

American Heritage Securities, Inc.

Business Continuity Plan (BCP)

I. Emergency Contact Persons

Our firm's two emergency contact persons are: Edgar G Ingraham, President, 330-535-0882, ahs@egifinancial.com and Michael Prescott, 330-535-0881, mprescott@egifincaial.com Registered representative. These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days of the end of each quarter.

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

Edgar G. Ingraham, President, a registered principal, is responsible for approving the plan and for conducting the required annual review. Edgar G. Ingraham, President, has 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. We have given the Chicago FINRA office a copy of our plan. Two electronic copies of our plan are located on disk (CD) in the folder named AHS BCP. These disks are stored at 655 W Market Street, Akron, Oh 44303 (company office) and at 1191 W Sunsetview Dr, Akron, OH 44313 (residence of principal).

III. Business Description

Our firm conducts business in equity, fixed income, and mutual fund 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 deliver funds and securities. Our firm services only retail customers. We do not engage in any private placements.

Our clearing firm is First Clearing, LLC, 901 E. Byrd St. Richmond, VA 23219, 800-727-0304 x2397, www.firstclearing.com, and our contact person at that clearing firm is Michael Santana 804-868-3079, michael.santana@firstclearing.com or, alternative Steve Beck, 804-782-4168, sbeck@firstclearing.com. Additionally, for the alternative contact information, see Attachment B for a letter from our clearing firm provided detailing their Business Continuity Planning.

IV. Office Locations

Our Firm has two offices: the main office is located at 655 W Market Street, Akron, Ohio 44303, phone 330-535-0881. A branch office is located at 928 Portage Trail Cuyahoga Falls, Ohio 44221, phone 330-940-3377. We engage in order taking and entry at both locations.

V. Alternative Physical Location(s) of Employees

In the event of an SBD at either location the BCP is to move staff and operations to the alternative office, if possible, otherwise, we will move our staff from affected offices to 1191 W Sunsetview Dr, Akron, Ohio, phone 330-869-9658.

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, First Clearing LLC. 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. If our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting First Clearing, LLC, One North Jefferson Ave, St Louis, MO 63103. Order requests (sales only accepted) are to be directed to 877-488-3748. For other requests to our clearing firm, such as check requests call: 877-496-3223. The firm will make this information available to customers through its disclosure policy.

Our brokers are to contact First Clearing at 877-496-3221 if normal lines of communication are unavailable.

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.

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

Our firm copies all account and signature forms, letters of authorization and transfer forms. The originals are sent to our clearing firm, First Clearing, LLC, One North Jefferson Ave, St Louis, MO 63103. Our firm maintains copies of these books and records as well as its electronic records at 655 W Market Street,

Akron, Ohio 44303. Edgar G Ingraham, President, phone 330-535-0881, is responsible for the maintenance of these books and records.

Our firm also maintains electronic records of client accounts in a portfolio management program and we maintain corporate financial records on a financial software program. The firm backs up these electronic records monthly by copy to disk and keeps a copy at 1191 W Sunsetview Dr, Akron, Ohio.

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

VIII. 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 telephone, telephone voice mail. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

A. 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 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.

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 the systems of our clearing firm, FCC, who provides 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 represents that it will advise us of any material changes to its business continuity plan that might affect our ability to maintain our business. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us 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 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.

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. In relation to recovery times for our clearing firm, see Attachment B for a letter from our clearing firm detailing their Business Continuity Planning.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from customers via telephone or 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 telephone or US mail. If necessary, we will advise our customers to place orders directly with our clearing firm at First Clearing, LLC, One North Jefferson Ave, St Louis, MO 63103.

2. Order Entry

Currently, our firm enters orders by sending them to our clearing firm electronically.

In the event of an internal SBD, we will enter orders by recording them on paper and send them to our clearing firm by the fastest alternative means available, which include telephone fax, or email. Our clearing firm has established an emergency contact phone line for us: 877-496-3221. 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. Customers would contact the clearing firm at 877-436-3223.

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.

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

A. Customers

We now communicate with our customers using the telephone, fax, email, 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.

B. Employees

We now communicate with our employees using the telephone 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: Edgar G Ingraham, President,

Caller	Call Recipients
Edgar G Ingraham	Michael Prescott, Joy Yoho, Lewis Seikel, Brian Weinreich
Michael Prescott	Phil Ciarrochi, Karen Ingraham, Steve Wagner, James Wynne

C. Regulators

We are currently members of the following SROs: FINRA, MRSB. 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.

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 a SBD to them or our firm. Our major suppliers are: Ralph Lux, CPA, Lux & Associates CPA, Inc., 867 Moe Drive, Akron, OH 44310, phone 330-633-5259.

