

Empirical Research Partners

BCP Disclosure Statement for Empirical Research Partners, LLC

Empirical Research Partners, LLC has developed a Business Continuity Plan on 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 (212) 803-8000, you should go to our website (<http://www.empirical-research.com>) or call our alternative number, (201) 485-8228, for instructions about how to contact us. If you cannot access us through either of these means, you should contact our clearing firms for instructions on how they may provide access to your funds and securities, and accept orders or process cash or security transfer transactions on your behalf.

The following is a list of contact information for the clearing firms we use:

UBS Securities, LLC
677 Washington Blvd
Stamford, CT 06901
Contact: Ralph E. Davis
(203) 719-3043

Merrill Lynch
One Bryant Park
New York, NY 10036
Contact: Ralph Merola
(646) 855-3986

J.P. Morgan Securities Corp.
1 Metrotech Center North
Brooklyn, NY 11201
Contact: Nick Macchia
(212) 622-6476

Barclays Capital Inc.
745 7th Ave, 3rd Fl.
New York, NY 10019
Contact: Chris Caras
(212) 526-9490

Pershing LLC
1 Pershing Plaza
Jersey City, NJ 07399
Contact: Jim Ianone
(201) 413-2813

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 customers 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.

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

Our clearing firms (listed above) back up their 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 each of our clearing firms that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within five business days. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in scope, and as such may affect 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 business 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 five business days. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site (<http://www.empirical-research.com>) our main customer contact number, (212) 803-8000, or our alternative contact number, (201) 485-8228, about how to contact us. If the business disruption is so severe that it prevents us from remaining in business, we will assure that our customers will have prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us by calling (212) 803-8000 or via e-mail at information@empirical-research.com.