

**FINANCIAL ABUNDANCE, INC.**

---

**Business Continuity & Contingency Plan**

**SEPTEMBER 2022**

**FINANCIAL ABUNDANCE, INC.**  
**(814) 867-5745**  
**2134 SANDY DRIVE, SUITE 1**  
**STATE COLLEGE, PA 16803**

**[WWW.FAICOACH.COM](http://WWW.FAICOACH.COM)**

## TABLE OF CONTENTS

<b>COVER PAGE</b>	<b>0</b>
<b>TABLE OF CONTENTS</b>	<b>1</b>
<b>PREFACE</b>	<b>2</b>
<b>REGULATORY BACKGROUND</b>	<b>2</b>
<b>PLAN OVERVIEW</b>	<b>3</b>
<b>EMERGENCY CONTACT PERSON</b>	<b>3</b>
<b>OFFICE LOCATIONS</b>	<b>4</b>
<b>CUSTOMERS' ACCESS TO FUNDS AND SECURITIES</b>	<b>5</b>
<b>DATA BACK-UP AND RECOVERY</b>	<b>5</b>
<b>FINANCIAL AND OPERATIONAL ASSESSMENTS</b>	<b>6</b>
<b>MISSION CRITICAL SYSTEMS</b>	<b>6</b>
<b>ALTERNATIVE COMMUNICATIONS BETWEEN FIRM &amp; CUSTOMERS, EMPLOYEES &amp; REGULATORS</b>	<b>8</b>
<b>CRITICAL BUSINESS CONTITUENTS, BANKS, AND COUNTER-PARTIES</b>	<b>8</b>
<b>SUCCESSION PLAN POLICY &amp; CONSIDERATIONS</b>	<b>9</b>
<b>SIGNIFICANT BUSINESS DISRUPTIONS ("SBD")</b>	<b>9</b>
<b>EMPLOYEE AWARENESS OF PLAN</b>	<b>10</b>
<b>NOTIFICATION</b>	<b>10</b>
<b>MANAGER APPROVAL</b>	<b>10</b>
<b>GLOSSARY</b>	<b>11</b>
<b>EXHIBIT A</b>	<b>13</b>

## PREFACE

Despite the efforts of each business, state and local government and federal agency to renovate, validate, and implement their mission-critical information systems, the financial industry remains vulnerable to the disruption of its business processes. Because most companies in the financial industry are highly dependent on information technology to carry out their business, a business disruption induced failure of one or more mission critical system(s) may have a severe impact on a financial services Firm's ability to deliver core business services.

Because of these risks, the U.S. Securities and Exchange Commission ("SEC") and State Regulators have implemented programs to attempt to mitigate the risks associated with business failures in the financial industry which would be caused by an event causing a failure to deliver financial services because of a significant business disruption. The SEC has required that Firms create and maintain a business continuity plan.

Ultimately, the business continuity planning process focuses on reducing the risk of business failures resulting from business disruptions. It safeguards a company's ability to produce a minimum acceptable level of outputs and services in the event of failures of internal or external mission-critical information systems and services. While it does not offer a long-term solution to all situations which creates significant business disruption, it will help Financial Abundance, Inc. to prepare for a potential crisis.

## REGULATORY BACKGROUND

### GENERAL OVERVIEW

The SEC takes the position that an adviser's fiduciary obligation to its clients includes the obligation to its clients' interests from being placed at risk because of the adviser's inability to provide advisory services after a disaster, death of a key personnel or other interruption of business. Recordkeeping Rule 204-2(g)(3) ("the Rule") requires advisers that maintain records in electronic formats to establish and maintain procedures to safeguard the records from destruction or loss.

### PLAN ELEMENTS

The Business Continuity Plan ("the Plan") for Financial Abundance, Inc. (referred to herein as "FAI" and/or "Firm") addresses the elements set forth in the Rule. The Rule requires that a Firm's business continuity plan, at a minimum, address 10 critical elements, those are:

1. Data back-up and recovery (hard copy and electronic);
2. All mission critical systems;
3. Financial and operational assessments;
4. Alternate communications between customers and the member;
5. Alternate communications between the member and its employees;
6. Alternate physical location of employees;
7. Critical business constituents, banks, and counterparty impact;
8. Regulatory reporting;
9. Communications with regulators; and
10. How the member will assure customers' prompt access to their funds and securities in the event that the member determines that it is unable to continue its business.

