

**ANDES CAPITAL GROUP, LLC**  
Business Continuity Plan

April 2023

## **Firm Policy**

The firm considers a Significant Business Disruption (SBD) to mean any event, internally or externally, which disrupts or prevents the firm from utilizing its mission critical systems and/or performing its mission critical functions. An internal SBD disrupts or prevents *only* the firm's ability to utilize its mission critical systems and/or perform its mission critical functions. An external SBD disrupts or prevents multiple firms and businesses from utilizing their mission critical systems and/or performing their mission critical functions. An external SBD can be local, regional, national, or global.

The firm's Business Continuity Plan (BCP) is designed to reasonably respond to a SBD by (i) providing customers with continued access to their funds and securities; (ii) continuing communication with mission critical business partners, mission critical employees, and regulators; (iii) recovering mission critical systems, functions, and records; and (iv) making a financial and operational assessment. The firm expects to recover from external SBDs within 24 hours and internal SBDs within one hour.

At the core of the firm's BCP is communication with customers, mission critical business partners, mission critical employees, and regulators before the onset of any SBD. At the time of account opening, the firm provides customers with (i) instructions on how to gain prompt access their funds and securities in the event of a SBD and/or the firm cannot continue business; (ii) secondary methods by which to communicate with the firm in the event of a SBD; and (iii) disclosure relating to the firm's business continuity planning. Such information is mailed to customers upon request. The firm has provided its mission critical business partners and FINRA with secondary contact information in the event of a SBD. The firm has received secondary contact information from its mission critical business partners. The firm has provided its mission critical employees with a copy of this BCP and training on procedures during a SBD.

This BCP incorporates the 10 critical elements specified in FINRA Rule 4370. Please see Exhibit C for a listing of these elements and their exact location within this BCP.

The firm maintains both an electronic and a paper copy of this BCP both on-site and off-site. Each mission critical employee is required to maintain a copy of this BCP off-site and report the location to the firm. Please see Schedule K for a list of BCP locations.

In the event the firm executes this plan, the firm will immediately notify its FINRA District Office utilizing the quickest communication means available to the firm.

## **Business Description**

The firm is an introducing broker dealer and conducts its business via selling agreements with product sponsors and a clearing agreement with its clearing firm, RBC Correspondent Services. The firm transacts business with retail and institutional customers and offers the following products and/or services: listed and over-the-counter securities, municipal bonds, municipal bond underwriting, and corporate debt. The firm neither holds customer funds or securities nor does the firm perform any type of clearing function for itself or others. Transactions in a brokerage account are sent directly to RBC Correspondent Services for order execution, comparison, allocation, clearing, and settlement. The firm may also go to other entities besides RBC Correspondent Services in order to execute securities transactions. RBC Correspondent Services maintains customer accounts, delivers funds and securities, and can grant customers access to their accounts.

## **Mission Critical Business Partners**

The firm considers “mission critical business partners” to mean its clearing firm and product sponsors. The firm’s continued contact with its mission critical business partners is necessary for the operation of the firm in the conduct of its securities business. Please see Schedule A for a list of mission critical business partners.

RBC Correspondent Services (“RBC” or “clearing firm”) provides order execution, comparison, allocation, clearance, settlement, maintenance of customer accounts, access to customer accounts, and delivery of funds and securities. The clearing firm contract provides that the clearing firm will maintain a business continuity plan and the capacity to execute that plan. RBC represents:

- that it will advise the firm of any material changes to its plan that might affect the firm’s ability to maintain its business. The clearing firm maintains a copy of its plan on its website.
- that it will notify the firm whenever it executes its plan and provide the firm with equal access to services as its other customers.
- that it will assist the firm in seeking services from an alternative source if the firm reasonably determines that the clearing firm has not or cannot put its plan in place quickly enough to meet the firm’s needs, or is otherwise unable to provide access to such services.
- that it backs up the firm’s records at a remote site and that it operates a back-up facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. The clearing firm tests its back-up arrangements every month and it has confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption.

The clearing firm’s plan includes the following SBD objectives:

- Recovery time period of 24 hours. Refers to the restoration of clearing and settlement activities after a wide-scale disruption.
- Resumption time of 36 hours. Refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

In its role as the correspondent for Andes Capital, RBC and any product sponsor that the firm conducts business with maintains customer accounts and deliver customer funds. Although product sponsors are not currently required to maintain a plan, the firm will attempt to obtain alternate contact information and/or emergency instructions from product sponsors.

