



BUSINESS CONTINUITY & SUCCESSION PLAN

FORTUNE ADVISORY SERVICES

987 EAST 94TH STREET
BROOKLYN NY 11236

www.fortuneadvisoryllc.com

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PREPARED/APPROVED BY	ROBERT FORTUNE	TITLE	OWNER	DATE	03/12/2019
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1. OVERVIEW

Fortune Advisory Services (FAS) has a policy in place to respond to a Significant Business Disruption (SBD). In the event of an SBD, our policy is to safeguard our employees' lives and Firm property, to conduct a rapid financial and operational assessment, to recover quickly and resume operations swiftly, to protect the Firm's books and records, and to allow FAS's clients to transact business seamlessly. If it is determined the Firm is unable to continue its business, FAS will assure clients prompt access to their funds and securities.

2. EMERGENCY CONTACT INFORMATION

PRIMARY CONTACT	Robert Fortune	SECONDARY CONTACT	Shareholders Service Group
TITLE	Owner	TITLE	Backoffice Admin
ADDRESS	987 E 94th St Brooklyn NY 11236	ADDRESS	9845 Erma Rd Ste 312 San Diego CA 92131
PRIMARY PHONE	3472063010	PRIMARY PHONE	8003807370
SECONDARY PHONE	6464619936	SECONDARY PHONE	N/A
EMAIL	rfortune@fortuneadvisoryllc.com	EMAIL	service@shareholdersgroup.com

3. ALTERNATE BUSINESS SITE

In the event of an SBD, we will move our staff from affected offices to:

675 3rd Ave Ste 900 New York NY 10017
646-461-9936.



4. CLIENT COMMUNICATION

In the event of an emergency or significant business disruption, clients can obtain up-to-date information regarding the operating status of the firm and contact information from the firm's website, www.fortuneadvisoryllc.com.com, or by calling the firm's main numbers, listed above.

5. CLIENT ACCESS TO FUNDS & SECURITIES

Our firm does not maintain custody of customers' funds or securities. All asset management client assets are held at Pershing LLC. These organizations maintain their own BCP and, in the event of an internal or external SBD, we will work with our clients to make them aware of the BCP and help them navigate the processes to access their funds and securities.

In the event the SIPC should determine that any custodian is unable to meet their obligations to customers, SIPC may seek to appoint a trustee to disburse the custodian's assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

6. RECORDS BACKUP

Our firm maintains its primary hard copy books and records and its electronic records at Fortune Advisory Services LLC. Robert Fortune is responsible for the maintenance of these books and records. We generally scan original client documents and save them on a redundant cloud-based storage platform (currently Google Drive). Unless original hard copy documents are required to be retained, we shred the originals and maintain the records in electronic format. In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover client records from the custodian firms. 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.

7. 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 telephone, voice mail and 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 service our clients. We will contact our custodian firm, clients, and critical banks 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 our financial situation, we will file appropriate notices with our regulators and immediately take appropriate steps, including instructing our clients to contact their custodians immediately and from that point forward.



8. ALTERNATE COMMUNICATION PROCEDURES

A. CUSTOMERS

We now communicate with our customers using the telephone, fax, email, U.S. mail, and in person visits at our firm or at other locations. 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

Since our firm has no employees other than R. Fortune, there is no need for an employee communication strategy.

9. MISSION CRITICAL SYSTEMS

A. TRADING

Currently, our Firm enters trades electronically and transmits them to our custodial Firm electronically or telephonically. In the event of an internal SBD, we will enter and transmit records to our custodial Firm by the fastest alternative means available. In the event of an external SBD, we will maintain orders in electronic or paper format, and deliver orders to our custodial firm by the fastest means available, when it resumes operations. Also, during an internal SBD, we may refer our clients to deal directly with our custodial firm for order entry.

B. CLIENT ACCOUNT INFORMATION

We currently access client account information via our custodial Firm website & trading platform. In the event of an internal SBD, we would access client information via fax correspondence, alternate phone systems, etc.



10. DEATH OF KEY PERSONNEL

The following personnel is identified as "Key Personnel" without which it would be difficult or impossible to continue operating the firm and properly service clients (day-to-day operations):

Robert Fortune, Investment Manager & CEO

If some event made it impossible for the person listed above able to continue to service the firm, clients of the firm would, with little difficulty, be able to obtain similar services elsewhere. Their brokerage accounts would not depend on the well-being of the key personnel.

11. 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 to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.