## PLAN OVERVIEW

### FIRM POLICY

The policy of FAI 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 the Firm’s books and records, and to the extent practicable, allowing our customers to transact business as soon as possible following an SBD. In the event that FAI determines that it is unable to continue its business, the Firm will take steps to assure customers prompt access to investments and the underlying issuers of those investments.

### SIGNIFICANT BUSINESS DISRUPTIONS (‘SBD’)

The Plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the ability of FAI to communicate and do business, such as a fire in its building. External SBDs prevent the operation of the securities markets or several Firms, such as a terrorist attack, a pandemic, a city flood, or a wide-scale, regional disruption. The response of FAI to an external SBD relies more heavily on other organizations and systems.

In the event of a flu pandemic or other form of viral outbreak, depending on the circumstances involved, this Firm could disperse main office personnel to other locations in the State College or surrounding areas, provide employees with electronic access to work from their homes, and/or assess ways to make the main office facilities more biohazard resistant.

### APPROVAL AND EXECUTION AUTHORITY

Ashton Immel (“Chief Compliance Officer,” or “CCO”) is the designated officer responsible for approving the Plan on behalf of the Firm, and for conducting the required periodic review. The CCO or designee has the authority to execute this Plan.

### PLAN LOCATION AND ACCESS

FAI will maintain copies of the Plan and the periodic reviews, and the changes that have been made to it. The Firm will make such records available for inspection by the SEC and/or various state regulators. An electronic copy of the Plan is located on FAI’s cloud service provider, in the folder named “Guides and Manuals. In the compliance folder under SEC.”

### UPDATES AND ANNUAL REVIEW

FAI will update the Plan whenever there is a material change in the operations, structure, business, or location of the Firm. In addition, FAI will review this Plan periodically to modify it for any changes in the operations, structure, business, or location of the Firm.

## EMERGENCY CONTACT PERSON

Executive Management is aware of the potentially devastating financial, organizational, and political consequences of the failure of one or more mission-critical information systems. The two emergency contact persons for FAI are:

**Ashton Immel**

**CHIEF COMPLIANCE OFFICER**

**Office Phone: (814) 867-5745**

**Cell Number: (814) 571-5462**

**E-Mail Address: ashton@financialabundanceinc.com**

Paul Nichols

**President**

**Office Phone: (814) 867-5745**

**Cell Number: (814) 571-6368**

**E-Mail Address: [pauln@financialabundanceinc.com](mailto:pauln@financialabundanceinc.com)**

## **BUSINESS DESCRIPTION**

Financial Abundance, Inc. is an investment advisory firm that conducts business in equity, fixed income, and securities. Advisor does not custody or discretion of customer funds or securities. All client assets are sent to our custodian(s) which execute(s) our orders, compares them, allocates them, clears, and settles them. Our custodian firm(s) also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only institutional customers. We do not engage in any private placements.

Our custodial firm(s) is Pershing, LLC, One Pershing Plaza, New Jersey City, NJ 07302, (866)-686-3023, [www.pershingadvisorsolutions.com](http://www.pershingadvisorsolutions.com) and our contact person(s) at this custodian is Steve Kaplan, [steve.kaplan@pershing.com](mailto:steve.kaplan@pershing.com). Then there are some assets left still at our previous custodian Charles Schwab, 1958 Summit Park Dr., Suite 200, Orlando, FL 32810, 800-515-2157, [www.schwab.com](http://www.schwab.com) and our contact person(s) at that custodian is Jeb Snyder, 513-204-8000; [Jeb.Snyder@matsonmoney.com](mailto:Jeb.Snyder@matsonmoney.com). Lastly there is TIAA-CREF Life Insurance Co., 8500 Andrew Carnegie Blvd., Charlotte, NC 28262, 877-825-0411, [www.tiaa.org](http://www.tiaa.org), and our contact person at that custodian is Dennis Rupp, 704-988-6630, [drupp@TIAA.org](mailto:drupp@TIAA.org). Our custodian(s) firm of Pershing and TIAA-CREFF has/have also given us the following alternative contact in the event it cannot be reached:

Kenny Gatliff, 2701 W. Queen Creek Rd. #3., Chandler, AZ 85248, [Kenny.Gatliff@CreativePlanning.com](mailto:Kenny.Gatliff@CreativePlanning.com), 480.935.5734, [www.creativeplanning.com](http://www.creativeplanning.com)

## **OUR SERVICES INCLUDE**

### **INVESTMENT ADVISORY**

Distinguishing itself from traditional investment advisory firms by providing a holistic, unique educational process designed to enable clients to make key decisions in the area of investment needs, as well as income planning, specialized tax planning, estate planning, risk management, retirement planning, and business development needs.

