

DISASTER RECOVERY PLAN

Introduction:

The purpose of this Disaster Recovery Plan is to bolster our company's ability to recover from a business interruption and minimize lost time in the event of an emergency or crisis. Business interruptions can occur due to acts of God, Natural disasters, Fraud attempts, acts of Fraud, Global Pandemics and any other type of an event that would cause a business interruption or a perceived interruption. The aim of this plan is to:

- identify ways to minimize the effects of a business interruption
- assure business continues through an interruption, and that there is
- rapid resumption of business after the interruption passes; and
- create and implement ways to give employees the ability to respond to and to recover from various disasters.

This plan is designed to be as broad in scope as possible, while specifically covering plans for business continuity and resumption should a disruption occur as a result of one or more likely hazards, such as hurricanes, power outages, floods, and fires.

Emergency Contacts:

In the event that our company experiences a disaster or business disruption, our firm's emergency contact persons are:

Scot Hunter, Co-Founder, Partner

Telephone: (954) 332-0689

E-mail: shunter@emeraldfamilyoffice.com

Allan Budelman, Co-Founder, CEO, Partner

Telephone: (954) 332-0691

E-mail: abudelman@emeraldfamilyoffice.com

Melissa Budelman, CCO, Managing Partner

Telephone: (954) 385-6493

E-mail: abudelman@emeraldfamilyoffice.com

These names will be updated in the event of a material change, and our Chief Compliance Officer will review them on a periodic basis.

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. EMFO does not act as a custodian for our client's assets. Therefore, clients always have direct access to their funds and securities at their Bank and/or Custodian. In the event, EMFO is unable to continue its Registered Advisory business, it will follow the rules to notify clients as well as filing form ADV-W, withdrawal from registration.

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 hurricane, 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 custodians, Charles Schwab & Co., Inc. ("Schwab,")and Fidelity Investments.

Approval and Execution Authority

The Partners and Executives as well as the Firm's CCO are responsible for approving the Plan and conducting the required annual review. The Executive team has the authority to execute the DRP.

Plan Location and Access

Our firm will maintain copies of its Disaster Recovery Plan and the annual reviews, as required. An electronic copy of our plan is located on EMFO "server" in the Compliance folder. *The firm also maintains a separate password protected document, which contains detailed instructions to carry out all DRP critical functions including data restoration, alternative location address, phone redirect, client contact, accessing trading and portfolio management programs, etc.*

Business Description

The Firm renders investment advice to its clients regarding the selection of investment management firms or other investment vehicles which purchase securities for the clients' account(s) and actively manage the portfolios on a daily basis. The Firm may also render investment advice to clients regarding accounts of the client managed by other investment advisors or on the selection of mutual funds. The Firm may also act directly as the portfolio manager for certain portions of the client's assets.

We also accept and enter orders and accept and process requests for delivery of funds and securities. All transactions are sent to our custodians, which executes our orders, compares them, allocates them, clears, and settles them. Our custodians also maintain our customers' accounts, can grant customers access to them and delivers funds and securities. Our firm presently services only retail customers.

Schwab is one of our three custodians. We have been given the following contact information to provide to our clients in case they need to contact their Custodian directly:

Charles Schwab & Co., Inc.

1958 Summit Park Drive

Orlando, FL 32810

www.schwab.com

Telephone: 1-800-515-2157 (Schwab Alliance)

Our contact person at our custodian is Christina Aguinaldo, Relationship manager. She is our regional contact with Schwab.

Charles Schwab & Co., Inc.

150 East Palmetto Park Road, Suite 330

Boca Raton, FL 33432

Telephone: (561) 416-1779

Fax: (561) 416-2073

Assistant: Katerina Durcak

Telephone: (561) 416-5807

Our primary contact on our Schwab Account Services Group Team ASG Team 1 is:

Ryan Cole , Senior Manager Telephone (407) 806-6646 Fax: (888) 232-7690

1-855-943-6151

Charles Schwab

Attn: ASG Team #1

1958 Summit Park Drive

Orlando, FL 32810

Our second custodian is Fidelity Investments. We have been given the following contact information to provide to our clients in case they need to contact Fidelity Investments directly:

Fidelity Investments

100 Crosby Parkway

Covington, KY 41015

www.fidelity.com

(800)-544-6666

Our primary contact on our East Silver Client Service Team is Don Thiboutot.

Telephone: (800)-523-1203

Eastsilver@fmr.com

Office Locations

The Firm is located at 2700 S Commerce Parkway, Suite 100, Weston, FL, 33331. We engage in family office services including financial advisory services at this location. The main telephone number is 954-385-9624. If we cannot be reached at this numbers, we may be contacted at our emergency contact number 954-465-5937. The CCO or her designee will be responsible for directing the emergency contact number to a functional location where clients may leave secure messages, get updates on when we will be resuming operations, and speak to a Firm representative.

