

FINANCIAL FREEDOM WMG, LLC EUGENE 21X4

[Branch name or DBA]

# BRANCH OFFICE BUSINESS CONTINUITY PLAN (BCP)

## UPDATES TO THE BRANCH OFFICE BUSINESS CONTINUITY PLAN TEMPLATE:

- Updated Template Formatting
- Updated LPL Financial Compliance Service Center Direct Contact Number

If you already have your plan documented, copy and paste the relevant sections to your existing plan document.

### Guidelines:

The attached template is provided to guide and support branch offices in fulfilling their regulatory requirement to create and maintain business continuity plans (BCPs) pursuant to the Branch Office Security Policy and to fulfill FINRA Rule 4370 (Business Continuity Plans) requirements.

### Instructions:

1. Complete all highlighted areas of the template with the relevant information.
2. Review the remainder of the plan for appropriateness based on your branch's specific situation
3. Review and sign the plan to fulfill the requirement to annually review and approve.
4. Perform an annual Business Continuity failover test per the guidelines included in Attachment C
5. Distribute to your key personnel who would have a role in enacting the plan.
6. Update as necessary upon any changes to your business.

The attached template is designed and intended for branch offices that rely upon LPL Financial as a technology and service provider, and may also leverage other operational services; this template includes language regarding the nature of this specific, limited relationship. If your branch conducts a different type of business then the template should be modified to describe the entities you rely on and the nature of those relationships. The obligation to develop a BCP is not a "one-size-fits-all" requirement, and **you must tailor your plan to fit your particular branch's situation.**

### Branch Office Security Policy Section 3.9:

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Branch Offices must create and maintain a written business continuity plan identifying procedures relating to an emergency or unplanned significant business disruption. Such procedures must be reasonably designed to enable the branch to meet its existing obligations to customers. Branches must also conduct an annual fail-over test and review of their business continuity plan to determine whether any modifications are necessary in light of changes to the branch's operations, structure, business, or location.

The elements that comprise a business continuity plan are flexible and may be tailored to the size and needs of a branch. Each plan, however, must at a minimum, address:

1. Data back-up and recovery (hard copy and electronic)
2. All mission critical systems
3. Financial and operational assessments
4. Alternate communications between customers and the branch
5. Alternate communications between the branch and its employees
6. Alternate physical location of employees
7. Critical business constituent, bank, and counter-party impact
8. Regulatory Reporting – LPL handles regulatory reporting on my behalf
9. Communications with regulators –LPL handles communication with regulators on my behalf
10. Plans to ensure customers' prompt access to their funds and securities in the event that the branch determines that is unable to continue its business. Clients are instructed to call LPL to access their funds. Hybrids are responsible to report their regulatory authority and have the capability for their clients to call someone to service their accounts.

**NOTE:** Please note that the above-listed elements are not exhaustive; you are accountable to address other key areas for your plan to be complete and thorough, based on your branch's business and operations.

# BRANCH OFFICE BUSINESS CONTINUITY PLAN | QUICK REFERENCE PLAN SUMMARY

## Backup Location/ Satellite Office

518 SW 3RD ST, CORVALLIS, OR 97333

Address

458-777-4458

Phone Number

## Call Tree

1. DJ WRIGHT

Name

458-777-4458

Phone Number

DAVID.J.WRIGHT@LPL.COM

Email

2. JASON HARRIS

Name

458-777-4458

Phone Number

JASON.HARRIS@LPL.COM

Email

LPL Financial 800

877-7210

Ext.

