

M. Griffith Investment Services, Inc.
Business Continuity Plan Summary (BCP)
Regarding M. Griffith Investment Service, Inc.'s
Business Recovery Plan

I. Emergency Contact Persons

Our firm's two emergency contact persons are: David T. Griffith, President (315-797-0130 or dgriffith@mgriffithinc.com) and Cathy Cucharale, Vice President Operations (315-738-4562 or ccucharale@mgriffithinc.com). These names will be updated in the event of a material change, and Cathy Cucharale will review them within 17 business days of the end of each quarter.

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)

There are 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 or other vendor.

B. Approval and Execution Authority

David T. Griffith, President, a registered principal, is responsible for approving the Plan and for conducting the required annual review. David T. Griffith, President or Cathy Cucharale, Vice President Operations has the authority to execute the M. Griffith Investment Services, Inc. Business Recovery Plan (the Plan).

C. Plan Location and Access

Our firm will maintain copies of this BCP plan summary, the Business Recovery Plan, and the annual review and/or testing of the Plan for inspection. An electronic copy of this BCP plan summary is located on the M. Griffith Investment Services, Inc. website at www.mgriffithinc.com. Physical hard copies of the M. Griffith Investment Services, Inc.

Business Recovery Plan are located on and off site with all senior management as denoted in the Plan.

III. Business Description

Our firm conducts business in equity, fixed income, mutual funds, insurance and annuities. 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 either sent to our clearing firm or directly to one of our vendors (such as an insurance company, mutual fund company or annuity company), which are responsible for executing our orders, comparing them, allocating them, clearing and settling them. Our clearing firm or other vendor also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only retail customers.

IV. Office Locations

Our office is located at 555 French Road, Building 2, New Hartford, NY 13413. Its main telephone number is 315-797-0130. All order processing and client service functions are conducted from this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we may be required to move our staff from the affected office above to another unaffected location. In the event that this re-location was to occur, the new address location would be announced on the M. Griffith Investment Services, Inc. website, on our main office phone number's voicemail at 315-797-0130 and/or on television, radio and/or newspaper.

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. All funds or securities are maintained at our clearing firm, First Clearing, LLC or at one of our other vendors. In the event of an internal or external SBD, if telephone service is available, our Financial Consultants will take customer orders or instructions and contact our clearing firm and/or other vendor, on their behalf. In the event telephone service is not available, we will communicate with our clearing firm or other vendor by the means closest in speed and form (written or oral) to the means we have used in the past such as email, fax and/or U.S. mail.

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 555 French Road, Building 2, New Hartford, NY 13413. Each of our Financial Consultants as well as the operations department, are responsible for the maintenance of these books and records.

At this time, M. Griffith Investment Services, Inc. is electronically backing up client information and storing it securely off site for easy access if recovery is required. M. Griffith Investment Services, Inc. intends to restore all hardcopy documentation that has not been previously stored electronically, as addressed in the Business Recovery Plan utilizing the methods described in the Plan. In the event that the hardcopy documentation was not restorable, M. Griffith Investment Services, Inc. would contact FCC and various vendors where accounts are held for back up. FCC would be able to provide M. Griffith Investment Services, Inc. with copies of all new account documentation, either electronically or in hard copy form if needed in a recovery situation. All vendors other than FCC would be able to provide M. Griffith Investment Services, Inc. with copies of applications and transaction paperwork, either electronically or in hard copy if needed in a recovery situation.

Computer systems/servers are backed up on a regular basis with a minimum ten-business day rotation securely stored off-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.

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, e-mail, and/or cell phone as described in our Business Recovery Plan. 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.

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. 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 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 location. 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.

A. Our Firm’s Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from customers via in person visits by the customer or telephone. 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.

2. Order Entry and Execution

Currently, our firm enters orders by sending them to our clearing firm electronically or telephonically for execution. In the event of a SBD, we will continue to process our orders in the same manner either from our office location or an alternate recovery site.

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.

3. Other Services Currently Provided to Customers

In addition to those services listed above in this section we also offer our clients the convenience of issuing checks and making deposits. In the event of an internal or external SBD, we would be able to continue offering these services through First Clearing, LLC.

A. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order entry (if needed), order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

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 other 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 an employee list so that senior management can reach all employees quickly during an SBD. The employee list includes all staff home and cell phone numbers.

David T. Griffith, President and/or Cathy Cucharale, Vice President Operations are considered key personnel in the event of an SBD. Either of these people, whoever is first contacted regarding the SBD by authorities, will insure to contact the other to begin the contact of M. Griffith Investment Services, Inc. staff via the phone numbers provided in the M. Griffith Investment Services, Inc. Business Recovery Plan.

C. Regulators

We are currently members of FINRA. We communicate with our regulators using the telephone, e-mail, fax, and U.S. 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 and Banks

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. Most of our critical business constituents will provide key elements to our business recovery as stated in the Plan. 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 their organization.

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.

XII. Regulatory Reporting

Our firm is subject to regulation by the SEC and FINRA. 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, electronically or oral) to our previous filing method per the information available in the M. Griffith Investment Services, Inc. Business Recovery Plan.

XIII. Disclosure of Business Continuity Plan

We disclose this BCP plan summary to customers on our website and advise them at account opening that it is available for them to download directly or it can be mailed to customers upon request.

XIV. Updates and Annual Review

Our firm will update the Plan whenever we have a material change to our operations, structure, business, location or to those of our clearing firm. In addition, our firm will review the M. Griffith Investment Services, Inc. Business Recovery Plan annually, to modify it for any changes in our operations, structure, business, location or those of our clearing firm.

XV. Senior Manager Approval

David T. Griffith has approved this Business Continuity Plan summary and the M. Griffith Investment Services, Inc. Business Recovery Plan as denoted by his signature on the cover page of the Plan and agrees that the Plan is reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.