### **FINANCIAL PLANNING**

We conduct an analysis of your current situation and identify and implement appropriate financial planning and investment management techniques to help you to meet your specific financial objectives. Such services include various reports on specific goals and objectives or general investment and/or planning recommendations, answers to outside assets and periodic updates.

## **OFFICE LOCATIONS**

FAI's office is located at 2134 Sandy Dr., Suite1, State College, PA 16803. The main telephone number is 814-867-5745. Our employees may travel to that office by means of car. We engage in order taking and entry at this location. We also have a satellite office at 23 N. Derr Dr., Suite 20, Lewisburg, PA 17837. Its main telephone number is 814-867-5745. This office functions to meet clients, we do all administrative tasks from the State College office.

## **ALTERNATIVE LOCATION FOR EMPLOYEES**

In the event of an SBD, Advisor will move staff from affected offices to the closest of our unaffected office locations. If none of our other office locations is available to receive those staff, we will move them to 23 N. Derr Dr., Suite 20, Lewisburg, PA 17837. Its main telephone number is 814-867-5745.

## **EMPLOYEES WORKING REMOTELY**

We will allow employees to work remotely (i.e., teleworking) provided the following procedures are in place and followed:

- each supervisor will review his or her responsibilities and adjust them as necessary considering the different type of interaction with the supervised person working remotely and the supervisor may need to take on expanded roles;
- employees will be permitted to only use a work-issued laptop or desktop that has been appropriately secured;
- security for communications, web-based applications and electronic connectivity systems will be enhanced to address new potential threats of employees working outside the network at the office;
- employees will be trained or will have been trained on working remotely;
- where necessary, new, or modified procedures for placing client trades will be implemented; and
- where necessary, onboarding new employee procedures will be adjusted due to the greater challenges of performing background checks and other due diligence.

In addition, the Firm, where necessary, will modify its “normal operating” supervisory and compliance policies and procedures to address the unique risks and conflicts of interest presented by remote operations. In doing so, the Firm will consider:

- whether additional resources and/or measures for securing servers and systems are needed;
- how to maintain and secure the integrity of vacated facilities is maintained;
- how to collect regulatory-required records generated by employees working remotely;
- whether there is a need for relocation infrastructure and support for personnel operating from remote sites is provided; and
- how to protect data located remotely.

## **CUSTOMERS’ ACCESS TO FUNDS AND SECURITIES**

As stated above, Advisor does not maintain custody of customers’ funds or securities, which are maintained at our custodial firm(s), Pershing, LLC, Charles Schwab, and TIAA-CREF.

In the event of an internal or external SBD, if telephone service is available, our Investment Adviser Representatives will continue to take customer orders or instructions and, to the extent practicable, assist such customers in contacting custodians.

In the event that customers of FAI are unable to access the Firm, either at its primary phone number or the Firm emergency number, customers will be able to contact the custodian directly for instructions on how they may obtain prompt access to funds and securities, subject, however, to any limitations set forth previously by the custodian.

## **DATA BACK-UP AND RECOVERY**

---

## **ELECTRONIC AND HARD COPY BOOKS AND RECORDS**

FAI maintains its primary hard copy books and records and its electronic records at 2134 Sandy Dr., Suite 1 State College, PA 16803. Ashton Immel is responsible for the maintenance of these books and records. The firm utilizes encrypted web-based services of Redtail Technology and Dropbox which are redundantly backed up through the providers.

---

## **BACK UP PROCEDURES**

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.

---

## **FINANCIAL AND OPERATIONAL ASSESSMENTS**

---

### **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 counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our Web site, [www.FAIcoach.com](http://www.FAIcoach.com), 814-867-5745 voice mail, [pauln/deb/ashton/joel@financialabundanceinc.com](mailto:pauln/deb/ashton/joel@financialabundanceinc.com). In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

---

### **FINANCIAL CREDIT RISK**

In the event of a SBD, FAI will determine if the business interruption causes the company to interrupt its operations to the point that the alternative measure discussed in the sections above and below cannot be implemented, the Company's customers shall be referred to the custodian.