## Service Technician Emergency Contacts

### Electrician / Energy Provider Contact Info

CITIZENS BUILDING MANAGER-JANET BROWN

Name

541-687-9066/541-729-6955 CELL

Phone Number

JANET@CITIZENSBUILDING.COM

Email

Power/current outage website link

### IT / Internet Service Provider Contact Info

COMCAST BUSINESS

Name

800-391-3000

Phone Number

HTTPS://BUSINESS.COMCAST.COM/HELP-AND-SUPPORT/CONTACT-US/

Email

### Telecommunications Contact Info

ZOOM

Name

888-799-5926

Phone Number

HTTPS://ZOOM.COM

Email

### Plumber / Water Provider

CONTACT BUILDING MANAGER-SEE ABOVE

Name

Phone Number

Email

## BRANCH OFFICE BUSINESS CONTINUITY PLAN | QUICK REFERENCE PLAN SUMMARY

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### Data Backup and Recovery

LPL stores Books and Records for Corporate RIA and brokerage. If you are a Hybrid office, you are accountable to store your branch's Books and Records.

#### **Documents or records lost or damaged? (See Attachment C)**

All lists of paper documents/records impacted, damaged or lost must be submitted to LPL Financial through the Compliance Service Center at 1-844-610-0009.

Electronic copies are kept at LPL Financial.

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## I. BUSINESS CONTINUITY PLAN INTRODUCTION

This business continuity plan documents the response and recovery activities for

FINANCIAL FREEDOM WMG, LLC-EUGENE 21X4

, [Branch or DBA Name]

that conducts business in products that are available through LPL Financial's platform. The purpose of this guidance and template is to document the plan for the recovery of our critical business functions and systems in the event of an unplanned significant business disruption.

## II. EMERGENCY CONTACT PERSONS

LPL Financial provides FINRA with the contact information for two (2) emergency contact persons to fulfill this requirement for all branch office locations under LPL Financial. These 2 emergency contact persons are registered principles for LPL Financial. LPL Financial maintains compliance by updating this information upon any material change and reviewing the information quarterly to ensure it is current.

*Rule: FINRA Rule 4370(f); NASD Rule 1160.*

## III. BRANCH POLICY

Our branch's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and our property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of our branch'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 direct our customers to the LPL Financial service center at (800) 558-7567 for emergency assistance and access to their funds.

### a. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs impact only our branch'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 branches, 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 our primary service provider, LPL Financial.

### b. Approval and Execution Authority (On-site Manager/Advisor)

DJ WRIGHT-DIRECTOR OF INVESTMENTS/FINANCIAL ADVISOR

[Name, Title]

is accountable to review and approve the plan annually at a minimum or sooner if significant organization or operational changes occur.

DJ WRIGHT-DIRECTOR OF INVESTMENTS/FINANCIAL ADVISOR

[Name, Title]

has the authority to declare activation of this BCP and execute response and recovery activities.

### c. Plan Location and Access

Management of this branch will maintain both hard and soft 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:

WWW.FINANCIALFREEDOMWMG.COM

[Path and folder name where plan is located]

*Rule: FINRA Rule 4370(b), (d) and (e).*

Additionally, hard copies of the most current plan are distributed to the BCP approver, the manager, and other branch members responsibly for executing response and recover activities.

#### IV. BUSINESS DESCRIPTION

[State The Types Of Business That Your Branch Conducts.]

LPL Financial performs all clearing functions and holds customer funds or securities on our behalf. All transactions are sent to LPL Financial, which executes our orders, compares them, allocates them, clears and settles them. LPL Financial also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

LPL Financial is located at:

##### **Boston**

LPL Financial  
75 State St, 24th Floor  
Boston, MA 02108

##### **Carolinas (Fort Mill)**

LPL Financial  
1055 LPL Way  
Ft. Mill, SC 29715

##### **San Diego**

LPL Financial  
4707 Executive Drive  
San Diego, CA 92121

**Our contact number for LPL Financial is: (800) 877-7210**

#### V. OFFICE LOCATIONS: Our office locations are:

##### a. Office Location #1

FFWMG, LLC-NEWPORT

[Branch Name]

458-777-4458

[Phone Number]

1007 SW BAYLEY ST, NEWPORT, OR 97365

[Address]

