

# BLUECHIP WEALTH ADVISORS 2023 BUSINESS CONTINUITY PLAN

## **Emergency Contact Persons**

BlueChip Wealth Advisors ("BCWA" or "the Firm") two emergency contact persons are:

Marcus Ashworth
Managing Partner/CEO/Owner
W (770) 771-5823
C (404) 314-9270
H (770) 772-4215

Email: marcus@bcwealthadvisors.com

**Alternative Email:** 

Jessica Vickery Chief Compliance Officer W (770) 771-5812 C (678) 622-5578

Email: jessica@bcwealthadvisors.com

Alternate Email:

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

## Firm Policy

The 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 customers to transact business. If we determine we are unable to continue business, we will assure customers prompt access to their funds and securities.

# **Significant Business Disruptions (SBDs)**

BCWA's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the firm's ability to communicate and do business, such as a fire in the 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. The response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of custodian(s).



# **Approval and Execution Authority**

Jessica Vickery, CCO, is responsible for approving the plan and for conducting the required annual review. Jessica Vickery, CCO and Marcus Ashworth, CEO have the authority to execute this BCP.

#### Plan Location and Access

The firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. A physical copy of the BCP will be stored in the operations office. An electronic copy of the plan is located on the firm's cloud server under the "General" folder, in the BCP subfolder.

# **Business Description**

BlueChip Wealth Advisors conducts business in equity, fixed income, mutual funds and alternative securities. The firm is a Registered Investment Advisory Firm in which orders are accepted and entered through various custodians such as Arkadios (a Broker Dealer), TD Ameritrade, SEI Private Trust Company and Charles Schwab. All securities transactions are sent directly to the custodians, whom execute, compare, clear, and settle transactions. Custodians also maintain customers' accounts, grants, customers access to them, and delivers funds and securities. The firm does not hold any customer funds or securities. Investment Advisor Representatives assess clients' risk tolerance, suitability, time frame, and goals to design investment strategies accordingly. The firm maintains discretionary authority on all advisory accounts and continually monitor, rebalance, and or reposition client portfolios, as necessary or desired by client.

#### **Custodians**

TD Ameritrade Institutional 510 Wateridge Vista Drive San Diego, CA 92121-5775 1-800-431-3500 southeast@tdameritrade.com

National Financial Services 260 Franklin Street, Suite L7B Boston, MA 02110 (800) 801-9942 www.nationalfinancial.com

SEI Private Trust Company One Freedom Valley Drive Oaks, PA 19456 (610)676-1000



Charles Schwab Orlando Operations Center PO Box 628290 Orlando, FL 32862

#### **Broker-dealer**

Arkadios Capital 309 East Paces Ferry Road Atlanta, Ga. 30305

# **BlueChip Wealth Advisors Office Locations**

12655 Birmingham Hwy. Suite 201 Milton, Georgia 30004 www.bcwealthadvisors.com

# Alternative Physical Location(s) of Employees

In the event of an SBD, the firm will move key personnel the non-affected office location or to the home of Marcus Ashworth:

810 Colonial Lane Alpharetta, Georgia 30004 (770) 772-4215

A secondary alternate location in which the firm may move key personnel is to the home of Jessica Vickery:

116 Hidden Lake Circle Canton, Georgia 30114

All other staff will utilize the terminal server provided by the various custodians. Phone numbers will be forwarded to respective member's individual mobile phone. The main phone line will be answered by the firm's Office Manager's mobile phone. Incoming and Outgoing calls will be conducted as per usual.

#### Customer Access to Funds and Securities

The firm does not maintain custody of customers' funds or securities, which are maintained at custodians, National Financial LLC, and/or TD Ameritrade Institutional, and/or Schwab, and/or SEI Private Trust Company, or directly at the investment company, who acts as custodian for those accounts. In the event of an internal or external SBD, if telephone service is available, registered persons will take customer orders or instructions and contact



custodian or custodial investment company or insurance carrier on their behalf, and if Web access is available, the firm will post on the firm's website that customers may access their funds and securities by contacting emergency contact numbers. The firm will make information and disclosures known to customers through the firm's website that is handled by an outside entity with co-locations.

