

**GA PINCUS FUNDS, LLC**

## **BUSINESS CONTINUITY PLAN (BCP)**

**Adopted:** January 1, 2024

**Last Updated:** February 18, 2026

**Responsible Officer:** Gabriel Pincus

---

### **1. PURPOSE**

This Business Continuity Plan (“BCP”) establishes procedures designed to ensure the Firm can continue critical operations during and after a significant business disruption (“SBD”).

The Firm is a single-member investment advisory firm. This BCP is tailored to the Firm’s size, structure, and operational complexity.

---

### **2. SCOPE**

This BCP addresses:

- Natural disasters
  - Power outages
  - Internet outages
  - Cybersecurity incidents
  - Custodian disruptions
  - Key-person incapacity
  - 
  - Vendor disruptions
- 

### **3. CRITICAL BUSINESS FUNCTIONS**

The Firm’s critical functions include:

1. Client communications
  2. Portfolio management and monitoring
-

3. Trade execution
4. Fee billing
5. Custody oversight (trustee responsibilities)
6. Recordkeeping
7. Regulatory filings

---

## 4. KEY CONTACT INFORMATION

### 4.1 Firm Contact

Gabriel Pincus  
1574 Woodberry Court, Brentwood, TN 37027  
917-597-1450  
Gabriel@gapincusfunds.com

### 4.2 Custodian

Charles Schwab & Co., Inc  
Schwab Advisor Services  
877-774-3892  
Charles Schwab & Co., Inc.,  
El Paso Operation Center,  
P.O. Box 982600,  
El Paso, TX 79998

### 4.3 Critical Vendors

- Email provider – Microsoft 365
- Cloud storage provider – Drop Box, One Drive
- Accountant – Tailwind Financial

Contact list maintained separately and updated annually.

---

## 5. ALTERNATE WORK LOCATION

Because the Firm is a solo practice, operations can be conducted remotely.

In the event of office disruption:

- Work will continue from home office
  - Secure laptop with encrypted drive will be used
  - VPN required for public networks
  - Multi-factor authentication enabled
- 

### 6. DATA BACKUP & RECOVERY

The Firm maintains:

- Cloud-based storage with encrypted backup
- Custodian-hosted records
- Email archiving system
- Regular backup verification

In the event of data loss:

- Restore from cloud backup
  - Retrieve client records from custodian portal
  - Recover archived emails
- 

### 7. CYBER INCIDENT RESPONSE

If a cybersecurity event occurs:

1. Contain and isolate affected systems
2. Contact IT/security provider
3. Preserve evidence
4. Assess client impact
5. Notify cybersecurity insurer (if applicable)
6. Determine regulatory notification obligations
7. Communicate with clients as necessary

Operations may temporarily shift to custodian portals and phone communications.

---

## **8. CUSTODIAN DISRUPTION**

If Charles Schwab systems are unavailable:

- Notify clients of temporary disruption
  - Suspend non-essential trading
  - Resume operations once custodian systems are restored
  - Document the disruption
- 

## **9. COMMUNICATION PLAN**

In the event of a disruption:

- Clients will be notified via email and/or phone
  - If email unavailable, use alternate email or phone
  - If internet unavailable, use mobile hotspot
  - Notice will be posted on Firm website (if available)
- 

## **10. KEY PERSON RISK**

The Firm is operated solely by Gabriel Pincus.

In the event of incapacity:

- Clients may contact custodian directly
- Custodian maintains independent access to accounts
- Trusted emergency contact list maintained
- Estate planning documents designate successor decision-maker (if applicable)

The Firm recommends clients maintain direct access to custodian accounts at all times.

---

## **11. TRUSTEE CONTINUITY**

For trusts where the Firm serves as trustee or co-trustee:

---

- Dual-signature requirements protect against unilateral action
- Co-trustee may act if applicable
- Custodian retains independent custody
- Trust documents designate successor trustee

Copies of trust documents maintained securely.

---

## 12. FINANCIAL & REGULATORY OBLIGATIONS

The Firm shall:

- Maintain sufficient liquidity to operate during disruption
- Continue required regulatory filings
- Maintain books and records

If regulatory deadlines are impacted, the Firm will communicate with Tennessee regulators as appropriate.

---

## 13. TESTING & REVIEW

The Firm shall:

- Review this BCP annually
  - Conduct tabletop scenario review annually
  - Document review as part of Annual Compliance Review
- 

## 14. PLAN DISTRIBUTION

A summary of this BCP shall be provided to clients upon request and described in Form ADV.

---

## 15. PLAN ACTIVATION

This BCP shall be activated when:

- Critical systems are unavailable
-

## **GA P INCUS FUNDS**

- Office location becomes inaccessible
- Cybersecurity incident materially disrupts operations
- Key person is incapacitated

Activation and recovery steps shall be documented.