



Business Continuity Plan

April 2017

American Global Wealth Management Business Continuity Plan

I. Business Continuity Plan (“BCP”) Emergency Contact Persons

American Global Wealth Management (“AGWM” or “the Firm”) has designated two emergency contact persons:

Kevin Jokela, Chief Executive Officer (“CEO”)
Phone Number: 404-352-5050 (Office)
E-Mail: Kevin@AmericanGlobalWealth.com

Francois Bigot
Phone Number: 404-352-5050 (Office)
E-Mail: Francois@AmericanGlobalWealth.com

These contact persons will be designated as such in the FINRA Contact System. The

II. Firm Policy

In responding to Significant Business Disruptions (“SBDs”), AGWM will strive to safeguard employees’ lives and firm property, make a financial and operational assessment, quickly recover and resume operations, protect all of the firm’s books and records, and provide the means for customers to transact business. In the event that it is determined that AGWM is unable to continue its business, steps will be taken to provide customers with prompt access to their funds and securities.

A. Significant Business Disruptions

AGWM anticipates two kinds of SBDs, internal and external. Internal SBDs affect only AGWM’s ability to communicate and do business. External SBDs prevent the operation of the securities markets or a number of firms. AGWM’s response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of its clearing firm, Hilltop Securities, Inc. (“Hilltop”)

B. Approval and Execution Authority

Kevin Jokela, Chief Executive Officer, is responsible for approving this plan and executing this BCP and for conducting an annual review of its adequacy.

C. Plan Location and Access

AGWM will maintain copies of this BCP, copies of annual reviews of the plan, and any changes that have been made to the plan.

III. Business Description

AGWM conducts business in equities, fixed income securities, options, mutual funds, variable products and private placements for retail and institutional customers, cleared on a fully-disclosed basis through Hilltop. AGWM does not hold customer funds or securities and does not maintain proprietary trading accounts.

As noted above, AGWM's clearing firm is Hilltop Securities, Inc. located at:

1201 Elm Street, Suite 3500
Dallas, TX 75270
214.953.4000
800.678.3792
<http://www.Hilltopsecurities.com>

IV. Office Locations

AGWM's Office is at:

1600 Pennsylvania Avenue, Suite B
McDonough, GA 30253

Its main telephone number is 404-352-5050. The Firm's employees may travel to that office by means of foot, car, or bus. The Firm engages in order taking and order entry at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, AGWM will move its staff from affected offices to the closest of its unaffected office locations. If none of AGWM's other office locations is available to receive those staff, they will be moved to:

1010 Laurel Ridge Drive
McDonough, GA 30252
(678) 787 - 9376

VI. Customers' Access to Funds and Securities

AGWM does not maintain custody of customers' funds or securities; customer funds and securities are maintained at Hilltop. In the event of an internal or external SBD, if telephone service is available, AGWM's registered persons will take customer orders or instructions and contact Hilltop on their behalf. If AGWM's internet access is available, a posting will be placed on <http://www.wisconsindiscount.com> advising customers that they may access their funds and securities by contacting Hilltop or the product sponsor. AGWM will make this information available to customers through its disclosure policy.

If AGWM's net capital becomes deficient or its liabilities exceed its assets in violation of SEC Rule 15c3-1, FINRA and/or the Securities and Exchange Commission will require the Firm to cease operating. If AGWM is unable to rectify the deficiency immediately, it

will notify Hilltop so that arrangements can be made to ensure that customer accounts continue to be serviced.

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

AGWM maintains its primary hard copy books and records at:

1600 Pennsylvania Avenue
McDonough, GA 30253

AGWM backs up its paper records by scanning them to WinOps and backing them up on a server that is backed up nightly by its technology provider, RamTech.

In the event of an internal or external SBD that causes the loss of its paper records, AGWM will physically recover them from its back-up site. If its primary site is inoperable, AGWM will continue operations from its back-up site or an alternate location. For the loss of electronic records, AGWM will either physically recover the storage media or electronically recover data from its back-up site, or, if its primary site is inoperable, continue operations from its back-up site or an alternate location.

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, AGWM will immediately identify what means will permit it to communicate with 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 AGWM will employ will likely include its internet web site <http://www.wisconsindiscount.com/>, telephone voice mail at 414-352-5050 and email info@wisconsindiscount.com. In addition, AGWM will retrieve its key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

B. Financial and Credit Risk

In the event of an SBD, AGWM will determine the value and liquidity of its investments and other assets to evaluate its ability to continue to fund its operations and remain in net capital compliance. AGWM will contact Hilltop, critical banks, and investors to apprise them of its financial status. If AGWM determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, AGWM will request additional financing from its bank or other credit sources to fulfill its obligations to its customers and clients. If AGWM cannot remedy a net capital deficiency, it will file appropriate notices with FINRA and the Securities and Exchange Commission, and immediately take the steps set forth by SEC Rule 17a-11.

IX. Mission Critical Systems

AGWM'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: National Financial online and WinOps, a client data and commission system.

AGWM has primary responsibility for establishing and maintaining its business relationships with its customers and has sole responsibility for its mission critical functions of order taking and order entry with Hilltop. Hilltop 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.

