



525 Tyler Rd. Suite T  
St. Charles, IL 60174  
Phone: 630-762-9352  
Fax: 630-587-9170  
[www.totalclaritywealth.com](http://www.totalclaritywealth.com)  
SEC Registration #801-67755

## **Business Continuity Plan** (April 2023)

## **Total Clarity Business Continuity Plan**

Total Clarity's Business Continuity Plan describes the steps to be taken in the event that there is a Significant Business Disruption (SBD) created by internal or external circumstances. This plan will be reviewed, updated, and tested at least annually, and as material changes develop so that we are prepared to respond to unexpected events that may cause a disruption to daily business operations.

### **Emergency Contacts:**

Terry Murphy – President  
Office: 630-762-9352  
Cell: 630-400-6006  
Home Address:  
110 Bahia Via  
Fort Myers Beach, FL 33931

Jeanne Tackett – CCO/VP of Operations  
Office: 630-762-9352  
Cell: 630-220-7422  
Home: 832-299-6720  
Home Address:  
29710 Summerton Dr.  
Spring, TX 77386

Katelin Tickner – Assistant Operations Manager/On-Site Manager  
Office: 630-762-9352  
Cell: 618-791-4214  
Home Address:  
27W156 Sunnyside Ave.  
Winfield, IL 60190

### **Business Continuity Plan Overview:**

Total Clarity will generally manage a Significant Business Disruption (SBD) by:

- Safeguarding our employees' lives and our firm's property;
- Making a financial and operational assessment;
- Recovering and resuming operations quickly;
- Ensuring that all of the firm's books and records are protected
- Providing the continuity of service(s) for Clients wanting to transact business.
- Ensuring plans are set in place for global disruptions such as the recent COVID pandemic

### **Significant Business Disruptions (SBDs)**

Our Business Continuity Plan addresses both internal and external SBDs. Internal SBDs affect only our firm's ability to communicate and transact business; for instance, in the event that a fire occurs in our building. External SBD's are more severe; preventing the operation of the securities markets or affects the business operations of a number of firms. Our response to an external SBD will necessarily rely more on other organizations and systems, especially on the capabilities of key vendors. These include: TD Ameritrade, Charles Schwab, the clearing firm and custodians of some of our Client accounts, LPL Financial Services, another clearing firm and a broker/dealer, Orion Advisor Tech for reporting and Docupace for recordkeeping.

In the event of a pandemic, Total Clarity has plans in place to continue business during a pandemic event. All of our employees have the ability to work from a remote location and can log onto a server using a secure VPN. We will follow the World Health Organization (WHO) alert phases and as the threat of a pandemic becomes greater and a new phase is triggered, we will assess our plans and determine the appropriate course of action. In the event of a public health crisis that resulted in a high rate of employee absenteeism, our plan focuses available personnel on critical business functions that directly support client needs and financial markets. Additionally, we may enact our conditional work from home and/or workforce continuity plan, which includes social distancing and other policies to limit exposure.

In the event that business operations are unable to continue, we will take steps to ensure that Clients have prompt access to their funds and securities through the custodian holding their accounts. Advisors will be able to move their advisory business to LPL's Registered Investment Advisor if needed.

In all instances, our plan would be for our advisors to be able to communicate trade and client requests to custodians or our clients to be able to communicate directly with custodians within 24 hours and if a disruption is affecting our office, city, or region, we will transfer our operations to a site outside of the affected area and resume business within 48 hours.

### **Approval and Execution Authority**

The Chief Compliance Officer is responsible for approving the Business Continuity Plan (BCP) and for conducting the required annual review. Both the Chief Compliance Officer and the President have the authority to execute Total Clarity's BCP. We will test our plan on an annual basis, and update this plan as an outcome of the test, or whenever we have a material change to our operations, structure, business or location. Total Clarity's annual checklist has been established as a result of material changes to our BCP and is effective as of 2022.

### **Plan Location and Access**

Total Clarity maintains and will make available for inspection a copy of its current Business Continuity Plan, along with documentation of BCP annual reviews and any changes that have been made to the BCP. The signed, current copy of the BCP is kept in Total Clarity's Operations Office. An electronic copy of our plan is located on the Total Clarity Operations server. Total Clarity makes this information available to Clients through a Business Continuity Plan Summary. The summary is given to Clients when they open an account with Total Clarity and is available on the Total Clarity website [www.totalclaritywealth.com](http://www.totalclaritywealth.com).