WE CONDUCT BUSINESS IN EQUITY, FIXED & MUTUAL FUNDS. WE ACCEPT/ENTER ORDERS & SERVICE RETAIL

[Functions Performed At This Location]

##### b. Office Location #2 (if applicable)

FFWMG, LLC-SALEM

[Branch Name]

458-777-4458

[Phone Number]

1124 CORNUCOPIA ST NW, STE 101, SALEM, OR 97304

[Address]

WE CONDUCT BUSINESS IN EQUITY, FIXED & MUTUAL FUNDS. WE ACCEPT/ENTER ORDERS & SERVICE RETAIL

[Functions Performed At This Location]

#### VI. ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

In the event of an SBD, we will move our staff from impacted office(s) to the closest of our non-impacted office location(s). If none of our other office locations are available to receive those staff, they will be redirected to:

DJ WRIGHT-HIS RESIDENCE ADDRESS WILL BE GIVEN AT TIME OF SBD

[Address]

458-777-4458

[Phone Number]

*Rule: FINRA Rule 4370(c)(6).*



V. Office Locations cont.

c. Office Location #3

Corvallis 21X3, 518 SW 3<sup>rd</sup> St, Corvallis, OR 97333 Phone:  
458-777-4458

ci. Office Location #4

Eugene 21X4, 975 Oak St, Ste 670, Eugene, OR 97401 Phone:  
458-777-4458

cii. Office Location #5

Oregon Coast Bank 4702, 909 SE Bay Blvd, Newport, OR 97365  
Phone: 458-777-4458

For all locations:

We conduct business in equity, fixed and mutual funds. We accept and enter orders and service retail customers.

## VII. CUSTOMERS' ACCESS TO FUNDS AND SECURITIES

LPL Financial maintains custody of customers' funds or securities on our behalf. 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 LPL Financial on their behalf, and if our Web access is available, our branch will post on our website that customers may access their funds and securities by contacting LPL Financial at: (800) 558-7567.

If the Securities Investor Protection Corporation (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



[Any Additional Procedures]

*Rules: FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; see also 15 U.S.C. § 78eee.*

## VIII. DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)

### **Finra Guidance on Books and Records Maintained at the Impacted Locations**

*Members that maintained books and records at the impacted locations should make every effort to retrieve or back-up such records. If any such records were permanently destroyed, a list of the types of books and records required to be maintained pursuant to NASD Rule 4510 and SEA Rules 17a-3 and 17a-4 must be prepared. The list should include the time periods impacted, but need not include records that can be recreated from an electronic database or that can be retrieved otherwise from a service bureau, back-up records storage facility, etc. All such lists must be submitted to LPL Financial through the Compliance Service Center at 1 (844) 610-0009.*

LPL stores Books and Records for Corporate RIA and brokerage.

### **If you have damage to your records:**

1. Do not destroy the records until instructed it is ok to do so.
2. Inventory the damaged paper records using the damaged records log in Attachment B of this plan.

**HYBRID OFFICE ONLY TO FILL IN FOLLOWING SECTION:**

If you are a Hybrid office, it is your responsibility to record & document Books and Records here:

Our branch maintains its primary hard copy books and records at:

N/A

[Name]

[Address]

Our branch maintains its primary electronic records at:

LPL FINANCIAL-CLIENTWORKS

[Name]

75 STATE ST, 24TH FLOOR, BOSTON, MA 02108

[Address]

[Name, Title, Phone Number] is responsible for the maintenance of these books and records. Our branch maintains the following document types and forms that are not transmitted to LPL Financial: [List Document Types And Forms, Such As New Account Forms, Etc.]

