
Lewis, Andrew M Employee	Andrew M Lewis Advisor 425 Merrimac Way F201 Costa Mesa, CA 92626	<input checked="" type="checkbox"/> (949) 701-7365	Home	Andrew M Lewis
Lewis, Steven J Employee	Steven J Lewis 2861 Dallas Valley Lane Apex, NC 27502	<input checked="" type="checkbox"/> (919) 354-3069 <input type="checkbox"/> (919) 244-1367	Business Cell	
Ligett, Brian E Employee	Brian E Ligett Advisor 2829 Penfold Lane Wake Forest, NC 27587	<input checked="" type="checkbox"/> (919) 830-8889	Home	Brian E Ligett
Lindros, Amy S Employee	Amy S Lindros 3304 Pinefield Court Efland, NC 27243	<input checked="" type="checkbox"/> (503) 260-0509 <input type="checkbox"/> (919) 490-6717 107	Cell Business	
Lovick, Luciu W Employee Advisory Client	Luciu W. Lovick 3917 Block Drive, Apt. 2297 Irving, TX 75038-8073	<input checked="" type="checkbox"/> (916) 429-5992	Home	
M				
Mach, Vickie J Employee	Vickie J Mach 1582 Terracina Circle Manteca, CA 95336	<input checked="" type="checkbox"/> (209) 481-1070	Home	Vickie J Mack
McGill, Sean J Employee Advisors Assistant User Advisory Client	Sean J. McGill 2305 Windy Woods Drive Raleigh, NC 27607	<input checked="" type="checkbox"/> (919) 490-6717 105 <input type="checkbox"/> (919) 451-1253	Business Cell	
McKinley, Brock M Employee	Brock M McKinley 521 Branding Iron Street Oakdale, CA 95361	<input checked="" type="checkbox"/> (209) 552-5562	Home	Brock M McKinley
McLean, Rob Employee	Rob McLean 9 Menonshire Drive Honeoye Falls, NY 14472-9719			
Mejia, Karina Employee	Karina Mejia 1607 Phillips Dr Sanford, NC 27330	<input checked="" type="checkbox"/> (631) 336-4949	Home	Karina Mejia
Menna, Jacqueline Employee	Jacqueline Menna Advisor 3075 Veterans Memorial Hwy, Suite 130 Ronkonkoma, NY 11779	<input checked="" type="checkbox"/> (631) 252-4800	Cell	
Menna, Rachel Employee	Rachel Menna Advisor 250 Shore Road Mount Sinai, NY 11766	<input checked="" type="checkbox"/> (631) 252-4804	Cell / Mobile	

Phone Book Report

Name	Primary Address	Pr. Number	Phones Type	Contact
M				
Menna, Raymond Employee	Raymond Menna 2410 North Ocean Ave., Suite 500 Mount Sinai, NY 11766	<input checked="" type="checkbox"/> (516) 658-5321	Cell / Mobile	
Miller, Jonathan D Employee	Jonathan D Miller Advisor 707 Braintree Lane Bartlett, IL 60103	<input checked="" type="checkbox"/> (630) 816-7755	Home	Jonathan D Miller
Moes, Nickolas L Employee	Nickolas Le Moes 464 Forest Trail Argyle, TX 76226	<input checked="" type="checkbox"/> (682) 557-9603	Home	Nickolas Le Moes
Munsey, Jeffrey A Employee Advisors Assistant User Advisory Client	Jeff Munsey 1700 High Holly Lane Raleigh, NC 27614	<input checked="" type="checkbox"/> (919) 413-1967 <input type="checkbox"/> (919) 848-8025 <input type="checkbox"/> (919) 490-6717 140	Cell Home Business	
N				
Neville, Erik J Employee	Erik James Neville 6246 W Hanover Way Higland, UT 84003-5523	<input checked="" type="checkbox"/> (209) 321-1134	Home	Erik James Neville
Noteboom, Ginger Employee	Ginger Noteboom 4106 E Jasper Drive Gilbert, AZ 85296-8461	<input checked="" type="checkbox"/> (480) 216-0512	Home	Ginger Noteboom
O				
Ong, Erik Employee	Erik Ong Advisor 1718 San Victorio San Diego, CA 92154	<input checked="" type="checkbox"/> (619) 992-3712	Home	Erik Ong
Osmond, Frederick Employee	Frederick Osmond 25387 Pineview Drive Colfax, CA 95713	<input checked="" type="checkbox"/> (916) 764-0926	Business	
Otto, Albert J Employee Advisory Client	Albert J Otto 1135 Weighhouse Place Kennesaw, GA 30152	<input checked="" type="checkbox"/> (770) 519-8242	Home	Albert J Otto
P				
Portincaso, Michael A Employee	Michael A Portincaso Advisor 1099 Boneset Drive Crystal Lake, IL 60014	<input checked="" type="checkbox"/> (815) 353-1502	Home	Michael A Portincaso
Potter, Jeffrey C Employee Advisory Client	Jeffrey C Potter 165 East Midlothian Boulevard Youngstown, OH 44507	<input checked="" type="checkbox"/> (412) 563-1188 <input type="checkbox"/> (412) 337-6874	Business Cell	
Preble, Kurt D Employee Advisory Client	Kurt D Preble 3520 Darwin Road Durham, NC 27707	<input checked="" type="checkbox"/> (919) 490-6717 116 <input type="checkbox"/> 280-4192 <input type="checkbox"/> (919) 493-1957	Business Cell Home	
R				