---

## **MISSION CRITICAL SYSTEMS**

---

### **DEFINITION**

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

---

### **IDENTIFY BUSINESS SYSTEMS**

FAI will identify the mission critical systems utilized by the Firm in providing services to its clients.

---

### **ASSESSMENT**

FAI has primary responsibility for establishing and maintaining its business relationships with customers, and the sole responsibility for maintaining our mission critical functions of order taking and entry. Its mission critical systems include a cloud service, laptop/desktop computers, phone systems, and Redtail email hosting/CRM.

---

**ORDER TAKING**

Currently, FAI may correspond with customers in person, via telephone, live video conferencing, or electronic mail. During an SBD, either internal or external, the Firm will continue to correspond in any of these methods that are reasonably available to it and reliable, and in addition, as communications permit, the Firm will inform its customers when communications become reasonably available to tell them what alternatives are available.

In the event of an internal SBD, we will enter and send records to our custodial firm by the fastest alternative means available. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver the order to the custodial firm 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 our custodial firm for order entry.

Our custodial firm contract provides that our custodian will maintain a business continuity plan and the capacity to execute that plan. Our custodian 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 custodial firm executes its plan, it represents that it will notify us of such execution and provides us equal access to services as its other customers. If we reasonably determine that our custodial 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 custodial firm represents that it will assist us in seeking services from an alternative source.

Our custodian(s) represent(s) that it backs up our records at a remote site. Our custodial 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 custodial firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

---

**OTHER SERVICES CURRENTLY PROVIDED TO CUSTOMERS**

Investment Adviser Representatives may provide services to customers other than those directly related to investment management and financial planning via other affiliated entities.

Currently, Investment Adviser Representatives may correspond with customers in person, via telephone, live video conferencing, or electronic mail. During an SBD, either internal or external, the Firm will continue to correspond in any of these methods that are reasonably available and reliable, and in addition, as communications permits. The Firm will inform its customers when communications become available.

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 custodial firm has appropriate SBD recovery time and resumption objectives.



## ALTERNATIVE COMMUNICATIONS BETWEEN FIRM & CUSTOMERS, EMPLOYEES & REGULATORS

FAI, Inc is a fee-only holistic financial planning firm that specializes in financial planning and investment advisory services to individuals and families.

### CUSTOMERS

FAI currently communicates with our customers using the telephone, e-mail, live video conferencing, US Mail, delivery services and in person visits at our offices or at the customer's location. In the event of a SBD, the Firm will assess which means of communication are still reasonably available to it, and use the means closest in speed and form, either written or oral, to the means that have been used in the past to communicate with the other party. For example, if FAI has communicated with a party by e-mail but the Internet is unavailable, the Firm will call them on the telephone and follow up where a record is needed with paper copy in the United States Mail.

### EMPLOYEES

FAI currently communicates with its employees using the telephone, e-mail and in person. In the event of a SBD, the Firm will assess which means of communication are still reasonably available, and use the means closest in speed and form, either written or oral, to the means that have been used in the past to communicate with the other party. R. Paul Nichols or designee shall contact and communicate with appropriate executives of the Firm as to who shall be responsible to contact and/or communicate to the employees by telephone, e-mail, messenger or in person.

### REGULATORS & REGULATORY REPORTING

With respect to regulatory reporting, FAI currently files report with the respective Regulators using paper copies in the United States Mail and delivery services, electronically using facsimile, e-mail, and the Internet, and through service providers who provide access through the same methods. In the event of a SBD, the Firm will check with Regulators to determine which means of filing are still available to it and use the means closest in speed and form (written or oral) to previous filing methods utilized by FAI. If FAI cannot contact its Regulators, it will continue to file required reports using the communication means available to the Firm. Contact information regarding the Regulators with whom the Firm files reports on a regular basis is attached hereto on **Exhibit A**.

## CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES

### BUSINESS CONSTITUENTS

FAI has contacted its critical business constituents (businesses with which the Firm has ongoing commercial relationship in support of its operating activities, such as vendors providing us critical services) and determined the extent to which the Firm can continue its business relationship with them considering the internal or external SBD. The Firm will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when needed because of an SBD to them or the Firm. The Firm maintains a list of Critical Business Constituents including the supplier's name, service and/or product, address and phone number and any alternative supplier's name, service, address, and phone number.

