

Gulfstream CM LLC Business Continuity Planning

Gulfstream CM LLC has developed a Business Continuity Plan addressing how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us If after a significant business disruption, you cannot contact us as you usually do at (908) 918-1600 you should call our back-up number at (646) 321-4006. If you cannot access us through either of those means, you should contact our clearing firm, Pershing, LLC, at (201) 413-3635 for recorded instructions or visit the "About Pershing" section of the Pershing website at www.pershing.com and click on "Business Continuity and Other Disclosures" at the bottom of the screen for instructions on how Pershing may provide prompt access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions.

Our Business Continuity Plan We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our clients to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our clients prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Pershing, LLC, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within (4) four hours. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within one day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within two days. In either situation, we plan to continue in business and notify you through our client emergency number, (646) 321-4006, with specific instructions on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, clients are assured prompt access to their funds and securities by contacting Pershing directly to process limited trade-related transactions, cash disbursements, security transfers or account closure requests. Instructions to Pershing must be in writing and transmitted via facsimile at (201) 413-5368 or by postal service as follows: Pershing LLC, P. O. Box 2065 Jersey City, NJ 07303-2065

For more information If you have questions about our business continuity planning, you can contact us at (908) 918-1600.