# **Data Back-Up and Recovery (Paper and Electronic)**

The firm maintains its primary books and records in electronic format at 12655 Birmingham Hwy Suite 201, Milton, GA 30004. No paper books and records are maintained. Jessica Vickery, Chief Compliance Officer is responsible for the maintenance of these books and records. The broker-dealer maintains certain books and records in electronic format for the firm. These include account registrations (a culmination of information from new account forms) and client e-mail correspondence. The firm maintains the following document types and forms that are not transmitted to custodians or broker-dealer: regulatory records, investment policies, financial plans, portfolio reviews, proposals, client correspondence excluding emails, and applications for direct investment company.

The firm utilizes cloud-based document storage through Box. Box uses 256-bit AES encryption and redundancy to assure security and uptime of the files. Box's corporate network and datacenters are continually tested in accordance with SSAE 16 Type II standards, and Box carries regularly updated third-party SOC1 and SOC2 certifications of their compliance. Box maintains their own SSAE 16 Type II certification and audits for their corporate operations and platform. Box's physical infrastructure is designed not only for disaster recovery, but true disaster avoidance, building in advanced measures for N+1 redundancy for all components, geographical diversity, physical security, and environmental controls. Access to systems is monitored around the clock by onsite monitoring and guards, and access to cages are restricted to only top-level clearance Box employees, managed by keys and biometric scanning.

In the event of an internal or external SBD that causes the loss of digital records, the records will be physically recovered from back-up storage in Box. If the primary site is inoperable, personnel will continue operations from a back-up site or an alternate location.

# **Financial and Operational Assessments**

#### **Operational Risk**

Client Communication: in the event of an SBD, managing members will immediately identify what means will be permitted to communicate with 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 website, telephone, voicemail, and secure e-mail.



In addition, we will retrieve key activity records as described in the section above, Data Back-Up and Recovery.

# **Mission Critical Systems**

We have primary responsibility for establishing and maintaining business relationships with customers and have sole responsibility for the firm's mission critical functions of order taking, order entry, and submitting to the custodian any request for distribution of funds. "Mission Critical Systems" are the systems and processes that allow the firm to fulfill these functions.

By utilizing National Financials', TD Ameritrade Institutional's or SEI's trading systems, or Charles Schwab we can place orders from anywhere we have secure internet access. Maintenance of books and records and client data files held in electronic format by a broker-dealer would also be accessed via a secure internet connection. These documents are also in the firm's cloud server.

Custodians provide execution, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Custodians will maintain a business continuity plan and the capacity to execute that plan. Custodians represent that it will advise of any material changes to its plan that might affect the ability to maintain business and present us with an executive summary of its plan. In the event one of the firm's custodians execute their plan, it represents that it will notify us of such execution and provide equal access to services as its other customers. If it is reasonably determined that the custodian has not or cannot put its plan in place quickly enough to meet the firm's needs or is otherwise unable to provide access to such services, custodian represents that it will assist in seeking services from an alternative source.

The broker-dealer represents in its business continuity plan summary that it is prepared to resume business in the event of an SBD. The broker-dealer will continue to conduct business during those disruptions and may choose to relocate key personnel and services to designated backup facilities. If the broker-dealer executes its plan, it will notify us of such execution and provide for alternate arrangements for conducting regular business.

Both the firm's broker-dealer and custodians represent that they back up records at a remote site. All firms represent that they operate a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. The broker-dealer and custodians have also confirmed the effectiveness of the back-up arrangements to recover from a wide scale disruption by testing and have confirmed that they test their back-up arrangements several times per year.



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. Both the broker-dealer and custodians have the following SBD recovery time and resumption objectives: recovery time period of within 4 hours and resumption time within the same business day.