### COUNTER-PARTIES

FAI has contacted its critical counterparties, such as custodians, companies or entities offering investment products, or institutional customers, to determine if it will be able to carry out its transactions with them considering the internal or external SBD. Where the transactions cannot be completed, the Firm will contact

those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

## SUCCESSION PLAN POLICY & CONSIDERATIONS

FAI ensures our business will remain successful and be able to adapt to events that may arise (including, among other things, retirement). The following is an overview of our succession plan considerations:

### SUCCESSION PLAN CONSIDERATIONS

- **Temporary Absences-** where a key individual is gone for a period lasting from one to four weeks. *Temporary Absence would NOT trigger a succession plan.*
- **Short-Term Absences-** an absence of 30 days or more, after which it is expected that an adviser will return to the Firm once the events precipitating the absence are resolved. It can also involve an absence that arises unexpectedly (instead of a planned leave, such as a sabbatical) or that will last for a specific duration – e.g., between 30 and 90 days or less. Generally, such a *Short-Term Absence would trigger a succession plan.*
- **Long Term Absences-** absences lasting more than 90 days. *If an adviser will return, a succession plan can be drafted to address the needs of a business for this extended period.* Permanent absences, most commonly due to either retirement or death of an adviser, would be included in this category.

### SUCCESSION PLAN POLICY

In the event the CCO of FAI is no longer able to serve in this position, the advisory accounts will be overseen by R. Paul Nichols or referred to the custodian of the account.

## SIGNIFICANT BUSINESS DISRUPTIONS (“SBD”)

### INTERNAL SBD – FACILITIES EMERGENCY EVACUATION PROCEDURES

#### FIRE EMERGENCY OR BOMB THREAT EVACUATION PROCEDURES

If an evacuation of any facility is necessary, follow the directions given by the designated Fire Marshall for the facility. If evacuation of the space is necessary because of fire, on hearing the fire alarm bells sounding continuously, employees should:

- Evacuate the building by the nearest available fire exit. As always, if you see or smell smoke, you should proceed to one of the other fire exits. Remember, if you have visitors or contractors with you, instruct them to follow you.
- The arrangements for people with impaired mobility or pregnant women are as follows: The FAI Fire Marshall will accompany them to the front exit stairwell. They will meet at the Assembly Point 1 which is in the middle hallway, near the elevator.
- CLOSE ALL DOORS WITHOUT CAUSING DELAYS, taking risks, or obstructing people behind you.
- DO NOT stop to collect personal belongings
- DO NOT use the elevators
- Leave the building by calmly walking to Assembly Point 2.
- DO NOT re-enter the building until instructed to do so by Ashton Immel. At Assembly Point 2, report your presence to the Fire Marshall for FAI.

## EMERGENCY DURING BUSINESS HOURS

All personnel of FAI should follow the standard emergency evacuation procedures above.

## EMERGENCY OUTSIDE OF BUSINESS HOURS

In an emergency involving any employees' personal safety, it is the responsibility of every employee to check in and report their whereabouts. You should leave a voice mail on your manager's office phone and/or cell phone. If you cannot reach your manager, please leave a voicemail on the CCO's phone:

**Ashton Immel**

**CHIEF COMPLIANCE OFFICER**

**Office Phone: (814) 867-5745**

**Cell Number: (814) 571-5462**

**E-Mail Address: ashton@financialabundanceinc.com**

When leaving your initial message, please include the following information:

- Your Name
- Your contact numbers
- Where you are physically
- Whether you have access to your voicemail and e-mail

## EMPLOYEE AWARENESS OF PLAN

FAI will take steps to both educate and increase the awareness of its employee and associated persons with respect to the Firms' Plan and the current actions being taken to address such issues by the financial services industry and FAI. To this end, FAI shall deliver the Plan to all associated persons of FAI who shall then acknowledge their receipt and review of the Plan.

## NOTIFICATION

In addition to any action taken by the Firm with respect to disruption of its business processes which relate to the ability of FAI to deliver financial services to its customers, FAI will promptly notify the appropriate regulators of any such problems.

## MANAGER APPROVAL

In my capacity as the CCO for FAI, I have approved this Business Continuity Plan for FAI, effective as of the date set forth herein, as being reasonably designed to enable the Firm to meet its obligations to customers in the event of an SBD.

