



TREE CITY ADVISORS

Business Continuity Plan (BCP)

Updated 03-2-2019

Tree City Advisory'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.

Emergency Contact Persons

Tree City Advisors' two emergency contact persons are:

Brian Wiley, President

208-888-1244

Brian@TreeCityAdvisors.com

OR

Jeremiah Bates, CCO & IAR

208-888-1244

Jeremiah@TreeCityAdvisors.com

In the event of a Significant Business Disruption (SBD) Tree City Advisors will provide FINRA with the contact information for the two emergency contact persons: (1) name; (2) title; (3) mailing address; (4) email address; (5) telephone number; and (6) facsimile number through the FINRA Contact System (FCS). Brian Wiley will promptly notify FINRA of any change in this information through FCS (but no later than 30 days following the change) and will review, and if necessary update, this information within 17 business days after the end of each calendar year.

Contacting Us

If after a significant business disruption you cannot contact us as you usually do at 208-888-1244 or via email at Jeremiah@TreeCityAdvisors.com, you should call our alternative number 208-891-8502 or go to our website at www.TreeCityAdvisors.com. If you cannot access us through either of those means, you should contact our custodian, TD Ameritrade at independence@tdameritrade.com or **800-431-3500** to locate information on access to funds and securities, enter orders, and process other trade-related cash and security transactions.

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.

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.

Approval and Execution Authority

The President & Chief Compliance Officer of the firm is responsible for approving the plan and for conducting periodic review. The President & Chief Compliance Officer has the authority to execute this BCP.

Plan Location and Access

Tree City Advisors will maintain copy of its BCP plan in the firm's reception area. Every Advisor will also maintain a copy of the BCP off site. An electronic copy of our plan is located on our website at treecityadvisors.com/business_continuity_plan.

Business Description

Tree City Advisors (TCA) is a Registered Investment Advisor regulated by the Idaho Department of Finance. TCA manages assets for its clients through continuous supervisory services.

Our custodian for RIA accounts is TD Ameritrade Institutional:



Contact Information for TD Ameritrade:

Phone: 1-800-431-3500, Option #2

Fax: 866-226-4617

E-mail: independence@tdameritrade.com

Regular Mail: TD Ameritrade Institutional
PO Box 650567
Dallas, TX 75265-0576

Overnight Mail: TD Ameritrade Institutional
7801 Mesquite Bend Drive, Suite 112
Irving, TX 75063-6043

Office Locations

Tree City Advisors' office is located at **1673 West Shoreline Dr. Suite 140, Boise, ID 83702**. Its main office number is **208-888-1244**.

Alternative Physical Location(s) of Employees

In the event of an SBD, within 72 hours we will move our staff from affected office to the nearest available **Regus** location at either:

- **Downtown Boise: 950 W Bannock (11th Floor), Boise ID 83702** or
- **The Village at Meridian: 3597 E Monarch Sky Lane, Meridian ID 83646**.

The main telephone number for the Regus Downtown location is **208-319-3500**. Our business phone service will be forwarded first Jeremiah Bates, second to Brian Wiley.

Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our custodian, TD Ameritrade, for RIA accounts. 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 custodian on their behalf, and if our internet access is available, our firm will post, on our website at

treecityadvisors.com that RIA customers may access their funds and securities by contacting TD Ameritrade. The firm will make this information available to customers through its disclosure policy.

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

Our firm conducts business primary as a paperless organization. Our firm primarily maintains its business financial books and records electronically via a cloud based technology. If any hard copies exist at all, such as books to evidence incorporation of firm, stationary, and/or marketing materials, these hard copies are maintained and stored at our office located at 1673 West Shoreline Dr. Suite 140, Boise, ID. Jeremiah Bates, Chief Compliance Officer, is responsible for the maintenance of these books and records. All other corporate related documents and records are stored via a cloud based service provided by Dropbox.com, a 3rd party vendor that has several layers of backup.

Our firm does not maintain hard copies of client related materials, data, notes, record, or files. Rather, our firm stores and maintains all client related records offsite electronically. Electronic records are maintained using an internet based storage system provided by Redtail Technology (Redtail CRM), a 3rd party vendor that has several layers of backup. Retail Technology's home office is in Gold River, CA and can be reached at (800) 206-5030.

