

Business Continuity Plan

Asset Planners, Inc. (“API”) Business Continuity Plan (BCP)

Updated January 2023

I. Emergency Contact Persons

Our firm’s two emergency contact persons are:

Alan Stiffelman	O - 314.727.1177 alan@consolidatedstl.com
	C – 314.303.8430
Michael Mariani	O - 314.727.1177 mike@consolidatedstl.com
	C – 314.620.4629

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, 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

Alan Stiffelman, President, a registered principal, is responsible for approving the plan and for conducting the required annual review. Alan Stiffelman and Michael Mariani have the authority to execute this BCP.

C. Plan Location and Access

API will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on our server, NetshareCF, in the folder, Asset Planners/Compliance/BCP and on one CD-ROM, in our fireproof safe, and backed up to Sudora's iCloud-iDrive.

III. Business Description

API offers investment advisory services, primarily to high-net-worth families and individual investors. API offers planning tailored to the individual(s) situation. Planning services are offered in the following areas: Financial Planning, Retirement Planning, Education Planning, Asset Allocation, Equity Diversification, Estate Planning, Tax Planning, Insurance Planning, Cash Flow and Debt Management, Risk Management. API employs fundamental analysis and encourages a long-term approach utilizing buy-and-hold philosophies and investment strategies. The implementation of these strategies is based primarily upon the diversification and allocation of assets to the major asset classes utilizing low cost exchange traded funds

We do not hold customer funds or securities. We recommend, accept, and enter orders. All transactions are sent to our broker/dealer. Our firm services only retail customers. We do not engage in any private placements.

Our broker/dealer firm is:

Consolidated Financial Investments, Inc.
222 North Meramec
St. Louis, MO 63105
Main Telephone: 314-727-1177
Info@consolidatedstl.com
Todd Almlie: Telephone: 314-727-1177
Todd@consolidatedstl.com
<https://www.consolidatedstl.com>

IV. Office Location

API's only location is located at:

222 N Meramec Ave
Clayton, MO 63105-3702

Our main telephone number is (314) 727-1177. Our employees may travel to that office by means of foot, bike, car, or bus.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected office to the closest of our unaffected home locations. If none of our other home locations is available to receive those staff, all staff are able to work remotely from their homes.

VI. Customers' Access to Funds and Securities

API does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, RBC C&C. In the event of an internal or external SBD, if telephone service is available, our advisors will take customer orders or instructions and contact RBC C&C 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 Alan Stiffelman. CFII will make this information available to customers through our disclosure policy. RBC C&C does not have the infrastructure to take client calls.

If SIPC determines that CFII is 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. CFII will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

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

API maintains its primary hard copy books and records and its electronic records at 222 N Meramec Ave. Alan Stiffelman, President, (314) 727-1177 is responsible for the maintenance of these books and records.

API backs up its paper records by copying and taking them to our back-up site.

Liz Keister is responsible for the maintenance of the electronic storage back-up books and records. Todd Almlı is responsible for the maintenance of the electronic storage back-up of our email. Two copies are made monthly, one is kept in the office and one at our back-up site.

API maintains its back-up books and records and email (archived on our server) through two redundant clouds and a third shared-pc system. The two clouds, API maintains its back-up books and records and email (redundantly archived on our server) through two cloud services and a PC on the network names Shared-PC. The two cloud services, Intermedia (for email) and iDrive (for identified data repositories on the server and desktops), back up changes to existing files at least hourly with iDrive doing a full scan for new files daily. Shared-PC is holding a complete bootable backup of the server. The server updates this bootable backup hourly from 9 AM to 6 PM, Monday through Friday on network shared of Shared-PC using StorageCraft ShadowProtect. Backup failures are reported automatically by the system via email to our managed IT services company Sudora Computer Services. Using StorageCraft ImageManager, the hourly images are consolidated to preserve disk space into daily images after at least 7 days, into weekly images after at least 15 days and into monthly images after at least 90 days.

In the event of an internal or external SBD that causes the loss of our paper records, API will physically recover them from our back-up site. If our primary site is inoperable, API will continue operations from our back-up site or an alternate location. For the loss of electronic records, API 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.

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, API will immediately identify what means will permit us to communicate with our clients, 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 API will employ will include forwarding all of our phone numbers, our web site, www.consolidatedstl.com, and our companies secure e-mail, info@consolidatedstl.com. In addition, API will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). In the event that our mail server is unavailable, API will utilize our work e-mail from its remote online access www.office.com or personal e-mails @ hotmail.com and @ Yahoo.com. In the event our physical server is unavailable, API will utilize our VPN access to the server and also recover files from our cloud accesses.

B. Financial and Credit Risk

In the event of an SBD, API 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.

