

Paradigm Consulting, Inc.'s Business Recovery Continuity Planning

Paradigm Consulting, Inc. has developed a Business Recovery 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 recovery continuity plan.

Contacting Us – If after a **significant** business disruption you cannot contact us as you usually do at 315-797-8400 or through your representative's direct phone number, you should go to our website at www.paradigmci.com, email us at information@paradigmci.com or send us a fax at 315-797-8403. If you cannot access us through any of those means, you should contact our broker-dealer, Royal Alliance Associates, Inc. at 800-821-5100 or our clearing firm, Pershing LLC's Customer Support line at 201-413-3635 for instructions on how they may assist you with your account held with them such as providing prompt access to your funds and securities, entering orders and processing other trade, cash or security related transactions. If your account is not held with Royal Alliance Associates but at another vendor such as a mutual fund or insurance company, please reference the contact information that is printed directly on your statement.

Our Business Recovery 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 recovery 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.

In addition, our broker-dealer Royal Alliance Associates, Inc. and our clearing firm, Pershing LLC, back 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, please note that 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 24 – 48 hours. 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 24 – 48 hours. In either situation, we plan to continue in business, transfer operations to our broker-dealer or clearing firm if necessary, and notify you through our website www.paradigmci.com or through a recording on our main phone number for the firm at 315-797-8400 on 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 our compliance department at 315-797-8400 or by emailing us at informaton@paradigmci.com.