The firm will provide RBC with a copy of its plan. At the time the firm enters into a selling agreement, and whenever information is changed, the firm will provide the product sponsor with alternative contact information.

## **Critical Counter-parties**

The firm may execute transactions away from RBC and with other broker dealers, ECNs, and exchanges. Where possible, the firm will obtain a BCP from its critical counter-parties. Alternatively, if a BCP is not available, the firm will contact its critical counter-parties to determine their resumption time and if transactions will be completed during an SBD. If transactions cannot be completed, the firm will make alternative arrangements with its critical counter-parties or with its clearing firm to complete transactions as soon as possible.

## **Mission Critical Systems**

The firm considers “mission critical” to mean all systems and functions that are necessary for the operation of the firm in the conduct of its securities business. The loss of any of these critical systems

and functions would cause an immediate stoppage or significant impairment to the firm's core business. The firm recognizes that it has primary responsibility for maintaining its (i) business relationships with its customers, (ii) mission critical functions, and (iii) mission critical systems.

The firm's mission critical functions are as follows:

### **Order Taking**

The firm receives customer orders in the following manner:

- telephone
- on-line
- in-person visits by the customer
- via mail

During an SBD the firm will continue to receive customer orders using the primary methods listed above. If the SBD involves a disruption to a primary method, the firm will receive customer orders using the following secondary methods:

- cell phones assigned to registered representatives
- re-routing calls to an alternative telephone number or location
- fax
- providing customers with direct contact to clearing firm
- providing customers with an alternative mailing address and/or office location.

The firm will provide secondary communication instructions to customers via written notice at the time the account is opened. Such notice is mailed to customers upon request.

### **Order Entry**

The firm enters customer orders electronically, using RBC's order entry system. If an internal SBD or an external SBD (not involving the clearing firm) involves a disruption to the primary method, the firm will manually enter orders by creating an order ticket and sending the order to the clearing firm using the quickest secondary method available, which may include phone, fax, and/or email. Concurrently with implementing manual methods, the firm will install clearing firm software on a secondary computer (located on-site or offsite, depending on the nature of the internal SBD) and begin electronic order entry from the secondary computer.

If an external SBD involves the clearing firm, the firm expects service to be restored in accordance with the recovery and resumption time periods represented by the clearing firm to the firm (please see section "Mission Critical Business Partners").

The firm may also enter customer orders manually, using an order ticket and phoning the order to RBC. If an internal SBD or an external SBD (not involving the clearing firm) involves a disruption to this primary method, the firm will continue to create an order ticket and send the order to the clearing firm using the quickest secondary method available, which may include phones located off-site, cell phones assigned to registered representatives, fax, and/or email. Please see Schedule J for a listing of overnight couriers and messenger services.

If an external SBD involves the clearing firm, the firm expects service to be restored in accordance with the recovery and resumption time periods represented by the clearing firm to the firm (please see section "Mission Critical Business Partners").

If an external SBD disrupts U.S. mail delivery service, the firm will utilize the quickest secondary method available, which may include courier service, messenger service, or fax. Please see Schedule J for a listing of overnight couriers and messenger services.

Please see Schedule B for a listing of the firm's mission critical systems and Schedule C for a listing of mission critical office locations, identifying the mission critical functions conducted at each location and the mission critical systems utilized at each location.

### **Data Back-Up and Recovery**

The firm's mission critical books and records are maintained at the firm's main office at 205 W. Wacker Dr., Suite 610, Chicago, IL 60606. The firm maintains both hard copy and electronic books and records. Electronic records may also be maintained by the clearing firm, RBC, in which case such records are backed-up and maintained at redundant sites (please see Exhibit A for a description of clearing firm data back-up and recovery). Electronic records maintained by the firm are backed-up nightly on an electronic storage tape and a copy of the tape is maintained.

Duplicate copies of mission critical paper records are maintained offsite. Please see Schedule D for a list of those records identified by the firm as mission critical to its business and the location of backed-up records.

In the event of an internal or external SBD that causes the loss of the firm's electronic records, the firm will physically recover the storage media. In the event of an internal or external SBD that causes the loss of the firm's mission critical paper records, the firm will physically recover such records from the back-up site.

