

## **I. Emergency Contact Persons**

Our firm's emergency contact persons are:

Joseph W. Harrison	<a href="mailto:joe@jwharrison.com">joe@jwharrison.com</a>	925.289.6701	Principal
Bryan Hasling	<a href="mailto:bryan@jwharrison.com">bryan@jwharrison.com</a>	972.948.7487	Senior Planner
Anthony Smith	<a href="mailto:anthony@jwharrison.com">anthony@jwharrison.com</a>	860.302.5386	Associate Planner
Alona Harrison	<a href="mailto:info@jwharrison.com">info@jwharrison.com</a>	415.786.7301	Marketing

## **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**

Joseph Harrison, a registered principal, is responsible for approving the plan and for conducting the required annual review. Joseph Harrison or Alona Harrison has the authority to execute this BCP.

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

Our firm 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 at:

[http://jwharrison.com/pdfs/JW\\_Harrison\\_Business\\_Continuity\\_Plan.pdf](http://jwharrison.com/pdfs/JW_Harrison_Business_Continuity_Plan.pdf).

## **III. Business Description**

Our firm conducts business in equity, fixed income, and derivative securities. 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 firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only retail customers. We do not engage in any private placements.

Our clearing firm is:

Charles Schwab & Co., Inc.  
P.O. Box 52013  
Phoenix, AZ 85072-2013  
877-711-2982 (Opt 3) (AK, WA, OR, NV, AZ)  
877-774-3892 (Opt 3) (CA, HI)  
Fax: 800-487-0368  
Email: [ascorphenix@schwab.com](mailto:ascorphenix@schwab.com)

#### **IV. Office Locations**

Our firm has an office located at:

1655 N Main St., Ste 390  
Walnut Creek, CA 94596

Its main telephone number is:

925.271.5521

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

In the event of an SBD, we will move our staff from the affected office(s) to the closest of our unaffected office location(s). If none of our other office locations is available to receive those staff, we will move them to the home office of Joseph W. Harrison:

2333 Dapplegray Lane  
Walnut Creek, CA 94596  
925.930.6202

#### **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, Charles Schwab and Co. 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 website that customers may access their funds and securities by contacting Charles Schwab and Co. The firm will make this information available to customers through its disclosure policy.

#### **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 our Walnut Creek office. Joseph Harrison, Principal, 925.289.6701, is responsible for the maintenance of these books and records.

The firm backs up its electronic records in real time to the "cloud" via Microsoft365 OneDrive for Business.

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.

## **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 website, telephone voice mail, and secure email. In addition, we will retrieve our 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, 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.

## **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. More specifically, these systems include: Morningstar Office, Microsoft Office (Outlook Exchange, Excel, and Word), and Adobe PDF.

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 and execution. Our clearing firm provides, through contract, 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 clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its 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 backs up our records at a remote site. Our clearing firm 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. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

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.

Joseph W. Harrison will periodically review our clearing firm's capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

A. Our Firm's Mission Critical Systems

**1. Order Taking**

Currently, our firm receives orders from customers via telephone, fax, email, text messaging, 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, email, text messaging, or website notification. If necessary, we will advise our customers to place orders directly with our clearing firm.

**2. Order Entry**

Currently, our firm enters orders by recording them electronically and sending them to our clearing firm electronically or telephonically.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available. 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.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide [order execution], order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

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

A. Customers

We communicate with our customers via telephone, fax, email, text messaging, in-person visits, and via our website. 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 email 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 communicate with our employees via telephone, fax, email, text messaging, in-person visits, and via our website. 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: Joseph W. Harrison

Caller	Call Recipients
<i>Joseph W. Harrison</i>	<i>Alona Harrison, Bryan Hasling, Anthony Smith</i>

### C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by: California Department of Corporations. We communicate with our regulators using telephone, email, fax, and physical mail. 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.

## 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. Our major suppliers are: Network Solutions ([www.networksolutions.com](http://www.networksolutions.com)) and Morningstar ([www.morningstar.com](http://www.morningstar.com)).

### 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: Chase Bank ([www.chase.com](http://www.chase.com)).

### C. Counter-Parties

We have contacted our critical counterparties, 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 counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

## XII. Regulatory Reporting

Our firm is subject to regulation by: California Department of Corporations. We now file reports with our 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 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.

## XIII. Disclosure of Business Continuity Plan

Attached is our written BCP disclosure statement we provide customers at account opening. We also post the disclosure statement on our website and mail it to customers upon request.

## 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, on January 1, to modify it for any changes in our operations, structure, business or location or those of our clearing firm.

**XV. 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:

A handwritten signature in black ink, appearing to read "Joe Harrison", is written over a light gray rectangular background.

Title:

Joseph W. Harrison, Principal

Date:

July 1, 2018

**JW Harrison Financial, Inc.'s Business Continuity Planning**

JW Harrison Financial, Inc., has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at 925.271.5521, you should call or text us via our alternative number 925.289.6701, write us via [joe@jwharrison.com](mailto:joe@jwharrison.com) or [info@jwharrison.com](mailto:info@jwharrison.com) or go to our website at [www.jwharrison.com](http://www.jwharrison.com). If you cannot access us through any of those means, you should contact our clearing firm, Charles Schwab at: [www.schwaballiance.com](http://www.schwaballiance.com); 877-711-2982 (Opt 3); 877-774-3892 (Opt 3); [ascorphenix@schwab.com](mailto:ascorphenix@schwab.com)

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Charles Schwab, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments as soon as possible. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within one business day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within one week. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website, [www.jwharrison.com](http://www.jwharrison.com), or our customer emergency number, 925.289.6701, how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at [info@jwharrison.com](mailto:info@jwharrison.com).