

I. Emergency Contact Persons

Our firm's two emergency contact persons are:

Stephen T. Hawbaker
Stone Quarry Crossing
811 Camp Horne Road
Pittsburgh, Pennsylvania 15237
412.367.3880
shawbaker@alleghenyfinancial.com

Joseph Marstellar
Stone Quarry Crossing
811 Camp Horne Road
Pittsburgh, Pennsylvania 15237
412.367.3880
jmarstellar@alleghenyfinancial.com

These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days after the end of the calendar year.

Rule: FINRA Rule 4370(f), NASD Rule 1160.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding clients' and 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. If 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 several 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: National Financial Services, LLC (NFS).

B. Approval and Execution Authority

The Business Continuity Committee is responsible for designing the plan and for conducting the required annual review. The plan will be approved by a Supervising Principal and a member of the Board of Directors. Either of the designated Emergency Contact Persons or any other member of the Board of Directors have 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 maintained within the Compliance Department on our firm's network.

III. Business Description

Allegheny Financial Group is a Registered Investment Advisor; Allegheny Investments is a Registered Investment Advisor and a Broker/Dealer. Allegheny conducts business in equity, fixed income, debt, private placements, and variable securities. Our firm is primarily an introducing firm. We accept and enter orders. Most of our transactions are sent to our clearing firms which execute our orders, compare them, allocate them, clear and settle them. NFS also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

Other transactions are done directly with mutual funds. The mutual funds maintain our customers' names, can grant customers access to information, and can redeem the investments.

We offer private placements. Allegheny maintains the names of all investors and can provide access to information.

NFS's Contact Information:

National Financial Services, LLC
245 Summer Street
Boston, MA 02210
617.563.7000

Mailing Address:

National Financial Services, LLC
Two Destiny Way
Mail Zone: WG3D
West Lake, TX 76092
617.563.7000

IV. Office Locations

Our Firm has offices located in Pittsburgh, Pennsylvania, and surrounding states.

A. Office Location #1

Our Main Office is located at:

Stone Quarry Crossing
811 Camp Horne Road
Pittsburgh, PA 15237
412.367.3880

Our employees may travel to the above office location by the following means: foot, car, bus, or plane. We engage in order taking and entry at this location.

B. Office Location #2

Please see the attached list of branch offices, referred to herein as Exhibit 1 for a full and complete listing of all Allegheny branch offices. In the event of an SBD at our main office, our employees may travel to any of these office locations by the following means: foot, car, train, bus, or plane. Each branch location is equipped to engage in the same types of activities that we conduct at our primary office. The individuals who have authority to enact this plan will communicate with staff which office is appropriate according to the severity of the SBD.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected offices to the closest of our unaffected office locations. If none of our office locations are available, we will move our operations to one of the following locations:

ACA Global
Foster Plaza 6
Pittsburgh, PA 15220
724.935.6791

Rule: FINRA Rule 4370(c) (6)

There may be events, other than a defined SBD, which would permit operations to continue but require Allegheny to close our physical office location. In that event, Allegheny will implement work from home (WFH) provisions.

WFH staff will relocate to their primary residence and access Allegheny systems remotely. Allegheny has defined limited Essential Staff (ES) that are required to remain on site to support WFH.

Essential Staff: Number of, and specific staff member(s) will be identified based on the scope of the WFH mandate.

- Information Technology (IT)
- Operations
- Compliance/Mail Processing
- Accounting

VI. Customers' Access to Funds and Securities

Allegheny does not custody client funds or securities. Most of our accounts are maintained at NFS. Other of our clients' investments are placed directly with the mutual fund provider or insurance company. 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 the appropriate entity on their behalf, and if our web access is available, the Marketing Manager will be responsible for posting a notice on our website that customers may access their funds and securities by contacting NFS, the insurance companies, or the fund company directly. The firm will make this information available to customers through its disclosure policy.

If 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.

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

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 811 Camp Horne Road, Pittsburgh, Pennsylvania 15237. Our Chief Compliance Officer (CCO) is responsible for the maintenance of these books and records.

Our firm maintains the following document types and forms that are not transmitted to NFS:

- New account forms
- Client Correspondence

We currently use multiple methods for electronic document retention:

Several document types are retained on network cloud servers. These documents are scanned or electronically saved into our system, and daily backups are maintained offsite as part of our ordinary business practices. Some other document types are retained in Microsoft Teams.

Along with those documents being maintained on network cloud servers, some files are also stored offsite at Access.

Access Contact Information:

Access
920 Bidwell Street
Pittsburgh, PA 15233
877.345.3546

E-mails are archived using an email archive and compliance solution provided by Intradyn. This process archives both incoming and outgoing emails for all user mailboxes on Microsoft Office 365 Exchange Online. Backup copies of all user mailboxes are performed using Skykick Cloud Backup for Office 365.

Intradyn's Contact Information:

Intradyn
1355 Mendota Heights Road, Suite 300
Mendota Heights, MN 55120
651-203-4600

Our firm maintains its backup of network files (client files, user files, and scanned documents) with Veeam Backup.

In the event of an internal or external SBD that causes the loss of our records, we will recover them from our back-up resources. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location.

Rule: FINRA Rule 4370 (c)(1).

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, the Emergency Contact Persons or their designee(s) will identify what means will permit us to communicate with our customers, employees, critical business constituents, banks, critical counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we may employ will include our website, telephone voice mail, secure-mail and personal contact. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

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, the Chief Financial Officer (CFO) 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. The Emergency Contact Persons will contact our clearing firm, banks, and shareholders to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counterparties or otherwise continue to fund our operations, the CFO with authority from the Board of Directors 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.