If the firm's primary site is inoperable, the firm will continue operations from an alternate physical location as provided in Schedule E.

The President is responsible for the maintenance of the firm's books and records.

### **Customer Access to Funds and Securities**

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, RBC. 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 Dustin Simonson or Mark Rohlik (Schedule A). 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.

### **Alternate Communication**

During times of normal operation, the firm regularly communicates with its clearing firm, product sponsors, customers, regulators, employees and critical business constituents/banks/counter-parties by:

- telephone
- email
- website
- fax
- U.S. mail
- in-person visits at the firm

In the event of an SBD, the firm will assess which means of communication are available to the firm to communicate with its clearing firm, customers, regulators, employees, and critical business constituents/banks/counter-parties and utilize the quickest means available, including overnight courier.

### **Customers**

The firm will notify customers at the time the account is opened, upon request that:

1. the clearing firm holds customer funds and securities; and
2. secondary communication methods available if an SBD disrupts customer's access to the firm's primary methods of communication.

### **Regulators and Regulatory Reporting**

The firm is a member of the Financial Industry Regulatory Authority (FINRA), the Securities and Exchange Commission (SEC) and the Municipal Securities Rulemaking Board (MSRB). The firm provides FINRA with primary and secondary emergency contact information via FINRA's Contact System. The firm reviews this information quarterly and updates this information upon any material changes. Please see Schedule F for a listing of the primary and secondary emergency contacts. In the event the firm executes this plan, the firm will immediately notify its FINRA District Office utilizing the quickest communication means available to the firm.

The firm currently files monthly electronic Focus Reports utilizing FINRA's filing platform and paper copies of annual audited financial statements utilizing U.S. mail or an overnight delivery service. In the event of an SBD occurring on or about a filing deadline, the Financial and Operations Principal will immediately contact FINRA, the SEC, and the appropriate state securities regulators to request a filing deadline extension and to determine which means of filing are still available to the firm. In the event that an SBD prevents the firm from communicating with regulators using primary methods, the firm will utilize the quickest communication means available. Please see Schedule G for regulator contact information.

### **Employees**

In the event of an SBD, the firm will employ a "call tree" so that senior management can quickly reach all mission critical employees. The firm's primary emergency contact, or in his/her absence, the secondary emergency contact, will invoke use of the call tree. Please see Schedule F, which identifies the firm's mission critical employees and assignment of calling responsibilities.

### **Critical Business Constituents, Banks, and Counter-Parties**

#### **a. Business Constituents**

The firm and/or its clearing firm and/or product sponsors maintain mission critical records. In the event of an internal or external SBD the firm will continue its business relationship in accordance with the process described above (please see sections "Communication" and "Mission Critical Business Partners").

A third-party vendor provides the firm's telephone system, a mission critical system. If an internal or external SBD interrupts the firm's business relationship with this vendor, the firm

will use cell phones until services are restored. Please see Schedule H for a list of business constituents.

b. Banks

The firm maintains a PAIB account at RBC. Please see Schedule H for information regarding the bank where the firm maintains its operating account(s). The firm does not currently rely on any bank or lender to fund its operating account or to provide financing to operate its business.

c. Counter-Parties

The firm may execute transactions away from its clearing firm and with other broker dealers, ECNs and exchanges.

## **Financial and Operational Assessments**

### **Financial**

In the event of an SBD, the Chief Financial Officer and Financial and Operation Principal will immediately determine the firm's net capital and assess the firm's credit risk taking into consideration, among other factors, the value and liquidity of the firm's investments, the ability of the firm to meet its obligations to counter-parties and the ability of the firm to continue to fund its operation. If it is determined that a net capital deficiency exists, the firm will immediately discontinue conducting a securities business until the deficiency is remedied and will utilize the quickest communication means available to (i) notify the SEC and FINRA by filing the appropriate notice; (ii) contact and instruct the clearing firm and/or product sponsor to provide customers with instructions and assistance on how customers may gain prompt access to their funds and securities; and (iii) request additional capital from owners and/or request financing from banks and/or other credit sources. Please see Schedule I for a listing of owners.

The firm will inform customers to directly contact RBC or the respective product sponsor for access to funds and/or securities in the event of an SBD by providing customers with written notice at the time of account opening. Such notice is mailed to customers upon request.