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. One bank maintains our operating accounts: National City Bank (NCB) 153 E Exchange St, Akron OH. 44304, phone 330-375-8377, contact Jack Bird. The bank maintaining our Proprietary Account of Introducing Brokers/Dealers (PAIB account) is First Clearing, LLC, One North Jefferson Ave, St Louis, MO 63103, contact: Steve Beck 1-800-727-0304 x2397.

C. Counter-Parties

We have contacted our critical counter-parties, 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 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.

XII. Regulatory Reporting

Our firm is subject to regulation by: FINRA, SEC, MSRB, and the State of Ohio. 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, 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. FINRA contact: Greg Farrell, ph 312-899-4681. State of Ohio contact: David Melito, ph 614-644-7467.

XIII. Disclosure of Business Continuity Plan

We disclose in writing a summary of our BCP to customers at account opening and annually. We also mail it to customers upon request. Our summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope. In addressing the events of varying scope, our summary provides a scenario of disruption to our business facilities and states we plan to continue business during that scenario within one business day. It provides general information on our intended response and discloses the existence of back-up facilities and arrangements. Our summary disclosure is included in Attachment A.

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.

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.

Signed:

Print Name: Edgar G Ingraham

Title: President

Date: 11/13/2009

Attachment A:

Following is a summary of our Business Continuity Plan (BCP) to be enacted in the event of a significant business disruption (SBD):

American Heritage Securities, Inc. Business Continuity Plan (BCP)

American Heritage Securities has two locations:

Main Office: **655 W Market Street, Akron OH, 44303, phone 330-535-0881**

Branch: **928 Portage Trail, Cuyahoga Falls, OH, 44221, phone 330-940-3377**

The firm's email address is; ahs@egifinancial.com

In the event of a disruption that affects our firm's ability to communicate and do business, clients are advised to contact our clearing firm directly at First Clearing, LLC, One North Jefferson Ave, St Louis, MO 63103. Order requests (sales only accepted) are to be directed to 877-488-3748. For other requests to our clearing firm, such as check requests call: 877-496-9889.

Our firm has established back-up facilities and arrangements to deal with SBD's and will make very effort to contact customers should a SBD occur. Our firm expects to be able to resume business activity after a SBD within one business day.

Attachment B:

-----■-----

FCCS Correspondent Firm Business Continuation Support Initiative

June, 2009

First *Clearing*
CORRESPONDENT SERVICES

For First Clearing Correspondent Firms Use, Only

Version 1.01

July 14, 2009

Copyright © 2009 by First Clearing Correspondent Services, a subsidiary of Wells Fargo Advisors Incorporated. All rights reserved. For information, contact First Clearing Correspondent Services. This document contains proprietary information of the First Clearing Correspondent Services and may not be divulged without prior written authorization.

DISCLAIMER

Any and all information provided by First Clearing Correspondent Services contained within this document (collectively the "Information") has been prepared solely for informational purposes and for use only by employees (and not clients) of introducing firms. No guaranty, representation or warranty is being given by First Clearing Correspondent Services with respect to the accuracy, reliability or completeness of the Information and First Clearing Correspondent Services and its affiliates disclaim any and all liability relating to the Information. The Information may contain discussions of certain compliance, legal, tax, regulatory, and/or accounting issues. Any such discussions are generic in nature and may not be applicable or complete for any introducing firm's specific circumstances. First Clearing Correspondent Services is not offering compliance, legal, tax, regulatory or accounting advice and the Information should not be relied upon by introducing firms as such. Nothing contained within this document, nor the Information itself, is intended to supersede or affect the rights and responsibilities of each introducing firm and First Clearing Correspondent Services under their respective Clearing Agreement.

Table of Contents

OVERVIEW 1

GENERAL EMERGENCY PROCEDURES 2

FCCS CORRESPONDENT FIRM BUSINESS CONTINUATION SUPPORT INITIATIVE 3

 Registered Rep Calls 3

 End-Client Calls 3

FCCS Telephone Systems 4

 Registered Rep Phone Number 4

 End-Client Phone Number 4

Web-site Language 4

 Language about First Clearing 4

 BCP Language 4

OVERVIEW

Emergency situations can be stressful for your firm, employees, and end-clients. The FCCS Correspondent Firm Business Continuation Support Initiative defines the services FCCS will provide when a correspondent firm declares an emergency and invokes its Business Continuation Plan (BCP).

This guide provides:

- An overview of the FCCS Correspondent Firm Business Continuation Support Initiative
- How the program is initiated
- A telephone number for correspondent firm's registered representatives to call in the event they cannot place orders into their system (when a disaster is declared)
- A telephone number for end-clients to call if the correspondent firm cannot take calls from clients
- Approved language for correspondent firms to use on the website related to business continuity services

The Registered Rep number is 877-496-3221.

