

STARSHAK WINZENBURG & CO.
Business Continuity Plan Disclosure Statement

Our business continuity plan outlines the policies and procedures we will use to address contingencies that materially affect our ability to conduct our business and continue to serve our clients and customers.

I. Emergency Contact Persons

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II. Firm Policy

Our policy is to respond to a Significant Business Disruption (an “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 and clients prompt access to their funds and securities.

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.

III. Data Back-Up and Recovery (Hard Copy and Electronic)

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up 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.

IV. Operational and Financial Assessments

Operational risk includes our ability to maintain communications with customers and clients and to retrieve key activity records through our mission critical systems. In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, banks, critical counter-parties, and regulators.

Financial risk involves our ability to fund operations and maintain adequate financing and sufficient capital. We also may face credit risk (where our investments may erode from the lack of liquidity in the broader market), which would also hinder the ability of our counter-parties to fulfill their obligations. 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.

V. Alternate Communications Between Clients, Employees Regulators and Us

We now communicate with our customers and clients, employees and contractors, and regulators using the telephone, e-mail, our Web site, fax, U.S. mail, overnight delivery services, and in-person visits in our office 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 most expedient means to communicate with the other party.

VI. Critical Business Constituents and Banks

We believe 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) will continue our business relationship with them, and our banks will continue to provide the financing we need, in light of an internal or external SBD. We will quickly establish alternative arrangements if a business constituent or bank can no longer provide the necessary goods or services when we need them because of an SBD to them or to us.

VII. Regulatory Reporting

We are subject to regulation by: the Securities and Exchange Commission (the “SEC”), the Securities Investor Protection Corporation (“SIPC”), the Financial Industry Regulatory Authority (“FINRA”), the Municipal Securities Rulemaking Board (the “MSRB”) and the Illinois Securities Department. We now file reports with our regulators using paper copies in the U.S. mail and overnight delivery service and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC, NASD, and other regulators to determine which means of filing are still available to us and use the most expedient means. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

VIII. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location. In addition, we will review the BCP annually to modify it for any changes in our operations, structure, business, or location.