



PRIVATE CLIENT SERVICES™

MEMBER FINRA, SIPC
A Registered Investment Advisor

2225 Lexington Road
Louisville, KY 40206
(502) 451-0600

Private Client Services Disaster Recovery & Business Continuity Plan

Revised 12/31/2018

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Private Client Services, LLC

Disaster Recovery and Business Continuity Plan

Introduction:

Private Client Services, LLC is a FINRA member firm and SEC Registered Investment Advisor. PCS conducts business as an introducing firm to Pershing, LLC and does not perform any type of clearing function for itself or others. PCS does direct business with product manufacturers such as mutual fund companies and insurance companies. PCS also conducts business with third party asset managers (“TPAMs”).

Private Client Services, LLC (hereinafter, “PCS”) recognizes its corporate responsibility to customers, employees and stakeholders to manage its business in a way as to be prepared for disruptions which from time to time occur due to unexpected events including natural disasters of both small and large proportion. Preparing for the unexpected is good business and facilitates the return to normalcy following such an event.

As part of its duty to clients, and in accordance to FINRA Rule 4370 (Business Continuity Plans and Contact Persons), PCS has adopted this Disaster Recovery and Business Continuity Plan (hereinafter, the “Plan”) to help provide for the firm’s recovery from an emergency or disaster and the resumption of business operations in as short a period of time as possible. These policies and procedures are, to the extent practicable, designed to address those specific types of disasters that PCS might reasonably face given its business and location. Private Client Services, LLC provides FINRA with the contact information for emergency persons and maintains this information with the regulator, updating it with any material changes.

PCS’ Disaster Recovery and Business Continuity Plan enables both PCS home office (OSJ) personnel and affiliated Registered Representatives and Investment Advisor Representatives to fulfill all responsibilities for managing client assets and conducting business in an effective manner in the event of Significant Business Disruption or qualifying situation.

Plan Approval, Location and Access

Ernest A. Sampson, CEO and Registered Principal, is responsible for approving the Business Continuity Plan and for conducting the required annual review of the Plan.

PCS maintains copies of the Plan, its annual reviews, and the changes which have periodically been made to it for inspection. An electronic summary of our Plan is posted on our website: www.pcsbd.net and a full electronic copy is maintained on our file server.

Additionally, a summary of the plan is provided to clients at the time of account opening and is available upon written request. In addition, the Plan has been distributed to our Emergency Contact Persons and Secondary Emergency Contact Personnel with the understanding that they will maintain the Plan off-site at their personal residences.

Finally, the Plan has been distributed to each home office employee with the understanding that they will maintain the Plan off-site at their personal residences.

Private Client Services' Policy on Significant Business Disruptions

Private Client Services' policy is to respond to any Significant Business Disruption ("SBD") by safeguarding employees' lives and firm property, making financial and operational assessments to determine the best course of action, quickly recovering and resuming operations, protecting all Firm books and records, and enabling our customers to maintain access to funds and securities.

Significant Business Disruption (SBD)

PCS has identified two types of SBDs: internal and external. The nature of the disruption determines whether the Business Continuity Plan is implemented in its entirety or on a partial basis.

Internal SBDs affect only PCS's ability to communicate and conduct business from our Home Office location. Examples of such a disruption include a fire or other significant damage to our building which may render the structure uninhabitable and diminish capabilities to operate from our primary location.

External SBDs prevent either the operation of the securities markets collectively or multiple businesses. Examples of such a disruption include terrorist attack or other wide-scale regional or national disruption. Firm response to an external SBD relies more heavily on outside organizational systems.

Emergency Contact Persons

Private Client Services, LLC has designated the following personnel as Emergency Contact Persons in the event of a Significant Business Disruption or qualifying situation:

Primary Contacts		
Ernest Sampson	CEO & Registered Principal	Cell # - 502-417-5856
Ryan Armock	Chief Operations Officer	Cell # - 920-205-6505
Mary Wescott	Chief Administrative Officer	Cell # - 502-744-0712
John Taylor-Jones	Chief Compliance Officer	Cell # - 502-554-8937

Emergency Contact information will be promptly updated, when necessary. