

FORTUNE FINANCIAL SERVICES, INC

BUSINESS CONTINUITY PLAN

The following is the Business Continuity Plan (“BCP”) for Fortune Financial Services, Inc. This plan addresses our firm’s procedures for responding to any significant business disruption.

(1) Emergency Contact Persons

Our firm’s two emergency contact persons are:

- 1-Blake W. Daniels-principal-724-846-2488
blake@fortunefinancialservices.com
- 2-Richard L. Reno-principal-724-846-2488
rreno@fortunefinancialservices.com

These names will be updated in the event of a material change and our executive representative will review them within 10 days of the end of each quarter.

(2) 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 assisting our clients in every facility possible.

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 and/or citywide or regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, specifically the mutual fund companies and insurers with whom we deal.

Blake W. Daniels, CEO, a registered principal, is responsible for approving the plan and for conducting the annual review, and has authority to execute this BCP. Copies of our BCP will be maintained by our firm as well as annual reviews and any amendments or changes. A copy will also be maintained at our offsite alternate address.

(3) Business Description

Our firm conducts business in mutual funds, variable life/annuities, as well as various insurance products. Our firm does not hold customer cash or securities. All sales are processed on a subscription-way basis.

(4) Home Office Location

Our home office is located at:
1010 Third Avenue
New Brighton, PA 15066 (P.O. Box 296).

(5) Alternate Physical Location of Employees

In the event of an SBD we will move our staff from our home office location to:
2919 Conway Wallrose Road
Baden, PA 15005.
Phone – 724-601-5947

This address is outside of the downtown business district and is approximately 14 miles away, off of PA Rt. 65S (Ohio River Blvd.), left onto Conway Wallrose Road.

(6) Alternate Communications Between Customers and Fortune Financial Services

In the event of an SBD we can be reached by customers in the following manners:

- Physically – 2919 Conway Wallrose Road Baden, PA. 15005
- By phone – 724-601-5947
- By email – compliance@fortunefinancialservices.com.

(7) Alternate Communications Between Employees and Fortune Financial Services

In the event of an SBD we can be reached by the firm’s employees in the following manners:

- Physically – 2919 Conway Wallrose Road Baden, PA. 15005
- By phone – 724-601-5947
- By email – compliance@fortunefinancialservices.com.

(8) Critical Business Constituent, Bank, and Counter-Party Impact

In the event of an SBD Fortune Financial will notify in writing within 72 hours all critical business constituents, banks, and counter-parties of our alternate contact information, including alternate physical location and phone number.

(9) Customers’ Access to Funds

Our firm does not maintain physical custody of any customer accounts or funds. All customers can contact their mutual fund and/or annuity company/insurer directly in the event of a business disruption at Fortune Financial Services. Toll-free phone numbers are listed on statements.

(10) Data Backup and Recovery

Our firm maintains its primary hardcopy of books and records at our main office location. All books and records which cannot be obtained from the mutual fund/annuity company/insurer are duplicated and stored offsite at our alternate location. In the event of an SBD that causes the loss of our records, we will physically recover them from our alternate location and continue business as usual. Blake W. Daniels is responsible for retrieving data as required.

(11) Financial and Operational Assessments

In the event of an SBD, we will immediately identify which means will permit us to communicate with our customers, employees, critical business contacts and regulators most effectively. Although the effects of an SBD will determine the means of alternative communication, the communication options we will employ include private and federal mail carrier services as well as telecommunication service providers. In addition, we will retrieve our key-activity records as described above. Our firm carries no liabilities that would affect our financial status because of an SBD.

(12) Mission Critical Systems

Our firm's mission-critical systems are represented by telecommunications providers and private and federal mail carrier services. In the event of an SBD at our home office location all phone and mail functions will be routed to our alternate address. If, because of circumstances, both our home office and alternate location are unusable, we will consider this an apocalyptic event. The phone company and mail carrier services will be notified within 24 hours if a non-apocalyptic SBD has occurred so as to start using our alternative facility and phone services. All employees will also be notified within 24 hours.

(13) Regulatory Reporting

Our firm is subject to both federal and state regulation. We currently file reports in both hardcopy and on the Internet. In the event of an SBD we will check with our various regulatory authorities to determine which means of filing are available to us. Once notified, we will file reports accordingly.

(14) Apocalyptic Events

If an SBD of such magnitude occurs as to render both our home office and alternate location unusable we will consider this an apocalyptic event. All office staff currently lives within a local radius of the home office. Upon occurrence of an apocalyptic event you are to assume Fortune Financial Services has ceased to function as a business. All inquiries should be directed to the Department of Homeland Security or other state, local or federal agency (National Guard, US Army, etc.) that may be in control at that time.

(15) Pandemic

A pandemic is a sustained public health emergency that may have profound consequences on the operation of our business, the economy, including the financial markets. Communications are imperative to keep the business functioning; we will monitor the pandemic situation and will identify which means will permit us to communicate with our customers, employees and critical business contacts most effectively. In the event of a pandemic, critical business functions have been identified, and employees cross trained in anticipation of a reduced work force. Also with the use of telecommunications, employees may work from home. If necessary, critical personnel will be relocated to alternate site.

(16) Disclosure

We will make a copy of our BCP available to regulators or customers upon:

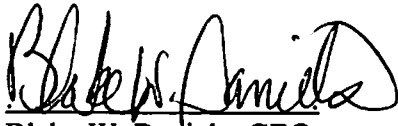
- Written request – “Attn: Compliance,” 1010 Third Avenue, New Brighton, Pa 15066
- Email request – compliance@fortunefinancialservices.com
- Telephone request – 724-846-2488 x13.

Our BCP can also be found on the firm’s website at <http://www.fortunefinancialservices.com/agent-forms/bcp.pdf>.

A written summary shall be provided by the representative at the time of account opening and shall be so noted on the firm’s NAF.

(17) Senior Management Approval

I have approved this Business Continuity Plan as reasonably designed to adequately respond to any significant business disruptions the firm may encounter.


Blake W. Daniels, CEO

01-15-2010
Date