AGWM's clearing agreement with Hilltop provides that Hilltop will maintain its own Business Continuity Plan and the capacity to execute that plan. Hilltop has represented that it will advise AGWM of any material changes to its Plan that might affect AGWM's ability to maintain its business and has provided AGWM with an executive summary of its plan, which is attached. In the event Hilltop executes its Plan, it has represented that it will notify AGWM of such execution and will provide AGWM equal access to services as its other customers. If AGWM reasonably determines that Hilltop has not or cannot put its Plan in place quickly enough to meet AGWM's needs, or is otherwise unable to provide access to such services, Hilltop has represented that it will assist AGWM in seeking services from an alternative source.

Hilltop has represented that it backs up AGWM's records at a remote out of region site. Hilltop has represented 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. Hilltop 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 annually.

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. Hilltop has the following SBD recovery time and resumption objectives: recovery time period of 4 hours *and* resumption time of the same day.

A. AGWM's Mission Critical Systems

1. Order Taking

Currently, AGWM receives orders from customers via phone, on-line or by personal visits by the customer. During an SBD, either internal or external, AGWM will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, AGWM will inform its customers when communications become available to tell them what alternatives they have to submit orders. Customers will be

informed of alternatives by AGWM's web site at www.wisconsindiscount.com. If necessary, AGWM will advise its customers to place orders directly with Hilltop at 800.678.3792

2. Order Entry

Currently, AGWM enters orders by electronically sending them to Hilltop through Hilltop's mainframe system. AGWM has contacted Hilltop and has been told that, under its BCP, AGWM can expect services within 2 hours of a SBD.

In the event of an internal SBD, AGWM will enter and send records to Hilltop by the fastest alternative means available, which include internet and telephone. In the event of an external SBD, AGWM will maintain the order in electronic or paper format, and deliver the order to Hilltop by the fastest means available when it resumes operations. In addition, during an internal SBD, AGWM may need to refer its customers to deal directly with Hilltop for order entry.

3. Order Execution

AGWM currently executes orders by online order entry. In the event of an SBD, internal or external, AGWM will call orders in to Hilltop's trading department.

B. Mission Critical Systems Provided by Hilltop

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

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

A. Customers

AGWM now communicates with its customers using AGWM's web site www.wisconsindiscount.com, by phone 414-352-5050, U.S. mail, and personal visits at the Firm or at other locations. In the event of an SBD, AGWM will assess which means of communication are still available, and use the means closest in speed and form (written or oral) to the means that were being used prior to the SBD.

B. Employees

AGWM now communicates with its employees using the telephone, e-mail, and in person. In the event of an SBD, AGWM will assess which means of communication are still available, and use the means closest in speed and form

(written or oral) to the means that were being used prior to the SBD. AGWM will also employ a call tree so that senior management can reach all employees quickly during an SBD. The CCO is authorized to initiate use of the call tree. AGWM's current call tree is as follows:

Caller	Call Recipients
<i>Kevin Jokela</i>	<i>Francois Bigot</i>
<i>Francois Bigot</i>	<i>Kevin Jokela</i>

C. Regulators

AGWM is a member of FINRA and MSRB and communicates with these regulators principally via telephone, e-mail, fax, and U.S. mail. In the event of an SBD, AGWM will assess which means of communication are still available and will use the means closest in speed and form to the means used prior to the SBD.

D. Bank

AGWM's banking partner is Fidelity Bank located at:

1375 Highway 20 West
McDonough, Georgia 30253.
770-914-4300

XI. Critical Business Constituents, Banks, and Counter-Parties

A. Business Constituents

AGWM has contacted its critical business constituents (businesses with which it has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which it can continue its business relationship with those constituents in light of the internal or external SBD. AGWM will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when it needs them because of a SBD to that constituent or AGWM.

B. Banks

AGWM has contacted its banks and lenders to determine if they can continue to provide the financing that AGWM will need in light of an internal or external SBD. The bank maintaining AGWM's operating account is Fidelity Bank located at:

1375 Highway 20 West
McDonough, Georgia 30253.

Should Fidelity Bank have a SBD their operations will continue according to their BCP which is attached.

C. Counter-Parties

AGWM has contacted its critical counter-parties, such as other broker-dealers and institutional customers, to determine if it will be able to carry out its transactions with them in light of an internal or external SBD. Where the transactions cannot be completed, AGWM will work with Hilltop or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

XII. Regulatory Reporting

AGWM now files reports with FINRA, MSRB, SEC, and other regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, AGWM will contact FINRA, the SEC, MSRB, and its other regulators to determine which means of filing are still available to us, and use the means closest in speed and form to the filing method used prior to the SBD. In the event that AGWM cannot contact its regulators, it will continue to file required reports using the communication means available.

XIII. Disclosure of Business Continuity Plan

AGWM provides a written BCP disclosure statement to customers at account opening, and annually thereafter. AGWM also posts the disclosure statement on its Web site and mails it to customers upon request. AGWM's disclosure statement is attached.

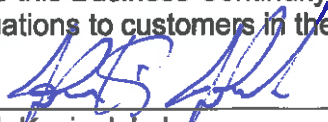
XIV. Updates and Annual Review

AGWM will update this plan whenever it has a material change to its operations, structure, business or location or to those of Hilltop. In addition, the CCO will review this BCP annually, to modify it for any changes in operations, structure, business, or location, or similar changes experienced by Hilltop.

XV. Senior Manager Approval

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

Signed:



J. Kevin Jokela

Title: Chief Executive Officer