NONE

Our branch maintains backup hard copy books and records at:

N/A

[Name]

[Address]

Responsible Party:

N/A

[Name Of Person Responsible For Back Up]

Backup Frequency:

DAILY

[Frequency Records Are Backed Up]

The document types and forms that are backed up are:

ALL FORMS

[List Types Of Documents Backed Up]

Our branch backs up electronic records at:

LPL FINANCIAL-CLIENTWORKS

[Name]

75 STATE ST, 24TH FLOOR, BOSTON, MA 02108

[Address]

Responsible Party:

N/A

[Name Of Person Responsible For Back Up]

Backup Frequency:

DAILY

[Frequency Records Are Backed Up]

The document types and forms that are backed up are:

ALL FORMS

[List Types Of Documents Backed Up]

We back up electronic records

DAILY

[Enter Frequency] by LPL FINANCIAL

VIA CLIENTWORKS

[Describe Process]

and copies are kept at

SAME AS ABOVE

[Other Address; May Be The Same As Hard Copy Back-Up Site]

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(c)(1).*

## IX. FINANCIAL AND OPERATIONAL ASSESSMENTS

### a. Operational Risk

In the event of an SBD, we will immediately leverage all alternate communication modalities (landline, cell phone, email, fax, web announcement, and etc.) available that will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). If needed, we will direct customers to LPL Financial at: (800) 558-7567.

*Rules: FINRA Rules 4370(c)(3), (c)(4), (c)(5), (c)(7), (c)(9 & (g)(2)).*

### 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 LPL Financial, 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 the appropriate steps.

*Rules: FINRA Rules 4370(c)(3), (c)(8) & (g)(2).*

## X. MISSION CRITICAL SYSTEMS

“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, entry and execution. LPL Financial provides the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

### Our Branch's Mission Critical Systems

#### **Order Taking**

Currently, we receive orders from customers via telephone, or in person. 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. If customers are unable to reach the branch to place trades they can contact LPL Financial's Service Center at (800) 558-7567.

#### **Order Entry**

We enter orders by recording them on paper and sending them to LPL Financial telephonically, or electronically through LPL Financial's BranchNet/ClientWorks platform.

## **Internal**

In the event of an internal SBD, we will contact LPL Financial by the fastest means available and/or refer our clients to work directly with LPL Financial for order entry.

## **External**

In the event of an external SBD that does not impact LPL Financial, we will keep the order in the appropriate format and deliver back to LPL in proper format. For external SBDs that impact LPL Financial, LPL Financial's BranchNet/ClientWorks platform expected recovery is within 4 hours or less per their internal Recovery Time Objective.

## **Order Execution**

LPL Financial executes orders on our behalf. LPL Financial's Fort Mill and San Diego offices serve as primary locations for Trade Execution. Each office serves as reciprocal backup for the other. LPL Financial has documented and tested internal business continuity and disaster recovery plans in place to provide for a fail-over between the two sites.

## **Mission Critical Systems Provided by LPL Financial**

Our branch relies on LPL Financial to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

LPL Financial backs up our data at a remote site. LPL Financial's Fort Mill and San Diego offices serve as primary locations for mission-critical processing, including: Operations, Trade Execution and Processing, and the Service Center. Each office serves as a reciprocal backup for the other. LPL Financial has documented and tested internal business continuity and disaster recovery plans in place to provide for a fail-over between the two sites.

*Rules: FINRA Rules 3510(c)(2) & (g)(1).*

## **XI. ALTERNATE COMMUNICATIONS BETWEEN THE FIRM AND CUSTOMERS, EMPLOYEES, AND REGULATORS**

### **a. Customers**

We communicate with our customers using the telephone, email, our website, fax, U.S. mail and in-person visits at our office or another location. In the event of an SBD, we will assess which means of communication are still available to us.

We will use whatever means of communication available including email, phone, our website or updating our voicemail to instruct our clients to contact the **LPL Financial client line, (800) 558-7567**, if we are unable to transact business for them due to power or network outages.