The End-Client Call-in number is 877-496-3223.

**GENERAL
EMERGENCY
PROCEDURES**

1. When a Correspondent Firm experiences a significant disruption of business services and normal services will not resume in the near term, the Correspondent Firm will declare an emergency and notify their FCCS Relationship Manager or Segment Director.
2. FCCS will discuss the emergency with the affected firm:
 - Is the office inhabitable?
 - How long before the Correspondent Firm can re-occupy their office? How long before they can take orders?
 - Has the issue destroyed their technology (desktops, networks)? How long before network and other technology platforms are restored?
 - What is the status of their employees?
 - How long before they get to their alternate site? How long before it is operational? Again, how long before they can take orders?
 - Will the firm be using their Small Firm Emergency Partner Program? Has the partner been notified?

NOTE At FCCS, the FCCS President, Chief Risk and Quality Officer, Director of Business Solutions and the Manager of Business Implementation have the authority to implement the Correspondent Firm Disaster Response Program.

3. FCCS will implement our Correspondent Firm Business Continuation Support Initiative

**FCCS
CORRESPONDENT
FIRM BUSINESS
CONTINUATION
SUPPORT
INITIATIVE**

The Initiative was developed to assure a timely response when a Correspondent Firm declares an emergency. The Initiative is not intended to replace the Correspondent Firms' obligations to have their own BCP and recovery plans, as defined by FINRA. The Initiative defines the services we will support so these services will be ready shortly after the emergency is declared.

Correspondent Firms are expected to take orders from their customers shortly after the emergency is declared. The Initiative is based upon the assumption that a firm will be able to take orders and enter them into a system (SmartStation, Wisdom, Beta BackOffice) within 24 hours.

Registered Rep Calls

When the firm's Registered Rep (FA) calls FCCS, FCCS will support all Equity, Option, Mutual Fund and Fixed Income Orders (bid wanted requests, only).

All calls will be routed to the Access Online Help Desk. The Access Online Help Desk will verify the identity of the FA using our Beta Systems. Once verified, the Access Online Help Desk will take and place the order.

For all other services, such as check requests, account questions, etc, the FA will contact FCCS using the existing phone numbers.

End-Client Calls

End-clients can call FCCS only when the affected firm cannot take calls from their clients.

End-client calls will be routed to either the Access Online Help Desk for liquidation orders only, or to an FCCS team for Check Request processing.

The Access Online Help Desk associate will verify the identity of the client using our Beta Systems. Once verified, the Access Online Help Desk will take and place the order. Only Equity, Option and Mutual Fund liquidation orders will be accepted. Option exercises will be processed as long as it doesn't create a debit. End-clients must wait for their firm's services to return to submit a Fixed Income Bid/Sell requests.

Check requests will be routed to an FCCS team that will process the check request. The team will verify the identity of the customer and mail the check to the address of record. ACH/Wires will not be processed.

End clients with questions about their account, activity, opening a new account, account transfers, ACATS, general account questions, etc, must wait for their firm to resume normal operations.

FCCS Telephone Systems

This section describes the telephone systems and procedures to use during a business disruption.

Registered Rep Phone Number

The affected firm's registered reps should use this number to place orders until the affected firm's technology is restored. The Registered Rep will press "1" to be routed to the Access Online Help Desk.

End-Client Phone Number

The affected firm's clients will call this number to place a liquidation order or request a check. The client will press "1" for liquidation orders or press "2" to request a check.

The recording will indicate that the client must wait for normal services to place a purchase order, open or close an account, or for any other service requests.

Web-site Language This section provides FCCS-approved language for our firm's website. Changes to this language or different language about FCCS BCP services must be approved by FCCS.

Language about First Clearing First Clearing Correspondent Services (First Clearing) provides a comprehensive suite of solutions to help independent, unaffiliated retail broker dealers run more efficiently, grow more confidently and protect more effectively. These solutions include trade execution and clearance, securities settlement, record keeping, client confirmations and statements, broker workstation technology, and access to a full range of investment products and services.

BCP Language During a significant business disruption, we (meaning the correspondent firm) will re-establish telephone service with our clients as soon as possible. Our clients should check our website at <web site URL> for our latest information.

As a client of <correspondent firm name> we recognize you may need access to your account to sell a position or request a check before we re-establish telephone service. During this time, First Clearing, our clearing firm, will assist you with sell/liquidation orders and provide check disbursements, if needed. If you cannot contact our firm, please call First Clearing for assistance at 877-496-3223.