Alternative Physical Location(s) of Employees

In the event of an event where our location is no longer functional, we will move our staff offsite to a hotel, employee home or any other location with internet access and telephone service. Our staff also has the ability to work remotely from home and have been trained on procedures to keep their online access and physical space safe to maintain our controls of protecting client's non-public material information.

Our data is backed up using a backup service, which maintains physical server locations throughout the country. We believe the service is fully compliant with federal mandates Sarbanes-Oxley, GLBA and relevant Acts of the SEC.

In addition, should we not be able to access our online backup for any reason, the Schwab Institutional website, Fidelity Wealthscape website, our portfolio management system (Portfolio Center), CRM, trading software, and our email service provider are all web based and accessible to us from any location where there is internet service. If our facility is not operational, we will be able to use alternative locations with computer facilities or use our laptops to view accounts, request funds and execute transactions, and communicate with our clients via our usual email addresses. Having almost all critical systems web based allows us to fulfill most of our critical requirements seamlessly. Attached to this Disaster Recovery Plan are the Business Continuance Policy Documents for Schwab, , Tamarac (Portfolio Management & Reporting, CRM, Trading Platform) and Global Relay (Email).

Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our custodians, Schwab, and Fidelity. In the event of an internal or external SBD, if telephone service is available, our staff will take customer orders or instructions and contact our custodians on their behalf. If Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting us at (954) 385-9624, or Schwab at (800) 515-2157, or Fidelity at (800)-544-6666. We will also provide an emergency contact number (954)-465-5937 via our website for use if our regular number is not functional. The firm will make this information available to customers through its disclosure policy.

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

Our firm maintains its primary hard copy books and records and its electronic records at 2700 S Commerce Parkway, Suite 100, Weston, FL 33331. The firm's CCO and/or her designee shall be responsible for the maintenance of the books and records. They can be reached at (954)-332-0691 or (954)-465-5939.

Our firm maintains the following document types and forms that are not transmitted to our clearing firm:

- Investment Advisory Agreement
- Client Profile & Questionnaire
- Client Proposals
- Correspondence

Firm Financial Books and Records

These forms are scanned and stored on our server. The firm automatically backs up its electronic records daily and keeps a copy in the Cloud via an online backup service.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them where possible. If our primary site is inoperable, we will continue operations from our backup site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from online backup service, or, if our primary site is inoperable, continue operations from our backup site or an alternate location.

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, and regulators. Although the effects of an SBD will determine the means of alternative communication, information will be available by contacting us at the following numbers or viewing our website at:

Our Website: www.emeraldfamilyoffice.com

Scot Hunter, Co-Founder, Chief Strategic Office

Telephone: (954) 332-0689

E-mail: shunter@emeraldfamilyoffice.com

Allan Budelman, Co-Founder, CEO

Telephone: (954) 332-0691

E-mail: abudelman@emeraldfamilyoffice.com

If you cannot access us through the above numbers, you should call our alternative number, (954)-465-5937, for instructions on how to contact us or our custodians, Schwab and/or Fidelity, and on how we can assist you with promptly accessing your funds and securities, entering trade orders, and processing any other trade-related, cash and security transfer transactions.

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

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 services are provided by our custodians, Schwab and Fidelity. All of the aforementioned activities are transacted through:

- (1) the Schwab institutional website or via telephone with our service team located at:

Charles Schwab & Company
1958 Summit Park Drive
Orlando, FL 32810
Telephone: (888)-507-0198 Fax: (888)-333-8573
Schwab Institutional Website: www.schwabinstitutional.com

- (2) Fidelity Investments

100 Crosby Parkway, KC1J
Covington, KY 41015-8010
Telephone: (800)-523-1203
www.wealthscape.com

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, entry and execution. Our custodians provide, 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 custodians' contracts provide that our custodians will maintain a business continuity plan and the capacity to execute that plan. Our custodians represent that they will advise us of any material changes to their plan that might affect our ability to maintain our business, and present us with an executive summary of their plan, attached. In the event our custodians execute their plans, they represent that they will notify us of such execution and will provide us equal access to services as their other customers. If we reasonably determine that our custodians have not or cannot put their plans in place quickly enough to meet our needs, or are otherwise unable to provide access to such services, our custodians represent that they will assist us in seeking services from alternative sources.

Our custodians represent that they back up our records at a remote or out of region site. Our custodians represent that they operate a backup operating facility in a geographically separate area with the capability to conduct the same volume of business as their primary site. Our custodians have also confirmed the effectiveness of their backup arrangements to recover from a wide-scale disruption by testing. They have confirmed that they test their backup arrangements annually or as designated by regulatory requirements at all locations.

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, the 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 custodians have the following SBD recovery time and resumption objectives: recovery time period of minutes in most cases; and resumption time of within one business day.