*Rule: FINRA Rule 4370(c)(4).*

### **b. Employees**

We now communicate with our employees using telephone, email, 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 home and office phone numbers. We have 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: DJ WRIGHT

Caller	Call Recipients	Call Recipients
DJ WRIGHT	JASON HARRIS/JULIA CARLSON	JENNIFER WEBSTER
JULIA CARLSON	AMY CARLSON/JESSICA BEASLEY	
AMY CARLSON	SUSAN BEHR/PATI LONERGAN	
PATI LONERGAN	MATT BECK/HALEY PATTON	LOURDES LOZANO
JASON HARRIS	CHRISTA EHMKE	ETHAN FISCHER/YORK MENDOZA
JENNIFER WEBSTER	ALLISON FORMAN/TAYLOR ISAAC	
ALLISON FORMAN	DREW FORQUER/JOHN BERNARDIO	JARON BOS/SAM LEE/JAMIE YEANEY

[e.g., Person A, Person C]

[e.g., Person B, Person C, Person D Person E.]

*Rule: FINRA Rule 4370(c)(5).*

**c. Regulators**

We communicate with our regulators using telephone, email, 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(c)(9).*

**XII. CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES**

**a. Business constituents**

Critical business constituents are businesses with which we have an ongoing commercial relationship in support of our operating activities such as vendors providing critical services. LPL Financial provides most of our critical services. 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.

Our other critical business constituents are:

Business Constituent	Services Provided	Alternatives in the event they are unavailable:
SALESFORCE	CRM/DOCUMENTATION	HISTORICAL BACKUP RECORDS

*Rules: FINRA Rule 4370(c)(7).*

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. The bank maintaining our operating account is:

OREGON COAST BANK

[Bank / Lender Name]

541-265-9000

[Phone Number]

909 SE BAY BLVD, NEWPORT, OR 97365

[Address]

ROBYN SHEPRO

[Contact]

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from:

1ST SECURITY BANK

[Bank / Lender Name]

541-265-6666

[Phone Number]

506 SW COAST HWY, NEWPORT, OR 97365

[Address]

*Rules: FINRA Rule 4370(c)(7).*

c. **Counter-Parties**

LPL Financial maintains the relationships with our critical counter-parties on our behalf. Where the transactions cannot be completed, we will work with LPL Financial or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

*Rules: FINRA Rule 4370(c)(7).*

XIII. REGULATORY REPORTING

[Describe how your firm will file its regulatory reports in the event of an SBD.]

LPL will file regulatory reports on our behalf (unless you are a hybrid RIA)

*Rule: FINRA Rule 4370(c)(8).*



XIV. DISCLOSURE OF BUSINESS CONTINUITY PLAN

LPL Financial has a BCP disclosure statement that is provided to our customers at account opening and attached to this document as "Attachment A" The BCP Disclosure statement is also posted to [www.lpl.com](http://www.lpl.com) and mailed to customers upon request.

*Rule: FINRA Rule 4370(e).*

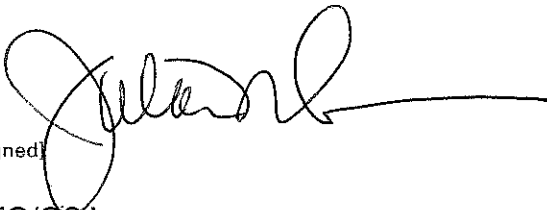
XV. UPDATES AND ANNUAL REVIEW

We will test our plan on an annual basis (see attachment B), and update this plan as an outcome of the test, or whenever we have a material change to our operations, structure, business or location or to those of LPL Financial. 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 LPL Financial. *Rule: FINRA Rule 4370(b).*

XVI. ONSITE MANAGER/ADVISOR APPROVAL

I have reviewed the annual test results, and approve the testing and this Business Continuity Plan as reasonably designed to enable our branch to meet its obligations to customers in the event of an SBD.

*Rule: FINRA Rule 4370(d).*



[Signed]

CEO/OSJ

[Title]

[Date]

6/6/2025