Phone Book Report

Name	Primary Address	Pr. Number	Phones Type	Contact
R				
Reid, Christopher Employee	Christopher Reid 2225 Portmarnock Cr Roseville, CA 95678	<input checked="" type="checkbox"/> (916) 7180601	Home	Christopher Reid
Rudd, John Employee Advisory Client	John Rudd 2030 Sycamore Trail Blacksburg, VA 24060-9260	<input checked="" type="checkbox"/> (540) 961-2894 <input type="checkbox"/> (540) 230-7725	Home Business	John C. Rudd
S				
Shelton, Brian Employee	Brian Shelton 3028 Desoto Way S Saint Petersburg, FL 33712-4035	<input checked="" type="checkbox"/> (863) 670-2829	Home	Brian Shelton
Sicuro, Joselyn M Employee	Joselyn M Sicuro 16 Raleigh Place Pittsburgh, PA 15239	<input checked="" type="checkbox"/> (724) 3312034	Home	Joselyn M Sicuro
Simonson, Amy L Employee External Advisor Advisory Client	Amy L Simonson 1828 Spring Overlook Lane Hillsborough, NC 27278	<input checked="" type="checkbox"/> (919) 451-1563 <input type="checkbox"/> (919) 490-6717 100 <input type="checkbox"/> (919) 493-6253	Cell Business Home	
Solano, Gloria Employee	Gloria Solano 702 Gaston Manor Dr Durham, NC 27703	<input checked="" type="checkbox"/> (800) 247-6717 129 <input type="checkbox"/> (407) 340-0251	Business Cell / Mobile	
Somers, Ronald Employee Advisory Client	Ronald Somers Verity Asset Management Financial Advisor 420 Friar Road Winter Park, FL 32792	<input checked="" type="checkbox"/> (321) 230-9849	Home	Ronald Somers
Spini, Donald Employee				
Starkey, Debra Employee	Debra Starkey Advisor 310 NE Foster St Creston, WA 99117	<input checked="" type="checkbox"/> (509) 641-0484	Home	Debra Starkey
Steck, Todd J Employee	Todd J Steck Advisor 7406 Gold Run drive Oakdale, CA 95361	<input checked="" type="checkbox"/> (209) 531-3664	Home	Todd J Steck
Stroemer, Gretchen R Employee Advisory Client	Gretchen R. Stroemer 716 Caswell Rd. Chapel Hill, NC 27514	<input checked="" type="checkbox"/> (919) 968-1923 <input type="checkbox"/> (919) 644-1313 <input type="checkbox"/> (919) 270-5734	Home Business Cell	
T				
Timofeeff, Michael N Employee Advisory Client	Michael N. Timofeeff 868 Upland Drive Elmira, NY 14905	<input checked="" type="checkbox"/> (607) 215-1412 <input type="checkbox"/> (607) 777-2323 <input type="checkbox"/> (607) 732-6581	Cell Business Home	

