

# **Business Continuity Plan (BCP)**

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## **I. Emergency Contact Persons**

Our firm's two emergency contact persons are:

Robert Costomiris  
robert@myampny.com  
646-561-3388

Priscilla Orduna  
priscilla@myampny.com  
646-561-3372

These names will be updated in the event of a material change pursuant to Rule 1160 and NTM 07-42, and our Executive Representative will verify this information on an annual basis and will comply promptly with any request for such information.

*Rule: FINRA Rule 4370*

## **II. 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. 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, cyber attacks that may prohibit us from accessing critical operations applications, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

### **B. Approval and Execution Authority**

Robert Costomiris, CCO, is responsible for approving the plan and for conducting the required annual review. Robert Costomiris, CCO, has the authority to execute this BCP.

### **C. Plan Location and Access**

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

### **III. Business Description**

Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firms, which execute our orders, compare them, allocate them, clear and settle them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and deliver funds and securities. Our clearing firm is Sterne Agee Clearing Services.

### **IV. Office Locations**

#### **A. New York, NY**

This office is the corporate headquarters and is located at Three World Financial 200 Vesey St 24<sup>th</sup> Floor New York, NY, 10281. Its main telephone number is 646-532-2400. Our employees may travel to that office by means of foot, car, train, and bus. We engage in order taking and entry at this location.

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

In the event of an SBD, our staff will be instructed to work from home until an alternative site is determined.

*Rule: FINRA Rule 4370*

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

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm. 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 the home office.

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 4370; Securities Exchange Act Rule 15c3-1; 15 U.S.C. 78eee (2003).*

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

Our firm maintains its primary hard copy books and records and its electronic records at the home office.

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.

*Rule: FINRA Rule 4370.*

## **VIII. 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. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our Web site, telephone voice mail, and secure e-mail.

### **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 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.

*Rules: FINRA Rule 4370*

## **IX. 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.

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 represents that it will advise us of any material changes to its business continuity plan that might affect our ability to maintain our business. 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 maintains a business continuity plan, including redundant data centers and alternate processing facilities, to address interruptions to its normal course of business. These plans are reviewed annually and updated as necessary. The plans outline the actions the firm will take in the event of a building, city-wide, or regional incident, including relocating technology and operational personnel to pre-assigned alternate regional facilities. Technology data processing can also be switched to an alternate regional data center. All of the firm's operational facilities are equipped for resumption of business and are tested several times per year. The clearing firm's recovery time objective for business resumption, including those involving a relocation of personnel or technology, is four (4) hours. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond our control.

Our clearing firm further represents that in the event that we experience a significant business interruption, our clients may contact Sterne Agee Services directly to process limited trade-related transactions, cash disbursements, and security transfers. Instructions to the clearing firm must be in writing and transmitted via facsimile or by postal service as follows:

Sterne Agee & Leach, Inc.  
800 Shades Creek Parkway  
Suite 700  
Birmingham, AL 35209  
(800) 778-6257

The clearing firm provides additional information for our clients about how to request funds and securities if we cannot be contacted due to a significant business interruption via the Customer Support section on their website or via phone at (800) 778-6257 for recorded instructions.

## A. Our Firm's Mission Critical Systems

### 1. Order Taking

Currently, our firm receives orders from customers via telephone, fax, e-mail, or in person visits by the customer. 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 telephone, fax, e-mail and/or via our website. If necessary, we will advise our customers to place orders directly with our clearing firm.

### 2. Order Entry

Currently, our firm enters orders electronically or by telephone. 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 phone and fax. 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.

### 3. Order Execution

We currently do not execute orders.

## B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firms 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 Rule 4370*

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

### A. Customers

We now communicate with our customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits at our firm or at the other'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, if we have 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.

### 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. 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 phone numbers and email addresses.

### C. Regulators

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.

*Rule: FINRA Rule 4370*

## **XI. Critical Business Constituents, Banks, and Counter-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 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

### B. 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. If our banks and other lenders are unable to provide the financing, we will immediately seek alternative financing.

### 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 out 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.

Rules: *FINRA Rule 4370*

## **XII. Regulatory Reporting**

We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, 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.

Rules: *FINRA Rule 4370*

## **XIII. Disclosure of Business Continuity Plan**

We provide a copy of the BCP upon account opening and a disclosure statement will be posted on our Web site and mailed to customers upon request.

Rules: *FINRA Rule 4370*

## **XIV. 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 to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

Rules: *FINRA Rule 4370*

### *BCP DISCLOSURE STATEMENT*

The firm has created a Business Continuity Plan (BCP) that provides for the firm to continue client service within a reasonable amount of time, given the scope and severity of a significant business disruption (SBD).

The BCP anticipates responding to both internal and external SBDs. An internal SBD, such as the loss of our telephone system, affects only the firm. The firm will respond to internal SBDs by re-routing calls to secondary numbers, and/or relocating its primary office to a secondary location, and/or, recovering data from a back-up storage media and/or a back-up site. The firm expects to recover from an internal SBD within one hour.



An external SBD, such as a power outage or flood, affects multiple businesses and can be local, regional, national, or global. The firm's response to an external SBD relies more heavily on other organizations, such as the clearing firm and product sponsors. The firm expects to recover from an external SBD within six hours.

While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, the firm continually assesses and updates its BCP to mitigate all reasonable risk.

This disclosure is subject to modification. You may request a copy of the firm's full plan by contacting the firm at:

Allied Millennial Partners, LLC  
c/o Compliance Dept.  
Three World Financial  
200 Vesey St 24<sup>th</sup> Floor  
New York, NY 10281