IX. Mission Critical Systems

API has primary responsibility for establishing and maintaining our business relationships with our clients. CFII and RBC C&C provide, 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.

API'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: RBC C&C's system (InfoWorks & BetaLink) available online via

any internet connection and a digital certificate download and our quote vendor, QUODD Financial Information Services, system available online via any internet connection, our email server available online via any internet connection through www.office.com, and our server available online via any internet connection through our VPN. In the event that the internet is unavailable we can operate by telephone.

CFII's contract with their clearing firm provides that RBC C&C will maintain a business continuity plan and the capacity to execute that plan. RBC C&C represents that it will advise us (via CFII) 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 RBC C&C executes its plan, it represents that it will notify us (via CFII) of such execution and provide us with equal access to services as its other customers. If we reasonably determine, or are advised by CFII, that RBC C&C 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, RBC C&C represents that it will assist us in seeking services from an alternative source.

RBC C&C represents that it backs up our shared records at a remote site. RBC C&C 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. RBC C&C 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 periodically.

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.

API has a 6000 running watt LPG generator and two Dell Inspiron 15 - 5000 Series laptop computers (with built-in WiFi and Bluetooth) for use during times of an SBD.

API relies on CFII and RBC C&C for order taking, order entry and order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and electronic access to customer accounts

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

A. Customers

API now communicates with our customers using the telephone, e-mail, our web site, fax, U.S. mail, and in-person visits at our firm. In the event of an SBD, API 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

API now communicates with our employees using the telephone, e-mail, and in person. In the event of an SBD, API 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. API 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 phone numbers. API has 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: Alan Stiffelman

Caller	Call Recipients
<i>Alan Stiffelman</i>	<i>Michael Mariani</i>

C. Regulators

API communicates with our regulators using the telephone, e-mail, fax, U.S. mail, and in person. In the event of an SBD, API 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.

XI. Critical Business Constituents and Broker-Dealer

A. Business constituents

API 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. Broker-Dealer

API has contacted our broker-dealer, CFII, 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, API will work with CFII or contact RBC C&C directly to make alternative arrangements to complete those transactions as soon as possible.

XII. Key Person Risk

A. Alan Stiffelman, Michael Mariani

In the event that Alan Stiffelman were to become unexpectedly incapacitated and/or deceased, all of his responsibilities and relationships would be immediately assumed by Michael Mariani until such time Alan was fit to return to API. In the event that Michael Mariani were to become unexpectedly incapacitated and/or deceased, all of his responsibilities and relationships would be immediately assumed by Alan Stiffelman until such time Michael was fit to return to API. In the event both Alan and Michael are simultaneously incapacitated and/or deceased, Todd Almli, at CFII, would notify all clients and facilitate any account transactions or transitions as needed.

XIII. Regulatory Reporting

API is subject to regulation by: SEC, FINRA, and the State of Missouri. API now files 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, API will check with the SEC, FINRA, and State of Missouri 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 API cannot contact our regulators, we will continue to file required reports using the communication means available to us.

SEC Headquarters
100 F St., NE
Washington, DC 20549-2000
(202) 942-8088
www.sec.gov
e-mail: help@sec.gov

SEC Midwest Regional Office
175 W Jackson Blvd Ste 1450
Chicago, IL 60604-2710
(312) 353-7390
www.sec.gov
e-mail: chicago@sec.gov
Joel R Levin, Regional Director

FINRA
Brendon Maloney
Denver District Office
4600 S. Syracuse St., Suite 1400
Denver, CO, 80237
(303) 446-3132
www.finra.org
e-mail: brendon.maloney@finra.org

State of Missouri
John R. Ashcroft
Secretary of State 600 W Main St
Department of Securities Jefferson City, MO
600 W. Main St.
Jefferson City MO 65101
573-751-4136

MSRB
1300 I St. NW, Ste 1000
Washington, DC 20005-3335
(202) 838-1500
(202) 898-1500 fax
www.msrb.org

XIV. Disclosure of Business Continuity Plan

API provides in writing a BCP disclosure statement to clients at account opening. API also posts the disclosure statement on our web site at www.consolidatedstl.com and mails it to customers upon request. Our disclosure statement is attached.

XV. Updates and Annual Review

API 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, API will review this BCP annually, on or before February 1 of each year, to modify it for any changes in our operations, structure, business or location or those of CFII.

TO: Designated Employees of API and Affiliated Persons with API

RE: Business Continuity Plan and Compliance Program

After carefully reviewing the enclosed material, please complete and sign the BCP Acknowledgment and promptly return.

BCP ACKNOWLEDGMENT:

I hereby acknowledge that I have read the API Business Continuity Plan and Compliance Program. I have become familiar with its contents and will comply with its terms.

Signature

Printed Name

Date

XVI. 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: _____

Title: _____

Date: _____