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

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:

Custodian/Clearing Provider:
FBSI or Wealthscape (NFS Proprietary Systems)
1000 Plaza 5
Jersey City, NJ 07311
800.801.9942

Business Continuity Plan (BCP)

Telephone Provider:
Vonage
P.O. Box 23887
New York, NY 23887

Internet Provider:
Verizon FIOS
P.O. Box 15124
Albany, NY 12212-5124

In case of a business disruption, we have arranged with Comcast Business Class to have a prerecorded message on all outgoing phone numbers. The IT Director or his designee may arrange for this service from any telephone.

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. NFS 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.

NFS's contract states that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. NFS represents that they will advise us of any material changes to their plan that might affect our ability to maintain our business and presented us with an executive summary of their plans, which is available at this link: [National Financial Services LLC Business Continuity Statement Fact Sheet \(mybrokerageinfo.com\)](http://mybrokerageinfo.com). In the event NFS executes their plan, they represent that they will notify us of such execution and provide us equal access to services as their other customers. If we reasonably determine that NFS has not or cannot put their plan in place quickly enough to meet our needs or are otherwise unable to provide access to such services, NFS represents that they will assist us in seeking services from an alternative source.

NFS represents that it backs up our records at a remote site. NFS 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. NFS 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, 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. NFS's Notice of Business Continuity is attached.

A. Our Firm's Mission Critical Functions

1. **Order Taking**

Our firm receives orders from customers via telephone/fax/e-mail/ Streetscape.com and 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 notifications on our telephone system and on our website. If necessary, we may advise our customers to place orders directly with NFS, the funds, and companies.

2. Order Entry

Our firm enters orders by recording them on paper and/or 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, which include telephone, electronic transmission, courier service, and United States mail. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver the order to NFS by the fastest means available when they resume operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with NFS for order entry.

3. Order Execution

We execute orders by telephone and electronic transmission. In the event of an internal SBD, we would move to our alternate location and continue to transmit orders in the same manner. In the event of an external SBD, we would move critical personnel to our alternate location and continue to transmit orders in the same manner.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on NFS to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

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

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

A. Customers

We communicate with our customers using the telephone, e-mail, our website, fax, U.S. mail, and in person visits at our firm or at the client's 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.

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

B. Employees

We communicate with our employees using electronic or telephonic means. 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. The Emergency Contact Persons may employ an electronic or telephonic communication system so that senior management can reach all employees quickly during an SBD.

Rule: FINRA Rule 4370 (c)(5)

C. Regulators

Allegheny is federally regulated as a Registered Investment Advisor by the Securities Exchange Commission "SEC". We are also members of the Financial Industry Regulatory Association ("FINRA"), the Securities Investor Protection Corporation ("SIPC") and the Municipal Securities Regulatory Board ("MSRB"). We communicate with our regulators using the telephone, e-mail, 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)

XI. Critical Business Constituents, Banks, and Counterparties

A. Business constituents

We will contact 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) to determine the extent to which we can continue our business relationship with them in light of an internal or external SBD. The CCO or his designee may establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or our firm.

Rules: FINRA Rule 4370 (c)(7)

B. Banks

We will contact our banks and lenders to determine if they can continue to provide the financing that we will need in light of an internal or external SBD. The bank maintaining our operating account is:

First National Bank
100 Federal ST, 3rd Floor
Pittsburgh, PA 15212
412.359.2665

The bank maintaining our Proprietary Account of Introducing Brokers/Dealers (PAIB account) is:

Citizens Bank
132 Ben Avon Heights RD, 15B-0906
Pittsburgh, PA 15237
412.367.4232

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

Rules: FINRA Rule 4370 (c)(7)

C. Counterparties

We will contact 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 an 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.

Rules: FINRA Rule 4370 (c)(7)

XII. Regulatory Reporting

Our firm is subject to regulation by the Securities and Exchange Commission, Financial Industry Regulatory Authority, the Municipal Securities Regulatory Board, and the state regulators of the states in which we are registered. We file reports with our regulators using paper copies in the U.S. mail, and/or electronically using fax, e-mail, and the internet websites the regulatory authorities have established (CRD/IARD). 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. If we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

Rule: FINRA Rule 4370 (c)(8)

XIII. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at account opening and in an annual mailing. We also post the disclosure statement on our website and mail it to customers upon request. Our disclosure statement is attached.

Rule: FINRA Rule 4370 (e)

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


Rule: FINRA Rule 4370 (b)

Business Continuity Plan (BCP)

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.

Rule: *FINRA Rule 4370 (d)*

Signed: 
Co-Managing Partner

Signed: 
Chief Compliance Officer

Allegheny Investments, LTD
Allegheny Financial Group, LTD

Date: Revised: January 1, 2024
Previous revisions: (03/20/20, 01/28/15, 12/15/05, 05/10/06, 07/09/07, 01/17/08, 05/01/08, 09/28/12, 05/30/13, 12/09/14, 03/09/16)

Exhibit 1 – Branch Offices

CRD Branch Number	Address	Telephone	Rep Name/Person in Charge
288455	1544 Mileground RD Morgantown, WV 26505	304-292-9469	Jim Alexander
670709	1346 Silver LN Suite 102 Coraopolis, PA 15108	412-829-1745	Bryan Hoover Joseph Hoover
289633	24 Beaver Grade RD McKees Rocks, PA 15136	412-788-1335	Thomas Pandolph Jason Bendik
140253	229 Butler RD Kittanning, PA 16201	724-548-8638	David Rearick
290475	935 Beaver Grade RD Coraopolis, PA 15108	412-264-3600	Robert Spicher Britt Campbell