### **Operational**

Schedule C identifies mission critical records. In the event of an SBD, the firm will retrieve these records and communicate with customers, the clearing firm, product sponsors, and critical business constituents/banks/counter-parties in accordance with the process described above (please see sections "Data Back-Up Recovery," "Communication," and "Mission Critical Business Partners").

## **Annual Review**

The firm will review its BCP annually in conjunction with the main office review. In addition to this annual review, the firm will update this plan whenever material changes are made to its operations and whenever changes are made to its mission critical business partners, mission critical systems, mission critical functions, mission critical employees, mission critical office locations, alternate office locations, regulators, and critical business constituents/banks/counter-parties.

## **Disclosure of Business Continuity Planning**

The firm discloses its business continuity planning to customers at the time of account opening. Such information is mailed to customers upon request. A copy of the firm's Disclosure Statement is attached as Exhibit B.



I have approved this BCP as reasonably designed to enable the firm to meet its obligations to customers in the event of a SBD.

Signed: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

# SCHEDULE A

## MISSION CRITICAL BUSINESS PARTNERS

<b>Business Partner</b>	<b>Type</b>	<b>Primary Contact</b>	<b>Alternate Contact</b>
RBC Correspondent Services a division of RBC Capital Markets, LLC 60 South 6 <sup>th</sup> St Minneapolis, MN 55402  <a href="http://www.rbc-cs.com">www.rbc-cs.com</a>	Clearing Firm	Contact Name Dustin Simonson Relationship Manager  Phone 612-371-2862  Email dustin.simonson@rbc.com	Contact Name Mark Rohlik Operations Support  Phone 612-607-8220  Email <a href="mailto:mark.rohlik@rbc.com">mark.rohlik@rbc.com</a>

## SCHEDULE B

### MISSION CRITICAL SYSTEMS

<b>System</b>	<b>Users</b>
Firm's Computer Network System (daily transaction blotters and/or net capital computations only)	-all mission critical offices and mission critical employees
Clearing Firm Order Entry System	-all mission critical offices and mission critical employees
Telephone System, including phones, fax machines, and assigned cell phones	-all mission critical offices and mission critical employees
Electric Service	-all mission critical offices and mission critical employees

# SCHEDULE C

## MISSION CRITICAL OFFICE LOCATIONS

Each office location may be accessed by use of personal vehicle, public transportation, or foot.

<b>Office Location</b>	<b>Type of Office</b>	<b>Mission Critical Systems</b>	<b>Mission Critical Functions</b>
Address: 205 W. Wacker Drive Ste. 610 Chicago, IL 60606  Phone: (312 ) 376-4500	Main Office	Phone System Computer System Order Entry System Electric	Order Taking Order Entry
Address: 5412 Packard St Los Angeles, CA  Phone: (213) 347-9202	Branch Office		Order Taking Order Entry

## SCHEDULE D

### MISSION CRITICAL RECORDS

<b>Record</b>	<b>Back-up Method</b>	<b>Maintained by</b>	<b>Location</b>
Customer Account Records	Electronically	Clearing Firm	Undisclosed, redundant site.
Daily Transaction Blotter	Electronically	Clearing Firm	Undisclosed, redundant site.
Daily Transaction Blotter	Paper	Head Trader/Compliance Officer	Main Office
Net Capital Computations and supporting documents	Electronically Paper or Electronically	Firm FinOp	Main Office
Subscription Blotter	Paper or Electronically	President/Compliance Officer	Main Office
PPM Distribution List	Paper or Electronically	President	Main Office
Order Tickets	Paper or Electronically	Head Trader	Main Office
Subscription and Suitability Documents	Paper or Electronically	Product Sponsor	---

# SCHEDULE E

## ALTERNATE OFFICE LOCATIONS

<b>Primary Location</b>	<b>Type of Office</b>	<b>Alternate Location</b>
Address: 205 W. Wacker Drive Ste. 610 Chicago, IL 60606  Phone: (312) 376-4500	Main Office	Address: 5412 Packard St Los Angeles, CA  Phone: (213) 347-9202

# SCHEDULE F

## MISSION CRITICAL EMPLOYEES

Attached to this Schedule F is a calling list for each mission critical employee, including the call recipient's name and primary and secondary contact information. In the event an SBD occurs at a location other than the main office, the office location experiencing the SBD will contact its supervising office and the supervising office will contact the Compliance Officer. The call tree will be invoked only to the extent necessary to respond to the isolated SBD.

