

WALL STREET MONEY CENTER BUSINESS CONTINUITY PLAN

(B C P) AN EXECUTIVE MEMO

Wall Street Money Center Corp. has put in place, in conjunction with the business contingency plan established by Pershing & Sterne Agee & Leach, our clearing firms, the following business continuity plan required by NYSE Rule 446 and NASD Rule 3510.

In case of business interruption at our corporate office at:
2385 Executive Center Drive, Suite #100
Boca Raton, FL 33431

Business will continue as usual at the following:

Alternate Physical location #1:
5889 Windsor Terrace
Boca Raton, FL 33496

&

Alternate Physical Location 2:
10308 Falls Grove Street

Orlando, FL 32826

Both alternate physical locations are prepared to conduct business in operations and trading functions in the event of a business interruption at the corporate office.

Alternate communications between the firm & its employees — WSMC has established as part of its BCP a calling tree using either, land line, internet or cell phone capabilities between and among all of its operations and administrative personnel.

Alternative communications between customers & the firm - customers of the firm rely on existing communication methods with their respective broker dealer to obtain account information and/or request distributions or transfer of funds. In turn we have communication capabilities via telephone or internet with Pershing and/or Sterne Agee & Leach. All calls/messages left at the corporate office can be "picked up" via our answering service from remote locations and will be responded to from either of our alternate offices. All requests for service will be processed from the alternate office.

Wall Street Money Center Corp. Business Continuity Plan

Peter Bruno, President / CEO
2385 Executive Center Drive, Suite 100
Boca Raton, FL.33431
Tel: (561) 962-2850

1. Emergency Contact Persons

Our firm's two emergency contact persons are: Sarah Lawson, 561-789-8240, wsmc4@earthlink.net and/or sarahlawson@wsmcc.info, and Peter Bruno, a registered principal of the firm, 561-862-0126, allfunds@aol.com and/or Peterbruno@wsmcc.info. An alternate person is Anthony Polito, a registered principal of the firm, 561-703-8284, wsmc3@bellsouth.net. These names will be updated in the event of a material change, and an Executive Representative will review them within 10 business 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 allowing our clients to transact business. In the event that we determine we are unable to continue business, we will assure clients prompt access to their fund and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBD's, internal and external. Internal SBD's affect only our firm's ability to communicate and do business, such as a fire in our building. External SBD's prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, 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 clearing firms.

B. Approval and Execution Authority

Peter Bruno, a registered principal, is responsible for approving the plan and for conducting the annual review. In his absence, Sarah Lawson, Office Manager, has the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP plan and annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located in a file folder Binder at our office named Wall Street Money Center Corp. BCP and at EVault, a BCP Repository Service offered by FINRA.

3. Business Description

Our firm conducts business in equity, fixed income, variable annuity and potentially some life insurance products. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firms, who execute our orders, compare them, allocate them, clears and settles them. Our clearing firms also maintain our customers' accounts, can grant customers access to them, and deliver funds and securities. Our firm services retail customers. We do not engage in any private placements.

Our clearing firms are Pershing LLC and Sterne Agee & Leach and can be contacted via the following:

Pershing LLC

Mail - One Pershing Plaza

Jersey City, NJ 07399

Telephone- 1-800-635-9881

Fax- 1-866-355-5570

Web Site- www.pershing.com

Our contact person at this clearing firm is:

Name- Brian Greenstein

Telephone- 1-800-635-9881

Email- bgreenstein@pershng.com

Sterne Agee & Leach can be contacted via the following:

Mail - 813 Shades Creek Parkway, Suite 100

Birmingham, AL 35209

Telephone- 1-800-264-4863

Fax- 1-205-414-3210

Web Site- www.SalClearing.com

Our contact person at Sterne Agee & Leach is:

Name- Don Exner

Telephone- 1-561-368-4355

Email- dexner@salfin.com

4. Office Location

Our office location is 2385 Executive Center Drive, Boca FL.33431. The main telephone number is (561) 962-2850. Our employees travel to our office by means of car. We engage in client order taking, order entry and order execution at this location. A secondary Research location is also used for order entry and order execution from our RIA under common ownership.

5. Alternative Physical Location(s) of Employees

In the event of an SBD, our staff will work from their homes or any remote location utilizing laptop computers. We have the ability to access our clearing firms via a website connection and all client matters can be handled on a priority basis. All management personnel will stay in constant touch via cell phones.