Copies of client files are also maintained at our custodian, TD Ameritrade, for RIA accounts.

Electronic files are kept on the Redtail CRM software (the Cloud). Redtail has several layers of backup. All business email data and records are stored by Smarsh.com, a 3rd party vendor that has several layers of backup.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from Redtail. If our primary site is inoperable, we will continue operations from Redtail, TD Ameritrade, Smarsh, Advyzo and Dropbox at our alternate physical business location referenced in this document. For the loss of electronic records, we will electronically recover data from our 3rd party vendors listed above.

Financial and Operational Assessments

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, telephone voice mail, secure email, etc. In addition, we will retrieve our key activity records as described in the section above.

Financial and Credit Risk

Tree City Advisors does not maintain any investments in the name of our firm. All investments are maintained at TD Ameritrade as our custodian for RIA accounts.

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. These systems are maintained by TD Ameritrade as our custodian for RIA accounts.

We have primary responsibility for establishing and maintaining our business relationships with our clients and have responsibility for our mission critical functions of order taking. Our custodian provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Our custodian contract for RIA accounts provides that our custodian will maintain a business continuity plan and the capacity to execute that plan. Our custodian represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event our custodian executes its plan, it represents that it will notify us of such execution and provide us equal access to services. If we reasonably determine that our custodian 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 custodian represents that it will assist us in seeking services from an alternative source.

Our custodian represents that it backs up our records at a remote site. Our custodian 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 custodian 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 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 custodian's SBD recovery time and resumption time periods are dependent upon the nature and scope of the SBD.

The President & Chief Compliance Officer will periodically review our custodian's capabilities to perform the mission critical functions the custodian has contracted to perform for our firm.

Our Firm's Mission Critical Systems

Order Taking

Currently, our firm receives orders from customers via telephone, email, or in person. 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 any available method. If necessary, we will advise our RIA customers to place orders directly with our custodian.

Order Entry

Currently, our firm enters orders electronically and sending them to TD Ameritrade as our custodian for RIA business electronically or telephonically.

In the event of an internal SBD, we will enter and send records to our custodian by the fastest alternative means available. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the custodian 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 custodian for order entry.

Order Execution

Tree City Advisors does not execute customer orders. Execution of orders is performed by TD Ameritrade as our custodian for RIA accounts.

Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our custodian to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of RIA funds and securities.

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

Customers

We now communicate with our customers using the telephone, email, our website, U.S. mail and in-person visits at our firm. 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 email but the Internet is unavailable, we may call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

Employees

We now communicate with our employees using the telephone, email, 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.

The main phone line 208-888-1244 **will be transferred within 24 hours to first Jeremiah Bates, and second to Brian Wiley.**

Regulators

We are currently regulated by the Idaho Department of Finance. Contact information for the regulator follows:

Idaho Department of Finance
800 Park Blvd., Suite 200
Boise, ID 83712
P.O. Box 83720
Boise, ID 83720-0031
Phone: (208)332-8000
Toll-Free (Within Idaho Only): 1-888-346-3378
E-Mail: finance@finance.idaho.gov

We communicate with our regulators using telephone, email, U.S. mail, in person, etc. 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 now file reports with our regulator using paper copies in the U.S. mail, and electronically using fax, email and the Internet. In the event of an SBD, we will check with the Idaho Office of Securities 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.

Critical Business Constituents, Banks, and Counter-Parties

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), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD.

Counter-Parties

We will contact our critical counter-parties 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.

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 as soon as possible. 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 counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

TD Ameritrade, our custodian for RIA accounts, 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 custodian that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments as soon as possible, dependent upon the nature and scope of the SBD. 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 as soon as possible, dependent upon the nature and scope of the SBD.

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 as soon as possible, dependent upon the nature and scope of the SBD. In either situation, we plan to continue in business, transfer operations to our custodian if

necessary, and notify you through our website, www.TreeCityAdvisors.com or our customer service number, 208-888-1244.

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 us at **208-888-1244** or via email at **Jeremiah@TreeCityAdvisors.com**.