<b>Mission Critical Employee</b>	<b>Title</b>	<b>Call Recipients</b>
Curtis Spears	Primary Emergency Contact	-Chief Technology Officer -Secondary Emergency Contact -FinOp -FINRA Washington Office -SEC Washington Office -Clearing Firm -Banks -Insurance Carrier
Brian Lenart	Secondary Emergency Contact	-Primary Emergency Contact -OSJ Branch Supervisors -Assistant Compliance Officer -Non-OSJ Branch Supervisors supervised by main office -FINRA District Office

Caller's Name and Title: Curtis Spears, Primary Emergency Contact

Primary Contact Information: (312) 376-4500

Secondary Contact Information: (312) 925-2498

<b>Call Recipient</b>	<b>Primary Contact Information</b>	<b>Secondary Contact Information</b>
Brian Lenart	Office Number (708) 624-1982	Assigned Cell Number (312) 813-0318
Raymond McGaugh	Office Number (312) 376-4506	Assigned Cell Number (312) 296-3401



Caller's Name and Title: Brian Lenart, FinOp  
Primary Contact Information: (708) 624-1982  
Secondary Contact Information: (312) 813-0318

<b>Call Recipient</b>	<b>Primary Contact Information</b>	<b>Secondary Contact Information</b>
FINRA District Office	(312) 899-4400	Other Number ( )
David Ingevaldson	Office Number (312) 583-2117	Assigned Cell Number (312) 813-0318
	Office Number ( )	Home Number ( ) Assigned Cell Number ( ) Other Number ( )

<b>Call Recipient</b>	<b>Primary Contact Information</b>	<b>Secondary Contact Information</b>
FINRA Washington Office (only if Focus Report is due) (only if Annual Audit is due)	Office Number (301) 590-6500 (240) 386-5162	Other Number ( )
SEC Washington Office (only if Annual Audit is due)	Office Number (202-942-4150 )	Other Number ( )

Office Number  
( )

Home Number  
( )  
Assigned Cell Number  
( )  
Other Number  
( )

## SCHEDULE G

### REGULATOR CONTACT INFORMATION

<b>Regulator</b>	<b>Phone/Fax/Email</b>	<b>Overnight Address</b>
SEC (Annual Audit)	202-942-4150/202-942-9643	Division of Market Regulation 450 Fifth Street, NW Washington, DC 20549
FINRA (FOCUS Filings)	301-590-6500	9509 Key West Ave 3 <sup>rd</sup> Floor Rockville, MD 20850
Systems Support Department (Annual Audit)	240-386-5162	
SEC Midwest Regional Office	(312) 353-7390	175 W. Jackson Boulevard Suite 900 Chicago, IL 60604
FINRA – Chicago District Office	(312) 899-4400	55 W. Monroe Street Suite 2700 Chicago, IL 60603
Illinois Secretary of State Securities Dept	217-782-2256/217-524-2172 <a href="http://www.cyberdriveillinois.com">www.cyberdriveillinois.com</a>	Jefferson Terrace, #300A 300 W. Jefferson St. Springfield, IL 62702

## SCHEDULE H

### CRITICAL BUSINESS CONSTITUENTS, BANKS AND COUNTER-PARTIES

	<b>Type</b>	<b>Primary Contact</b>	<b>Alternate Contact</b>
RingCentral	Telephone and Internet System Business Constituent		
RBC Correspondent Services	Customer Records Business Constituent	Dustin Simonson Phone (612) 371-2862	Mark Rohlik Phone (612) 607-8220
Chase Bank	Operating Account Bank	Steve Lobo Phone (312) 732-1164	
RBC Correspondent Services	PAIB Account Broker Dealer	Dustin Simonson Phone (612) 371-2862	Mark Rohlik Phone (612) 607-8220
TBA	ECN Counter-Party		
TBA	BD Counter-Party		

# SCHEDULE I

## MEMBERS

<b>Member</b>	<b>Primary Contact Information</b>	<b>Secondary Contact Information</b>
Sean Poole 18111 Longwater Run Dr. Tampa, FL 33647	Office Number (312) 376-4506	Assigned Cell Number (813) 503-8483
Raymond McGaugh 1510 Park Ave River Forest, IL 60305	Office Number (312) 376-4506	Assigned Cell Number (312) 296-3401
Curtis Spears 1360 S Tremaine Ave Los Angeles, CA 90019	Office Number ( )	Assigned Cell Number (312) 925-2498
	Office Number ( )	Home Number ( )
		Other Number ( )