Order Taking and Requests For Funds or Securities

Currently, our firm receives orders from customers via telephone or in person. During an SBD, either internal or external, we will continue to take orders through either 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 are available to send us their orders. Customers will be informed of alternatives by e-mail or via our website. If necessary, we will advise our customers to place orders directly with our custodians electronically or at the phone numbers listed above, who service accounts directly and will be able to access client accounts for trading, disbursements, and other requests.

Order Entry

Currently, our firm enters orders by recording them on paper and transmitting them to our custodians electronically or telephonically. In the event of an internal SBD, we will enter and send records to our custodians by the fastest alternative means available, which include telephone, their websites, or email. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to Schwab or Fidelity by the fastest means available when they resume operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with Schwab, or Fidelity for order entry.

Mission Critical Systems Provided by Our Custodians

Our firm relies, by contract, on Schwab and Fidelity to provide order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

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

Customers

We now communicate with our clients using the telephone, e-mail, our Web site, fax, U.S. mail, and in-person visits at our firm or at the client’s location. In the event of an SBD, we will assess which means of communication are still available, 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 him or her on the telephone and follow up where a record is needed with a paper copy in the U.S. mail.

Employees

We now communicate with our employees using the telephone, e-mail, and in person. In the event of an SBD, we will assess which means of communication are still available, 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:

Melissa Budelman, Allan Budelman, and Scot Hunter have the authority to invoke the use of the call tree as stated below.

Melissa Budelman or Allan Budelman will contact: Scot Hunter and Rachael Gaer

Rachael Gaer will contact Karla Podalsky, Marlene Santos, Antoun Chebat, Oscar Silva and Debra Fagien

Karla Podalsky will contact Keith Stoloff, Leana Alu, Colm Smith, George Suarez and Saeki Suto

The contact information for EMFO employees is attached to this document. It will be reviewed and amended on an annual basis.

EXHIBIT M

Employee / Location	Email Address	Direct Number	Cell Number
EMFO, LLC		954-385-9624	
Leana Alu	lalu@emeraldfamilyoffice.com	954-385-6783	954-600-2326

Allan Budelman	abudelman@emeraldfamilyoffice.com	954-332-0691	954-465-5939
Melissa Budelman	mbudelman@emeraldfamilyoffice.com	954-385-6493	954-465-5937
Marlene Diniz Santos	mdiniz@emeraldfamilyoffice.com	954-320-0491	954-562-5104
Rachael Gaer	rgaer@emeraldfamilyoffice.com	954-769-0647	954-445-7552
Scot Hunter - desk	shunter@emeraldfamilyoffice.com	954-332-0689	954-553-5619
Karla Podalsky	kpodalsky@emeraldfamilyoffice.com	954-332-0696	954-558-4400
Colm Smith	csmith@emeraldfamilyoffice.com	954-210-6127	860-712-7766
Keith Stoloff	kstoloff@emeraldfamilyoffice.com	954-681-4314	954-559-1165
Debra Fagien	dfagien@emeraldfamilyoffice.com	561-271-5771	561-271-5771
George Suarez	gsuarez@emeraldfamilyoffice.com	954-353-3042	954-258-7472
Saeki Suto	ssuto@emeraldfamilyoffice.com	954-332-0694	954-203-4391
Oscar Silva	osilva@emeraldfamilyoffice.com	754-241-9925	954-451-8905

If telephone service is not available, EMFO employees will rally at our office location as soon as logistically possible.

Regulators

We are currently registered with the SEC as a registered investment advisor. We communicate with our regulators via telephone, e-mail, website, fax, U.S. mail, and in person. In the event of an SBD, we will assess which means of communication are still available, 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.

Critical Business Constituents, Banks, and other Parties

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. The firm maintains a list of vendors under in a separate document.

Regulatory Reporting

Our firm is subject to regulation by the Securities Exchange Commission (SEC). We now file reports with our regulators using paper copies in the US mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC and other regulators to determine which means of filing are still available, 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.

We will notify the Office of Financial Regulation, Bureau of Regulatory Review to report any office closures or relocations by providing the date and time of closing, the address of the affected office, and any relocation addresses at:

E-mail: IARDLIVE@SEC.GOV

Fax: (850) 410-9914

Telephone: (850) 410-9805

Contact information for our regulators follows:

The United States Securities and Exchange Commission
Office of Compliance Inspections and Examinations
450 Fifth Street NW
Washington, DC 20549 Telephone: (202) 942-7460

Office of Financial Regulation
Bureau of Regulatory Review
200 East Gaines Street
Tallahassee, FL 32399
Telephone: (850) 410-9805 Fax: (850) 410-9914
Email: IARDLIVE@SEC.GOV

IARD System
<http://webcrd.com>
Telephone: (850) 410-9805

Disclosure of Disaster Recovery Plan

We post the disclosure statement on our Web site and mail it to customers upon request. **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 firms. In addition, our firm will review this Disaster Recovery Plan annually during DRP Review for any changes in our operations, structure, business, or location or those of our clearing firms.