

**JANSSEN PARTNERS, INC.**  
Business Continuity Plan (BCP)

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**Emergency Contact Persons**

Our firm's two emergency contact persons are: Peter Janssen, President, Tel. 641-209-5940, Cell 516-456-7059, Fax 641-843-7036, pj@janssenpartners.com, and Robert Burnat, FINOP, Tel. 212-362-4488, Cell 212-935-7640, rmburnat@gmail.com . The firm and Peter Janssen are located at 1010 North B Street, Fairfield, IA 52556. Robert Burnat is located offsite in NYC, NY.

The firm will provide FINRA with the contact information for the two emergency contact persons: (1) name; (2) title; (3) mailing address; (4) email address; (5) telephone number; and (6) facsimile number through the FINRA Contact System (FCS). Peter Janssen will promptly notify FINRA of any change in this information through FCS (but no later than 30 days following the change) and will review, and if necessary update, this information within 17 business days after the end of each calendar year.

**Firm Policy**

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business.

A. **Significant Business Disruptions (SBDs)**

Our plan anticipates two types of SBDs. 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.

## B. Approval and Execution Authority

Peter Janssen, President and the sole general securities principal, is responsible for approving the plan and for conducting the required annual review. He has the authority to execute this BCP.

## C. Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection.

## **Business Description**

Our firm conducts primarily a private placement business and can also conduct business as a stock & bond broker. Our firm does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. All transactions are pursuant to agreements and offerings or through the clearing firm. Our firm services high net worth and institutional customers.

## **Office Location**

Our firm has one office location at 1010 North B Street, Fairfield, IA 52556. Its main telephone number is 641-209-5940. Our employees may travel to that office by means of car.

## **Alternative Physical Location(s) of Employees**

In the event of an SBD, we will move our staff from affected office(s) to the closest of our unaffected back up location (Peter Janssen's other home) at 3590 s Ocean Blvd. # 503, Palm Beach, FL 33480, due to current operations this will be a suitable backup location in the event it is needed.

## **Customers' Access to Funds and Securities**

Our firm does not maintain custody of customers' funds or securities.

## **Data Back-Up and Recovery (Hard Copy and Electronic)**

Peter Janssen, general securities principal is responsible for the maintenance of these books and records. These records are paper copies. Peter Janssen is responsible for the maintenance of these back-up books and records. Our

firm backs up its paper records by copying and taking them to our back-up site. We back up our records every month.

Our firm maintains its back-up of the firm's books and records in hard copy books, emails are backed up and maintained by Global Relay.

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.

### **Financial and Operational Assessments**

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include telephone voice mail, and email. In addition, we will retrieve our key activity records as described in the section above.

We will request additional financing from the owner of the firm if needed. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the necessary appropriate steps.

### **Mission Critical Systems**

Our firm's "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. More specifically, these systems include only the computer which the firm's principal uses to access the internet for access to clearing firm information. There are no other mission critical system.

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

Our clearing firm represents that it backs up our records (see attached clearing firm BCP). Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption.

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 Firm's Mission Critical Systems**

#### **Order Taking**

If our firm receives orders from customers via telephone. During an SBD, either internal or external, we will continue to take orders through the telephone 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 telephone. If necessary and as applicable, we will advise

our customers to place orders directly with our clearing firm. Private placements are done via subscription documents.

### **Order Entry**

Our firm enters orders by recording them on paper and sending them to our clearing firm. 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 the telephone. In the event of an external SBD, we will maintain the order in electronic or paper 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.

### **Order Execution**

We currently do not execute orders.

### **Other Services Currently Provided to Customers**

We do not provide any other services to our customers.

### **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.

### **Alternate Communications Between the Firm and Customers, Employees, and Regulators**

#### **A. Customers**

We now communicate with our customers using the telephone, fax, U.S. mail, and in person visits at our firm's location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

## B. Employees

We now communicate with our employees using the telephone, e-mail, and 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. Peter Janssen will contact all employees of the firm, however at this time the firm has 2 registered persons.

## C. Regulators

We are currently members of the FINRA. We communicate with our regulators using the telephone, e-mail, fax, U.S. mail, and 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.

## **Critical Business Constituents, Banks, and Counter-Parties**

### D. 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 them 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 a SBD to them or our firm.

### E. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: Chase Bank. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from the owner.

## F. Counter-Parties

We have contacted our critical counterparties, such institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

### **Regulatory Reporting**

Our firm is subject to regulation by FINRA, SEC and states. We now file reports with our regulators electronically with FINRA and paper copies with SEC and other regulators, we will 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.

### **Disclosure of Business Continuity Plan**

Attached is our written BCP disclosure statement we provide customers at account opening and annually when applicable.

### **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, each December, to modify it for any changes in our operations, structure, personnel, business or location.

**Senior Manager Approval**

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

Signed:

President

Updated March 15, 2015

Attachment A to  
**JANSSEN PARTNERS, INC.**  
**Business Continuity Planning**

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

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do Peter Janssen, President, Tel. 641-209-5940, [pj@janssenpartners.com](mailto:pj@janssenpartners.com), Cell 516-456-7059, you should call our secondary contact: Bob Burnat, FINOP, Tel. 212-362-4488, Cell 212-935-7640.

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

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

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 1 day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 1 day.

**For more information** – If you have questions about our business continuity planning, you can contact us at 641-209-5940, or via email at [pj@janssenpartners.com](mailto:pj@janssenpartners.com).