

GWM Group Inc.

Business Continuity Plan (BCP)

General guidance and background: Please see FINRA Notice to Members (NtM) 04-37; General Accounting Office, "Report on Potential Terrorist Attacks: Additional Actions Needed to Better Prepare Critical Financial Market Participants," Report Nos. GAO-03-251 and GAO-03-414 (Feb. 2003) (available at <http://www.gao.gov/>); The Securities and Exchange Commission/Board of Governors of the Federal Reserve System/Office of the Comptroller of the Currency Joint White Paper on Business Continuity Planning <http://www.sec.gov/>; and business continuity planning Web sites, including http://www.sia.com/business_continuity; www.thebci.org; www.business-continuity.com; www.bsiglobal.com; www.fsscc.org; www.londonprepared.gov.uk/business/businesscont/ and www.drii.org.

Emergency Contact Persons

Our firm's two emergency contact persons are: David Wu (972)644-9200 at dwu@gwmgroupinc.com or Treasure_Financial@yahoo.com and Jose Gonzalez at (646)403-4601 or email at jcgonzalez@gwmgroupinc.com These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days of the end of each quarter.

Rule: FINRA Rule 3520.

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. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

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 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 firm.

Approval and Execution Authority

Jose C. Gonzalez, a registered principal, is responsible for approving the plan and for conducting the required annual review. Jose C. Gonzalez, President has the authority to execute this BCP.

Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on Zip Disk in the File- RLCCO – Business Cont. Plan or available at on the hard drive of alternate branch locations.

Business Description

Our firm conducts business in equity, fixed income, and derivative securities. 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 firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services retail and institutional customers. We do not engage in any private placements. GWM Group has two clearing relationships

1- Interactive Brokers, 209 South LaSalle Street, 10th Floor, Chicago, IL 60604 and our contact person at that clearing firm is William C. McGowan at (312) 542-6846 or at bmcgowan@interactivebrokers.com

2- National Financial Services LLC, 200 Liberty Street, New York, NY 10281. Telephone (800) 877-2410.

Office Locations

List the locations of all of your offices, registered and unregistered, and state the means of transportation that employees may use to reach that facility. State also which mission critical systems, as defined below, take place at each location.

Office Location #1

Our Location #1 Office will be located at 220 Fifth Avenue, 20th Floor, New York, NY, 10001. Its main telephone number is (646) 403-4601. Our employees may travel to that office by means of foot, car, or bus. We engage in order taking and entry at this location.

Office Location #2

Our Location #2 Office is located at 777 S. Central Expway, Suite 107. Richardson, TX 75080. Its main telephone number is (972) 644-9200. Our employees may travel to that office by means of foot, car, bus or subway. We engage in order taking and entry at this location.

Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected offices to the closest of our unaffected office locations. If none of our other office locations is available to receive those staff, we will move them to 1 Shore In, apt 1101, Jersey City, NJ 07310. Its main telephone number is (646) 206-1788.

Rule: FINRA Rule 3510(c)(6).

Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm ,Interactive Brokers and National Financial Services LLC. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm 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 Interactive Brokers and National Financial Services LLC. The firm will make this information available to customers 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.

Rules: FINRA Rule 3510(a); Securities Exchange Act Rule 15c3-1; 15 U.S.C. 78eee (2003).

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

Our firm maintains its primary hard copy books and records and its electronic records at 220 Fifth Avenue 20th floor, New York, NY 10001 Jose C. Gonzalez, Director at (646) 403-4601 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: All Broker-Dealer required paperwork. Our firm maintains its back-up hard copy books and records at the same address given above, but they are secured on Zip drives in a locked fireproof file cabinet or maintained for redundancy on hard drives at other office locations. Jose C. Gonzalez, Director at (646)403-4601 is responsible for the maintenance of these backup books and records. Our firm backs up its paper records by copying and taking them to our back-up site. We back up our records every quarter. The firm backs up its electronic records monthly by Zip drive or delivery to remote locations and keeps a copy per above. 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. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically 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.

Rule: FINRA Rule 3510(c)(1).

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

Rules: FINRA Rules 3510(c)(3) & (f)(2).

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, critical banks, and investors 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 request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, including ceasing to do business.

Rules: FINRA Rules 3510(c)(3), (c)(8) & (f)(2).

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. More specifically, these systems include: desktop PC at main location and desktop PC at back up location, phone system and high-speed internet connection to Interactive Brokers Trader Workstation system and National Financial Services LLC Streetscape. 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 and entry. Our clearing firm provides, 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 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. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provides us equal access to services as its other customers.. 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, and it has confirmed that it tests its back-up arrangements. 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 Firm's Mission Critical Systems

Order Taking

Currently, our firm receives orders from customers via telephone or in person visits by the customer. 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 customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by telephone. If necessary, we will advise our customers to place orders directly with our clearing firm at (214) 859-1080 for Interactive Brokers LLC 1 (312) 542-6901 and (212) 335-5078 for National Financial Services LLC.

Order Entry

Currently, our firm enters orders by recording them on paper and electronically and sending them to our clearing firm electronically or telephonically. We place customer orders through Trader Workstation and Streetscape.. In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include our alternative site. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations.

Order Execution

Interactive Brokers LLC or National Financial Services LLC executes all our orders. We rely on their systems and back-ups for all order execution.

Other Services Currently Provided to Customers

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.

Rules: FINRA Rules 3510(c) & (f)(1).

Alternate Communications between the Firm and Customers,

Employees and Regulators

A. Customers

We now communicate with our customers using the telephone, e-mail, fax, U.S. mail, and in person visits at our firm or at the other's 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 paper copy in the U.S. mail.

Rule: FINRA Rule 3510(c)(4).

B. Employees

The firm presently has seven employees, so the communication between employees will invoke use of the call tree is: Jose C. Gonzalez will call everybody,. In case something happens to MR Gonzalez , Mr. Wu and Mr. Saviron will be in charge of contacting all GWM employees. All employees will be contacted both by phone and email.

Caller Call Recipients

David Wu, President (972) 644-9200 & (469) 682-8847.

Jose C Gonzalez, Vice President (646) 403-4601 & (646) 206-1788

Stephen Yu, Financial Advisor (978) 551 3686

Rule: FINRA Rule 3510(c)(5).

C. Regulators

We are currently members of the following FINRA and SIPC. 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 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 3510(c)(9).

Critical Business Constituents, Banks, and Counter-Parties

Business constituents

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. Our major suppliers are: *Interactive Brokers LLC or National Financial Services LLC*

Rules: FINRA Rule 3510(c)(7).

Banks

We presently have a banking relationships with Bank of America and Southwest Securities. The bank maintaining our Proprietary Account of Introducing Brokers/Dealers (PAIB account) is Southwest Securities. In case of emergency GWM Group will try to get enough financing from Bank of America to keep operating.

Rules: FINRA Rule 3510(c)(7).

Counter-Parties

We have contacted our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or

contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Rules: FINRA Rules 3510(a) &(c)(7).

Regulatory Reporting

Our firm is subject to regulation by: FINRA and SEC. 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.

Rule: FINRA Rule 3510(c)(8).

Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at account opening. We also mail it to customers upon request. Our disclosure statement is attached.

Rule: FINRA Rule 3510(e)

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 annually, on October 31, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

Rule: FINRA Rule 3510(b).

Senior Manager Approval

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

Rule: FINRA Rule 3510(d).

Jose C. Gonzalez / David Wu

New York, June 20th, 2009