# SCHEDULE J

## OVERNIGHT COURIERS/MESSENGER SERVICES

<b>Vendor</b>	<b>Phone</b>	<b>Account Number</b>
DHL	1 800- CALLDHL	111962382
Advance Messenger	312-942-1970	4480
UPS	1-800-742-5877	R65269

# SCHEDULE K

## BCP LOCATIONS

Mission Critical Employee	Title	BCP Location	On-Site	Off-Site
Firm's copy	Electronic Copy	National Compliance (bd--a-m )/Andes Capital Group, LLC/District/Andes Business Continuity Plan.doc		x
Firm's copy	Paper Copy		x	
Curtis Spears	Primary Emergency Contact			x
Brian Lenart	Secondary Emergency Contact			x
Brian Lenart	Financial and Operations Principal			x

## EXHIBIT A

RBC Correspondent Services  
a division of  
RBC Capital Markets, LLC  
**EXECUTIVE SUMMARY**

RBC Correspondent Services  
a division of RBC Capital Markets, LLC **BUSINESS CONTINUITY PLANNING**

RBC is committed to providing reliable, trustworthy service that represents the best interests of our clients. The firm has developed a business continuity plan to protect our clients and employees in the event of an emergency or significant business disruption. The plan is designed to help prepare for securing employees' safety and firm property, making financial and operational assessments, promptly recovering and resuming operations, protecting the firm's books and records, and allowing our clients access to their funds and securities.

The business continuity plan considers various scenarios that range in severity from a firm- or building-only disruption to an emergency situation on a local or regional level. For example, in the event any RBC office locations are inaccessible, alternative locations are established and prepared to facilitate business operations. The firm has redundancies in place for its business-critical systems and believes that it can usually be able to resume business within the same day as the disruption. Our goal in all situations is to return to normal business conditions as soon as possible, with minimal impact on our clients and employees. Even in an extreme situation where continuing business may not be possible or practical, RBC has plans in place that provide clients with access to their funds.

RBC's business continuity plan is subject to change at any time without notice. However, notwithstanding the above, RBC does not guarantee that for every disaster or business disruption, such plans will be successfully implemented or that such plans will be sufficient and appropriate to avoid, deter or mitigate the disaster or business disruption.

Thank you and we appreciate your business



## EXHIBIT B

### BCP DISCLOSURE STATEMENT

March 28, 2015

The firm has created a Business Continuity Plan (BCP) that provides for the firm to continue client service within a reasonable amount of time, given the scope and severity of a significant business disruption (SBD).

The BCP anticipates responding to both internal and external SBDs. An internal SBD, such as the loss of our telephone system, affects only the firm. The firm will respond to internal SBDs by re-routing calls to secondary numbers, and/or relocating its primary office to a secondary location, and/or, recovering data from a back-up storage media and/or a back-up site. The firm expects to recover from an internal SBD within one hour.

An external SBD, such as a power outage or flood, affects multiple businesses and can be local, regional, national, or global. The firm's response to an external SBD relies more heavily on other organizations, such as the clearing firm and product sponsors. The firm expects to recover from an external SBD within six hours.

In the event a SBD prevents customers from contacting the firm by using the firm's primary phone number, fax number, or email address, customers may contact the firm by using the following secondary contact information:

secondary phone:	(312) 813-0318
secondary fax:	(708) 221-0409
secondary e-mail	david@bdlcc.com

If a SBD disrupts both the primary and secondary methods of contacting the firm, customers should contact RBC at (612) 607-8903 and/or product sponsors at the number provided on quarterly statements.

The clearing firm and/or product sponsors maintain customer accounts and can deliver funds and/or securities. In the event an SBD renders the firm unable to receive customer orders, the firm will instruct the clearing firm and/or product sponsors to provide customers with instructions and assistance on how customers can gain prompt access to their funds and securities. If the SBD disrupts the clearing firm's systems, customer orders and requests for funds could be delayed during the time period in which the clearing firm restores its operations and resumes accepting customer orders and completing existing orders. The clearing firm expects to resume accepting orders within 24 hours.

While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, the firm continually assesses and updates its BCP to mitigate all reasonable risk.

This disclosure is subject to modification.