6. Customer's Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at either of our two clearing firms, Sterne Agee & Leach and Pershing LLC. In the event of an internal or external SBD, if telephone service is available, our registered persons will take client orders or instructions and contact our clearing firms on their behalf, and if our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting Sterne Agee & Leach or Pershing LLC directly. The firm will make this information available to clients through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

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

Our firm maintains its primary hard copy books and records and its electronic records at 2385 Executive Center Drive, Boca FL. Sarah Lawson, Office is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm:

- A. Management Agreements
- B. Investment Objective Questionnaire

Our firm maintains its back-up hard copy books and records at 5889 Windsor Terrace, Boca Raton, Florida and or Public Storage Facilities in Boca Raton Florida. In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site or an alternate location. For the loss of electronic records, we will either physical recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

8. Financial and Operations Assesments

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include, our Web site, telephone voice mail, secure e-mail and our clearing firms Web pages. In addition, we will retrieve our key activity records as described in the section above, Data Back-up and Recovery (Hard Copy and Electronic)

B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our clearing firm to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter parties or otherwise continue to fund our operations, we will file appropriate notices with our regulators and immediately take any appropriate and necessary steps.

9. Mission Critical Systems

Our firms "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 client accounts & access to client accounts. We have primary responsibility for establishing and maintaining our business relationships with our clients and have sole responsibility for our mission critical functions of order taking and entry. Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, and the delivery of funds and securities.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business (a copy of the Business Continuity plan statements are attached). In the event our clearing firms execute their plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing its redundant systems.

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, 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 clearing firm has the following SBD recovery time and resumption objectives: recovery time period of within 6 hours; and the resumption time of within the same business day.

A. Our Firm's Critical Systems

1. Order Taking

Currently, clients have access to their accounts and can place orders within their accounts on line at Sterne Agee & Leach. On a rare and infrequent basis, our firm receives orders from clients accounts, maintained at Pershing LLC, via telephone. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our clients when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by an emergency 800 phone number that will be activated by dialing our home office number. That phone number will advise our customers to place orders directly with our clearing firm if necessary.

2. Order Entry

Currently, our firm enters orders by electronically sending them to our clearing firm. In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest means available, which include fax, e-mail or telephone. In the event of an external SBD, we may refer our clients to deal directly with our clearing firm for order entry.

B. Mission Critical Systems Provided by Our Clearing Firm

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

10. Alternate Communications Between the Firm and Clients, Employees, and Regulators

A. Customers

We now communicate with our customers using the telephone, e-mail, our fax, U.S. mail, and in person visits at our firm or at the others location. 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. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with a paper copy via U.S. mail.

B. Employees

We now communicate with our employees using the telephone and in person. In the event of an SBD, we will assess which means of communication are available to us and use the means closest in speed to the means we used in the past to communicate with the other party. We will also employ a calling tree so that senior management can reach all employees quickly during an SBD. The calling tree includes all staff home numbers.

The person to invoke use of the calling tree is: Peter Bruno

Call Recipients

Sarah Lawson

Anthony Polito

C. Regulators

We are members of FINRA. We communicate with our regulators using the telephone, e-mail, 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 form (written and oral) to the means we used in the past to communicate with the other party.

11. Critical Business Constituents, Banks and Counter Parties

A. Business constituents

We have contacted our critical business constituents and determined the extent to which we can continue our business relationship with them in the 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.

B. Banks

We have contacted our banks to determine if they can continue to provide the service we will need in light of the internal or external SBD. The bank maintaining our operating account is Wachovia Bank, 2600 N. Military Trail, Suite 150, Boca Raton, FL 33431, and our contact is the Branch Manager, Mr. Everett Donegan.

C. CounterParties

We have contacted our critical counter parties, such as our clearing firms or contacted their counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

12. Regulatory Reporting

Our firm is subject to regulation by the SEC and FINRA and the State of Florida. We now file reports with our regulators using paper copies, in the U.S. mail and electronically using fax, e-mail and the Internet. In the event of an SBD, we will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us, 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.

13. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to clients on request. PDF File Copies of our clearing firms BCP are attached and located at the clearing firm website with copies available upon request.

14. 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 firm. In addition, our firm will review this BCP plan annually, on July 1st, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

15. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to clients in event of an SBD.


Signed: Peter Bruno

Title: President

Annual Review Date: November 15th, 2010