

Business Continuity Plan (BCP)

January 1, 2020

I. Emergency Contact Persons

Our firm's emergency contact persons are:

- Harold Schwartz, 303-470-5664, hal.schwartz@dmkadvisorgroup.com
- Nicole Slack, 303-996-5671, nicole.slack@dmkadvisorgroup.com
- Stephen Kohn, 303-996-5680, stephen.kohn@dmkadvisorgroup.com

These names will be updated in the event of a material change.

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 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)

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, especially on the capabilities of our clearing firm.

B. Approval and Execution Authority

Stephen Kohn, President, a registered principal, is responsible for approving the plan and for conducting the required annual review. Stephen Kohn has the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP plan, the annual reviews and the changes that have been made to it for inspection. An electronic copy of our plan is located at www.dmkadvisorgroup.com as well as the Firm's iCloud backup provider.

Rule: FINRA Rule 4370(b), (d) and (e).

III. Business Description

Our firm conducts business in equity, fixed income, and derivative securities. 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 sent to our clearing firm, which [executes our orders,] compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only retail customers.

Our clearing firm is Fidelity Custody & Clearing Solutions, 200 Seaport Boulevard, Boston, MA 02210, 800-752-7053, www.nationalfinancial.com, and our contact person at our clearing firm is Craig Donnelly, (617) 563-7327, craig.donnelly@fmr.com. Our clearing firm has also given us the following alternative contact in the event Mr. Donnelly cannot be reached: Laura Lynn Morrissey, (617) 392-0327, lauralynn.morrissey@fmr.com.

IV. Office Locations

A. Office Location

The location of our corporate office is located at 7114 W. Jefferson Ave., Ste. 305, Lakewood, CO 80235. Its main telephone number is (303) 984-2558. Our employees may travel to that office by means of foot, car, bus or bicycle. We engage in order taking and entry at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected offices to Ballantrae Professional Office Park, 17961 Hunting Bow Circle, Suite 102, Lutz, FL 33558-5374. Its main telephone number is (813) 996-6100. Our employees may travel to that office by means of foot, car, bus or bicycle. In the event of a Significant Business Disruption we will engage in order taking and entry at this location.

Rule: FINRA Rule 4370(c)(6).

VI. Customers' Access to Funds and Securities

Customer funds and/or securities are held at our clearing firm, Fidelity Custody & Clearing Solutions. 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 our clearing firm on their behalf, and if our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting Stephen Kohn, (303) 996-5680, stephen.kohn@dmkadvisorgroup.com. The firm will make this information available to customers through its Website.

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

Our firm maintains its books and records at 7114 W. Jefferson Ave., Ste. 305, Lakewood, CO 80235. Stephen Kohn, President, (303) 996-5680, is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm: new account applications for non-qualified accounts, one-time IRA withdrawal forms, portion of customer margin agreements, management agreements and

ACAT forms. Electronic records are scanned and incrementally backed up by Carbonite, Inc. All records are readily accessible by executive personnel through “cloud” access to Carbonite, Inc.

Our firm maintains back-up copies of its books and records electronically on Firm owned computers (“Computers”). These computers are continually, incrementally backed up by Carbonite, Inc. Stephen Kohn, 303-996-5680 is responsible for the maintenance of back-up books and records. Paper records are scanned to Computers and taken to our back-up site. The firm backs up its electronic records weekly with standard computer backup procedures and keeps a copy at Ballantrae Professional Office Park, 17961 Hunting Bow Circle, Suite 102, Lutz, FL 33558-5374

In the event of an internal or external SBD that causes the loss of our paper records, we will recover them from our scanned document files as necessary. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of paper records, we will electronically recover data from Carbonite, Inc., or, if our primary site is inoperable, 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, 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 Website www.dmkadvisorgroup.com, telephone and voice mail, (303) 470-5664, and email, stephen.kohn@dmkadvisorgroup.com. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

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, 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 net-capital compliance. We will contact our clearing firm, critical banks and/or 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, including ceasing operation as a Broker/Dealer, turning all control of customer accounts to our clearing agent for service.

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.

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. 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 and have made a copy of that plan available to us. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us with 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, out of region site. 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 and it has confirmed that it tests its back-up arrangements at least twice a year.

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. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of less than one hour and resumption time of less than one day.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives customer orders from our Representatives via telephone and/or email. 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 email. If necessary, we will advise our customers to place orders directly with our clearing firm at 617-563-5977.

2. Order Entry

Currently, our firm enters orders by recording them on paper, time stamping the paper trade tickets and forwarding the trade to our clearing firm electronically. We place customer orders electronically through Wealthscape, as a rule. We have reviewed the Fidelity Custody & Clearing Solutions Business Continuity Plan. Under its BCP, we can expect key functions to be operational within one hour in an SBD.

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, FAX and email. 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. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

3. Order Execution

We currently enter orders for execution by forwarding them to our clearing agent either telephonically, by FAX, email or by entering them in the Wealthscape system. In the event of an internal SBD, we would forward orders to our clearing agent by the fastest means possible once communication was re-established. In the event of an external SBD, we would forward orders to our clearing agent by the fastest means possible once communication was re-established.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm 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) & (f)(1).*

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 at the other'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. 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.