### **Business Description & Key Business Constituents**

Total Clarity is a Registered Investment Adviser and conducts business in equity and fixed income securities. Total Clarity services retail Clients but does not engage in private placements. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not have custody of Client funds or securities. We accept and enter orders. Total Clarity relies on LPL Financial LLC, TD Ameritrade Institutional and Charles Schwab as clearing firms, to provide order execution, order comparison, order allocation, the maintenance of Client accounts, and the delivery of funds and securities.

Each custodian executes its own Business Continuity Plan in the case of an SBD. These plans address their independent courses of action for an internal or external disruption, outline their disaster recovery practices and identify potential contingency plans.

TD Ameritrade Institutional, Charles Schwab and LPL Financial LLC are at the following locations:

**TD Ameritrade Institutional**  
7801 Mesquite Bend Dr. Suite 112  
Irving, Texas 75062-6043  
Phone: 800-431-3500

**Charles Schwab**  
211 Main Street  
San Francisco, CA 94105  
Phone: 800-435-4000

**LPL Financial**  
1055 LPL Way  
Fort Mill, SC 29715  
Phone: 800-877-7210

Other key business constituents include but are not limited to:

**Orion Advisor Solutions**

17605 Wright Street  
Omaha, NE 68130  
Phone: 402-895-1600  
Fax: 402-431-4442

**Orbis Solutions**

1585 Beverly Ct., Suite 123  
Aurora, IL 60502  
Phone: 630-658-1004

**Docupace Technologies, Inc.**

2001 S. Barrington, Suite 215  
Los Angeles, CA 90025  
Phone: 310-445-7722  
Fax: 310-445-7787

**Patrina Corporation**

45 Broadway, Suite 1440  
New York, NY 10006  
Phone: 212-233-1155

**IT Connection**

444 North Route 31, Suite 105  
Crystal Lake, IL 60012  
Phone: 815-526-3600  
Text (Urgent Matters) 815-861-6209

**Advice Pay**

24 E Main St  
Bozeman, MO 59715  
Phone: 406-412-2047  
support@advicepay.com

**DLS Internet Services (phone)**

PO Box 7426  
Algonquin, IL 60102  
Phone: 847-854-4779

**Comcast Business**

1 Comcast Center 1701 JFK Blvd.  
Philadelphia, PA 19103  
Phone: 800-391-3000

**Exemplar Financial Network**

413 E Terra Cotta Avenue  
Crystal Lake, IL 60014  
Phone: 815-459-4550

Total Clarity's custodians and vendors develop their own business continuity plans which are reviewed on an annual basis. They will advise Total Clarity of any material changes to their plans that affect their ability to maintain critical business functions in the event of an SBD. If the clearing firm or broker/dealer experiences an SBD which requires a Business Continuity Plan to be implemented, Total Clarity will be notified and will be given equal access to services along with other existing customers.

The following banks and lenders will provide financing we may need in the event of an internal or external SBD. The bank maintaining the Total Clarity operating account is:

**St. Charles Bank & Trust**

2825 Foxfield Rd.  
St. Charles, IL 60174  
630-377-1555

If STC Capital Bank is unable to provide Total Clarity with financing, we will seek alternative financing from:

**BMO Harris Bank**

3890 E Main St.  
St. Charles, IL 6074  
630-377-4192

## **Total Clarity's Office Locations**

Total Clarity's **main office** location is:  
525 Tyler Rd., Suite T  
St. Charles, IL 60174  
630-762-9352

This location engages in order taking & entry as well as report generation and all back-office functions. The additional locations below also engage in order taking and order entry.

**Total Clarity Wealth Management**  
65 West Jackson Blvd, Suite 1001  
Chicago, IL 60604  
312-280-0200

**Total Clarity Wealth Management**  
110 Bahia Via  
Fort Myers Beach, FL  
630-400-6006

**American Capital Management**  
608 S. Washington Street, Suite 304  
Naperville, IL 60540  
630-778-6260

**Total Clarity Wealth Management**  
6812 N Sumac Rd  
Edwards, IL 61528  
608-345-8473

**Criterion Wealth Advisors**  
201 Houston St. Suite 102  
Batavia, IL 60510  
630-485-5907

## **Alternative Location(s) for Total Clarity Employees**

In the event of a Significant Business Disruption, we will move the staff from the affected office(s) to the closest of our unaffected office locations. If the SBD occurs for less than 3 business days, Total Clarity employees may work from their homes via a secure virtual private network (VPN). If none of our other office locations are available to receive those staff, we will move them to LPL Financial Regional office, Exemplar Advisor Services in Crystal Lake, IL. or they may continue to work from home.