### MANAGER SIGNATURES

CCO Signature:	Date:
CCO Print Name:	

---

**APPLICATION**

A computer program or set of programs designed to help people perform certain types of work.

---

**ASSESSMENT**

The process of identifying core business areas and processes, completing an inventory, and analyzing systems supporting the core business areas, prioritizing their conversion or replacement, identifying risks and the necessary resources.

---

**BUSINESS AREA**

A grouping of business functions and processes that result in the production of specific outputs or services.

---

**BUSINESS FUNCTION**

A group of logically related tasks, which when they are performed, accomplish an objective.

---

**BUSINESS CONTINUITY PLAN**

A contingency plan describes the steps a company would take, including the activation of manual or contract processes, to ensure the continuity of its core business processes in the event which causes a business interruption induced system or process failure.

---

**DEFECT**

A problem or “bug” that, if not removed, could cause a program to either produce erroneous results or otherwise fail.

---

**FIRM**

Financial Abundance, Inc.

---

**INFRASTRUCTURE**

The computer and communication hardware, software, databases, people, and policies supporting the company’s businesses and operations.

---

**INTERFACE**

A connection between two business systems or processes. The hardware or software needed to enable one device to communicate with another.

---

**MISSION-CRITICAL SYSTEM**

The loss of these critical functions would cause an immediate stoppage or significant impairment to core business areas.

---

**OUTSOURCING**

Paying another company or individual, to provide services that an organization might otherwise have performed itself, (i.e., software development, payroll)

---

**PLATFORM**

The foundation technology of a computer system. Typically, a specific combination of hardware and operating software.

---

**REGULATORS**

Refers collectively to the SEC and various other regulatory entities having jurisdiction over the business activities of FAI, Inc. .

---

**SBD**

Significant Business Disruption

---

**SEC**

U.S. Securities and Exchange Commission

---

**QUALITY ASSURANCE**

The critical review process to guarantee that all procedures, tasks, analysis, and reporting were correctly performed.

---

**UTILITIES**

To a business this could mean several things: computer programs designed to perform maintenance work on the system or on system components, i.e., a storage back-up system, a disk or file recovery program, or a resource editor; or the general phrase used to refer to telecommunication, electrical, gas, water, and waste management services.

**REGULATOR CONTACT INFORMATION**

**State of Pennsylvania**

Division of Securities  
1 South Broad Street, #552-A  
Philadelphia, PA 19107

**U.S. Securities and Exchange Commission - SEC**

1617 JFK Blvd.  
Suite 520  
Philadelphia, PA 19103  
215-597-3100

**IARD Website**

<http://www.iard.com/>

**MISSION CRITICAL CONTACT INFORMATION**

**Custodian**

Pershing, LLC  
One Pershing Plaza  
New Jersey City, NJ 07302,  
Phone: (866)-686-3023  
Contact: Steve Kaplan, (866)-686-3023  
Email: [steve.kaplan@pershing.com](mailto:steve.kaplan@pershing.com)  
[www.pershingadvisorsolutions.com](http://www.pershingadvisorsolutions.com)

**Custodian**

Charles Schwab  
1958 Summit Park Dr., Suite 200  
Orlando, FL 32810,  
Phone: (800)515-2157  
Contact: Jeb Snyder, 513-204-8000  
Email: [Jeb.Snyder@matsonmoney.com](mailto:Jeb.Snyder@matsonmoney.com)  
[www.schwab.com](http://www.schwab.com)

**Custodian**

TIAA-CREF Life Insurance Co.  
8500 Andrew Carnegie Blvd.  
Charlotte, NC 28262  
Phone: 877-825-0411  
Contact: Dennis Rupp  
Phone: [\(704\) 988-6630](tel:7049886630)  
Email: [drupp@TIAA.org](mailto:drupp@TIAA.org)  
Website: [www.tiaa.org](http://www.tiaa.org)

**Sub-Advisor**

Kenny Gatliff

2701 W. Queen Creek Rd. #3

Chandler, AZ 85248

Phone: (480) 935-5734

Email: [Kenny.Gatliff@CreativePlanning.com](mailto:Kenny.Gatliff@CreativePlanning.com)

Website: [www.matsonmoney.com](http://www.matsonmoney.com)