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

B. Employees

We now communicate with our employees using the telephone, e-mail, U.S. Priority 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 a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: Stephen Kohn.

Caller	Call Recipients
Stephen Kohn	Nicole Slack, Michael Toner, Greenwood Village Office, Seattle, WA Office, Andrew Krongold, John Ohman, Joseph Stapleton, Peter Wyrrough, Troy Cook, Pierre Kisteneff
Nicole Slack	Richard Lalor, Gail Diane, Stephen Westveer, Robert Hammel, Craig Hubler, Maria Salmon Michael Romero, John Ohman
Hal Schwartz	Jorge Perez, William Norton, Kelvin Douglas, Michael Weist, Janak Desai, Sunil Misra, John Morrill, Alberto Pedrosa-Menabrito, Ruben Rodriguez-Dominguez, Michael Blackmore, Devika Kamboh

C. Regulators

We are currently a member of the following SROs: FINRA and 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 Counter-Parties

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. 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 an SBD to them or our firm.

Rules: FINRA Rule 4370(c)(7).

B. Banks

We have contacted our banks and lenders to determine if they can provide the financing that we will need in light of an internal or external SBD. The bank maintaining our operating account is: Bank of Colorado, 275 Union Boulevard, Lakewood, CO 80228, Cleo Ariano, Branch President. If our bank and other lenders are unable to provide the financing, we will seek alternative financing immediately from private sources.

Rules: FINRA Rule 4370(c)(7).

C. Counter-Parties

We are establishing critical counter-parties, such as other broker-dealers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties 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: FINRA, MSRB, various states and the SEC. 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, MSRB 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. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us. Regulator contact information is as follows: FINRA (303) 446-3100, MSRB (703) 797-6600 and the SEC (202) 942-8088.

Rule: FINRA Rule 3510(c)(8).

XIII. Disclosure of Business Continuity Plan.

We provide notice of our BCP to customers monthly by including disclosure of same on account statements provided by our Clearing Agent. We post the disclosure statement on our Web site and mail it to customers upon request. Our disclosure statement is attached. Customers are informed to review Firm's Website for BCP disclosure statement.

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 the BCP to certify and test pursuant to FINRA Rules.

Rule: FINRA Rule 4370(b).

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).



Title: President

Date: January 1, 2020

Attachment A to DMK Advisor Group, Inc. Business Continuity Plan

Fidelity Custody & Clearing Services

January 1, 2020

Fidelity Custody & Clearing Services (FCCS) is a broker-dealer and member of the NYSE and FINRA and acts as the clearing firm for DMK Advisor Group, Inc (DMK), your Broker/Dealer. Your assets are held at FCCS.

NYSE Rule 446 and FINRA Rule 3510 require each member firm to create and maintain a business continuity plan. In accordance with these rules FCCS has developed a plan to ensure that business continues to run uninterrupted during business emergencies. DMK, based on its relationship with FCCS relies on the FCCS Business Continuity Plan to ensure that your account is safely maintained in the event of most any form of business disruption.

The plan is designed to address key areas of concern including but not limited to the following:

- Books and records recovery;
- All mission critical systems;
- Financial and operational assessments;
- Alternate means of communication between FCCS and its customers;
- Alternate means of communication between FCCS and its employees;
- Alternate physical locations of employees;
- Critical business constituent, bank and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How FCCS will ensure that customers have access to their funds and securities in the event FCCS determines it is unable to continue its business.

Events creating a disruption of business may vary in nature. They could affect only FCCS, affect the building where FCCS is located, affect the entire business district where FCCS is located, result in a citywide disruption or result in a regional disruption. FCCS fully intends to continue to conduct a securities business during these periods of business disruption ranging from disruptions that only affect FCCS to disruptions that have regional impact.

To address disruptions affecting only FCCS, the building where FCCS is located or the business district where FCCS conducts business, FCCS has arranged with an outside organization to supply a physical location as well as key technology infrastructure in an area that does not share any power grids with the current location and will afford FCCS the opportunity to relocate its key employees and critical information technology systems in order to provide services for its clients.

To address citywide and regional business disruptions, FCCS has contracted with a vendor to supply FCCS alternate office space and key information technologies in cities and regions that differ from FCCS's locations. FCCS intends to take advantage of this and also use the facilities of affiliates that may be located in other cities or regions of the country.

Please be advised that business continuity plans are subject to change and modification. FCCS intends to update and test its business continuity plans as business conditions and technology change.

Should you have any questions concerning the business continuity plan please submit a written request for additional information to your broker.

Business Continuity Planning

DMK Advisor Group, Inc. has developed a Business 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 continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (303) 470-5664 or stephen.kohn@dmkadvisorgroup.com or you should call our alternative number (813) 996-6100 or click her to [go to our website](#). If you cannot access us through either of those means, you should contact our clearing firm, Fidelity Custody & Clearing Solutions (“FCCS”) at 800-752-7053 or www.nationalfinancial.fidelity.com for instructions on how it may assist you with executing a trade, providing account information and other services.

Our Business 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 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 counterparty impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, NFS backs 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, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 24 hours. 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 in less than an hour. 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 approximately 48 hours. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you [through our website](#) or our customer emergency number, (813) 996-6100 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 us at (303-996-5680).