## **Alternate Communications between the Firm and Customers, Employees, and Regulators**

### **a. Employees**

We now communicate with our employees using telephone, email, Slack (IM) 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 fastest and most appropriate in speed and form (written or oral) to communicate with our staff. We will also employ a call tree so that senior management can reach all employees quickly during the disruption. The call tree includes all staff and advisors' home and office phone numbers.

*Please refer to the last page of this document for a full breakdown of our contact/phone tree list.*

### **b. Regulators**

We communicate with our regulators using telephone, email, 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© (9)*

**c. Service Redundancy**

File services are established in geographically separate sites with data continuously replicated between servers and sites for Docupace and the Exemplar remote server. Total Clarity uses a cloud-hosted VoIP phone system provided by a DLS Internet Services. Voice related services (e.g., voicemail, call handling, and desk phone connectivity) can be accessed via any internet connection whether users are working from a Total Clarity office or a remote location. Users are able to re-route calls to alternate phone numbers, such as a personal mobile phone, in the event that VoIP desk phones are not available for use. Remote and secure VPN access is set up to allow key personnel to access services from any location with an internet connection in the event their primary site becomes unusable.

**d. Business Constituents**

Critical business constituents are businesses with which we have an ongoing commercial relationship in support of our operating activities such as vendors providing critical services. 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.

Our other critical business constituents are:

Business Consultant	Services Provided	Alternatives in the event they are unavailable:
Orion Advisor Solutions	Reporting	Black Diamond
Orbis Solutions	Technology Support	IT Connections
Patrina Corporation	Email Retention	Smarsh
Docupace	Books and Records	RedTail Imaging
Advice Pay	Billing	Manually send out invoices

**Clients’ Access to Funds and Securities**

Total Clarity does not have custody of Client funds or securities; they are maintained at the Custodian (LPL, TD Ameritrade, and Charles Schwab). In the event of an internal or external SBD, phone services will be forwarded to the CCO or Designee’s cell phone. For branch offices, phones will be forwarded to the designee assigned at that branch. Total Clarity’s Investment Adviser Representatives will take client orders or instructions via phone and then forward to the custodian for execution. Additionally, Total Clarity will post on the website that Clients may access their funds and securities by contacting the Custodians (LPL, TD Ameritrade, and Charles Schwab) directly.

If for any reason, it became necessary for Total Clarity to dissolve as a business entity; our Clients’ advisory accounts could be transferred to LPL as advisory accounts with LPL acting as the RIA. Clients will continue to receive the full scope of advisory services at this alternative location.

**Reporting Requirements and Data Back-Up/ Recovery**

Total Clarity maintains its primary hardcopy books and records and its electronic records at: 525 Tyler Rd, Suite T, St. Charles, IL 60174; (630) 762-9352. The Vice President of Operations is responsible for the maintenance of these books and records. Total Clarity maintains its back-up softcopy books and records with Docupace. The Docupace system meets SEC 17-4 requirements for document storage and receives a nightly backup frequency. Clients’ hardcopy records are backed-up via Docupace as they are processed by Total Clarity’s Operations Office.

We also use the Exemplar remote server which is maintained and has duplicate backups by IT Connections. Critical servers and associated data are replicated in real time between locations for rapid recovery from a service failure.

In the event that an internal or external SBD causes the loss of our paper records, we will be able to physically recover copies of them from Docupace. Damaged records will not be destroyed until instructed by the CCO and an inventory has been taken.

In addition to those services discussed above, Total Clarity provides Clients with financial planning services and quarterly reporting of overall plan and individual account performance. In the event of an SBD, Total Clarity will meet its reporting requirements by using off-site computers and printers, or produce the reports entirely at an alternate office location (Crystal Lake, Naperville or Oakbrook, IL). Reports will be generated and produced via the Orion website.

### **Conclusion**

Please be aware that, while we have detailed plans in place, we cannot guarantee that we will be successful in achieving recovery in the times mentioned. For example, we may not be able to implement a plan during a disaster as quickly as we expect, or there may be disasters that we have been unable to anticipate and for which we have no plan. Additionally, if parts of our plan are dependent upon third parties, we will have no control over the success or failure of the third party to respond appropriately to the challenges posed at the time of the disaster. Our continuity plans are periodically updated and modified. Updated plan summaries will be made available on our website [www.totalclaritywealth.com](http://www.totalclaritywealth.com) and can be obtained by submitting a written or verbal request.