# JANSSEN PARTNERS, INC. BUSINESS CONTINUITY PLAN

## 1. EMERGENCY CONTACT PERSONS

The two emergency contact persons for Janssen Partners, Inc. are as follows:

Peter Janssen, President

Cell phone number: 516-456-7059 Home phone number 641-209-9938 Email: janssenpartners@gmail.com

Robert Burnat

Phone number: 212-362-4488 Cell phone number: 212-935-7640 Email: <a href="mailto:rmburnat@gmail.com">rmburnat@gmail.com</a>

These names are reviewed by our Executive Representative when necessary and in the event of a material change the will be updated.

Rule: FINRA Rule 3520

#### 2. FIRM POLICY

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safe-guarding 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 heavily on other organizations and systems, especially on the capabilities of our clearing firm Wedbush Securities.

# B. Approval and Execution Authority

Peter Janssen, President, a registered principal, is responsible for approving the plan and for conducting the required annual review. Peter Janssen, President has the authority to execute this BCP.

## C. Plan Location and Access

Our firm will maintain copies of its BCP and the annual reviews, and the changes that have been made to it for inspection. A link to an electronic copy of our plan is located on the bottom of the "About" page on www.janssenpartners.com

## 3. BUSINESS DESCRIPTION

Our firm is an introducing firm and does not perform any type of clearing functions for itself or others. We are primarily focused in doing private placements. Futhermore, 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. We service both retail and institutional customers.

Our clearing firm is Wedbush Securities, 1000 Wilshire Blvd., Los Angeles, California 90017, <a href="https://www.wedbush.com">www.wedbush.com</a>, telephone number 213-688-4575. Our clearing firm has also given us the following alternative contact in the event it cannot be reached:

Wedbush Securities, 601 Union St. Ste. 4700, Seattle, WA 98101, telephone number 206-623-3040.

### 4. OFFICE LOCATIONS

Our one and only office is located at 2094 185<sup>th</sup> Street Ste. 17 Fairfield, Iowa 52556. The telephone number is 641-209-5940. Our employees may travel to this office by means of foot or automobile. We engage in order taking and entry at this location.

# 5. ALTERNATIVE PHYSICAL LOCATIONS OF EMPLOYEES

In the event of an SBD, we will move our staff from the affected office to the Janssen residence at 1010 North B. Street, Fairfield, Iowa 52556. The telephone number there is 641-209-9938. Rule: FINRA Rule 3510(C)(6)

#### 6. CUSTOMERS' ACCESS TO FUNDS AND SECURITIES

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, Wedbush Securities. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting Eve King at Wedbush. The firm will make this information available to customers through its disclosure policy.

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 3510(a); Securities Exchange Act Rule 15c3-1; 15 USC 78eee (2003)

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

Our firm maintains its primary hard copy books and records and its electronic records at 2094 185<sup>th</sup> Street Ste. 17, Fairfield, Iowa 52556. Peter Janssen is responsible for the maintenance of these books and records. The firm backs up its records daily by external hard drive and all email journaling is maintained through <a href="https://www.globalrelay.com">www.globalrelay.com</a>

In the event of an internal or external SBD that causes loss of our paper records, we will physically recover them from our back up site. If our primamry site is inoperable we will continue operations from our back up site, which is 1010 North B Street Fairfield, Iowa 52556,

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 3510(c)(1)

# 8. 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. We will contact our customers and advise them how to contact us. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include contacting our customers and advising them how to contact us (website, telephone voice mail, email, etc.). In addition, we will retrieve our key activity records as described in the section above, Data Back Up Recovery.

Rules: FINRA Rules 3510(c)(3)&(f)(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 there is any significant change. 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, including notifying the SEC and FINRA.

Rules: FINRA Rules 3510 c3, c8 & f2

# 9. MISSION CRITICAL SYSTEMS

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

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, entry and execution. Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. In the event our clearing firm executes its plan, it

represents that it will notify us of each execution and provide equal access to services as its other customers.

Our clearing firm represents that it backs up our records at a remote 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 4 hours; and resumption time within the same business day.

# A. Our Firm's Mission Critical Systems

# 1. Order Taking

Currently, Our firm receives orders from customers via telephone. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by phone. If necessary, we will advise our customers to place orders directly with our clearing frim at 213-688-4575.

#### 2. Order Entry

Currently our firm enters orders by calling them into Wedbush or entering them electronically. We place orders through Broker Insight. We have contacted Broker Insight and were told that, under its BCP we can expect service within 6-12 hours. In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include faxing or e-mailing. In the event of an external SBDm we will maintain the order in electronic format and deliver the order to the clearing 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 clearing firm for order entry.

# 3. Order Execution

We currently enter orders through Wedbush.

## 4. Other Services Currently Provided to Customers

We do not provide other services to customers. Therefore in the event of an internal or external SBD no other services would need to be provided.

# B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies by contract on our clearing firm to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

Rules: FINRA Rules 3510c &fl

10. Alternative Communications between the Firm and Customers, Employees, and Regulators

#### A. Customers

Any business we conduct with customers is done via the telephone. In the event of an SBD, we would contact the customers with an alternate telephone number or instruct them to contact Wedbush.

## B. Employees

We no communicate with our employees via telephone, e-mail, or in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office numbers, as well as e-mail addresses. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is Peter Janssen.

	Caller	<b>Telephone Number</b>	E-Mail Address
1	Peter Janssen	516-456-7059	pj@janssenpartners.com
2	Robert Burnat	212-362-4488	rmburnat@gmail.com

Rule: FINRA Rule 3510c5

## C. Regulators

We are currently members of the following SRO's: FINRA, SEC. We communicate with our regulators using the telephone and or the US Mail and in person. In the event of an SBDm 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 3510 c9

# 11. Critical Business Constituents, Banks, and Countewr-Parties

## A. Business Constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us

critical services), and determined the extent to which we can continue our business relationship with the in light of the internal or external SBD.

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

Rules: FINRA Rule 3510 c7

#### B. Banks

The nature of our business does not require any financing, therefore, an internal or external SBD would not require any additional needs. The bank maintaining our operating account is Chase Bank of Roslyn NY, 1345 Old Northern Blvd, Roslyn, NY 11576, 516-621-0157.

Rules: FINRA Rule 3510 c7

## C. Counter Parties

We have contacted our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

Rule: FINRA Rules 3510a &c7

## 12. Regulatory Reporting

Our firm is subject to regulation by the NASD, SEC, and Iowa and other states. We now file reports with our regulators using paper copies in the US 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. FINRA Helene Young, 516-949-4261.

Rule: FINRA Rule 3510 c8

## 13. Disclosure of Business Continuity Plan

We disclose in writing a summary of our BCP to customers at account opening. We also mail it to customers upon request and will maintain a copy on our website. Our summary discloses how to reach us and/or Wedbush if there should be an SBD. Below is the summary.

Rule: FINRA Rule 3510e

## 14. 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 September 1<sup>st</sup>, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

Rule: FINRA Rule 3510b

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 3510d

A copy of this BCP is being kept as an email to Peter, as well as hard copy sent to his home.

Signed

Title President

Date 9/27/12