Phone Book Report

Name	Primary Address	Pr. Number	Phones Type	Contact
T				
Trace, KC Employee	KC Trace Advisor 2974 Spencer Ave Sanger, CA 93657	<input checked="" type="checkbox"/> (559) 309-9763	Home	KC Trace
Trevillian, Malcolm M Employee Advisory Client	Malcolm M Trevillian 700 Derby Court Durham, NC 27707	<input checked="" type="checkbox"/> (919) 218-3965 <input type="checkbox"/> (919) 489-8181 <input type="checkbox"/> (919) 797-0685	Cell Business Home	
W				
Walker, Conrad T Employee	Conrad T Walker 465 El Capitan Drive Danville, CA 94526	<input checked="" type="checkbox"/> (925) 785-9603	Home	Conrad T Walker
Wegwart, Gordon Employee Advisory Client	Gordon Wegwart Verity Asset Management Managing Senior Partner 280 S. Mangum St., Suite 550 Durham, NC 27701	<input checked="" type="checkbox"/> (919) 490-6717 109 <input type="checkbox"/> (919) 451-2905 <input type="checkbox"/> (919) 419-0575	Business Cell Home	
Wildeman, Galen Employee	Galen Wildeman Advisor 404 Rowland Ave Modesto, CA 95354	<input checked="" type="checkbox"/> (209) 204-0303	Home	Galen Wildeman
Woods, Andrew Employee	Andrew Woods 385 E. Wisconsin Ave Lake Forest, IL 60045	<input checked="" type="checkbox"/> (773) 259-3840	Home	Andrew Woods

Regulatory Authorities:

Securities and Exchange Commission (SEC) Atlanta Regional Office

<https://www.sec.gov/regional-office/atlanta>

950 E PACES FERRY RD NE STE 900

ATLANTA GA 30326-1382

Phone 404-842-7600

North Carolina Department of the Secretary of State: Securities Division

<https://www.sosnc.gov/sec/>

Department of the Secretary of State

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RALEIGH NC 27601-2903

Phone 919-814-5400

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Access Financial Group, Inc.

Phone (405) 491-0235

Aspire

Phone (866) 634-5873

Cambridge Investment Research Advisors, Inc.

Phone (641) 4725100 1549

CCF Advisors

Phone (440) 253-2077

Cetera Financial Group

Phone (310) 257-7524

Claraphi Advisory Network, LLC

Phone (206) 453-6710

Cognis Group, LLC

Phone (781) 608-3698

CUNA Brokerage Services, Inc.

Phone (800) 356-2644

Financial Network Investment Corporation

Phone (310) 257-7462

First American National Investment Advisors

Phone (800) 888-8888

G.A. Repple & Company

Phone (407) 339-9090

Huckin Financial Group Inc.

Phone (713) 526-8411

Institutional Securities Corporation

Phone (214) 520-1115

INVEST Financial Corporation

Phone (813) 880 5311

Lally Wealth Management, LLC

Phone (401) 398-7171

Latitude Advisors LLC

Phone (800) 555-1212

Managed Financial Services Corporation, Inc.

Phone (281) 880-7200

Money Concepts Capital Corporation

Phone (561) 472-2023

Monticello Investment Services, Inc.

Phone (417) 623-9500

Multi-Financial Securities Corporation

Phone (310) 257-7524

National Asset Management

Phone (206) 343-8092

NEXT Financial Group

Phone (877) 876-6398

PlanMember Securities Corp.

Phone (800) 874-6910

PrimeVest Financial Services, Inc.

Phone (310) 257-7524

Mamta Rai

Phone (281) 727-9969

Royal Alliance Associates, Inc.

Phone (800) 821-5100

Securities America Advisors, Inc.

Phone (402) 399-9111 1012

TRAC Advisor Group, Inc.

Phone (405) 290-1463

Sub-Advisors:

Earth Equity Advisors, LLC

Phone (877) 235-3684

Franklin Street Advisors

Phone (919) 489-2600

First Ascent Asset Management

Phone (720) 465-7888

Investment Adviser Firms:

Access Financial

Phone (405) 491-0235

Cambridge Investments

Phone (800) 555-1212

Collegiate Financial

Phone (803) 808-1103

Financial Network Investment Corporation

Phone (310) 257-7462

Focus Financial Group

Phone (866) 453-8551

Gilbert M Lorenz Trust

Phone (704) 987-3774

GWN Securities, Inc.

Phone (561) 472-2700

Inorganic Ventures, Inc.

Phone (540) 585-3030

Institutional Securities Corporation

Phone (561) 472-2700

Interactive Financial Advisors

Phone (214) 520-1115

Latitude Advisors, LLC

Phone (630) 472-1300

Lerner Csernai and Fath Financial Group

Phone (231) 796-8621

Markle Financial

Phone (307) 721-1725

Money Concepts Capital Corporation

Phone (561) 472-2023

Monticello Investment Services, Inc.

Phone (417) 623-9500

NEXT Financial Group

Phone (877) 876-6398

Securian Financial Services, Inc.

Phone (855) 651-3500

Securities America Advisors, Inc.

Phone (402) 399-9111

Trustee for Piedmont Tech Sales

Phone (704) 542-3865

UDI Community Development Corporation

Phone (919) 544-4597

Williams Financial Group Advisors, LP

Phone (972) 661-8700