# The Firm's Mission Critical Systems

### **Order Taking**

Currently, the firm receives orders from customers via in person or by 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 customers when communications become available to tell them what alternative they must send their orders to us. Customers will be informed of alternatives by web page, emails, and telephone.

# **Order Entry**

Currently, the firm executes customer orders by placing them electronically using custodians' trading platforms

#### Order Execution

In the event of an internal SBD, we will enter and send records to custodians by the fastest alternative means available, which include place customer orders by calling directly to the broker-dealer's trading desk. In the event of an external SBD, we will maintain the order in electronic or format, and deliver the order to the custodian by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer customers to deal directly with the custodian for order entry.

# **Other Services Currently Provided to Customers**

In addition to those services listed above in this section, account access via the internet is provided to clients to review their portfolio history by the custodian via the firm's website. Since this is a non-mission critical service, in the event of an internal SBD, the firm would temporarily not provide this service. Depending on the length and permanence of the disruption the firm would make a decision or when to restore the service. In the event of an external SBD, we would use the same decision-making process as the internal SBD.



# Mission Critical Systems Provided by Custodians

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

## Communication between Customers, Employees, & Regulators

#### Customers

We now communicate with customers using the telephone, e-mail, website, fax, U.S. mail, and in person visits at the firm or the client'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 have used in the past to communicate with the other party. For example, if we communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

# **Employees**

We now communicate with 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. Senior management will contact each other and establish the means and responsibility of who will contact the financial advisors and support staff.

# **Succession Planning**

The Firm has a succession plan in the event we have a significant event such as death or dismemberment to a key employee/owner. In the event an Investment Advisor Representative is unable to provide service to an account, the advisory responsibilities of those accounts will be transferred to another Advisor within the Firm. Those accounts will remain with the new Investment Advisor until the original Investment Advisor Representative is able to re-assume his/her responsibilities.

# Regulators

Arkadios Capital, a Broker Dealer some of the advisors maintain a relationship with, is a member of FINRA. 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. Employees will use phone provider's mobile access application for phone system continuation from remote locations.



# **Critical Business Constituents, Banks, and Counterparties**

#### **Business constituents**

We have contacted critical business constituents (businesses with which we have an ongoing commercial relationship in support of operating activities, such as vendors providing critical services), and determined the extent to which we can continue the business relationship with them considering 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 the firm. We maintain a supplemental contract with certain critical business constituents to provide such services. The alternative suppliers are disclosed below. The firm's major suppliers are:

Telephone and Internet:

Telephones: Firestorm Cyber (706-410-2966) www.firestormcyber.com

Internet: AT&T Business (800-321-2000) www.att.com

Email Provider: Microsoft Office provided by Firestorm Cyber (see above).

Web site: Twenty Over Ten www.twentyoverten.com

#### **Banks**

The firm has contracted banks and lenders to determine if they can continue to provide the financing that would be needed considering the internal or external SBD. The bank maintaining the firm's operating account is:

Wells Fargo Bank 7001 North Point Parkway, Alpharetta GA 30022; (770) 410-3800

## **Counterparties**

We will contact critical counterparties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out transactions with them considering the internal or external SBD. Where the transactions cannot be complete, we will work with custodians or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

# **Regulatory Reporting**

The firm is subject to regulation by: Securities and Exchange commission (SEC), the Financial Industry Regulatory Authority (FINRA), and various state regulators. The firm now files reports with regulators using paper copies in the U.S., mail, and electronically using fax, email, and the internet. In the event of an SBD, we will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us and use the means closest in speed and form (written or oral) to previous filing method(s). If we cannot contact



regulators, the firm will continue to file required reports using the communication means available.

# **Updates and Annual Review**

The firm will update this plan whenever there is a material change to operations, structure, business, or location or to those of the custodian(s). In addition, the firm will review this BCP annually, to modify it for any changes in the firm's operations, structure, business, or location or those of the custodian(s).

# **Senior Manager Approval**

The Business Continuity Plan has been approved as reasonably designed to enable the firm to meet its obligations to customers in the event of an SBD.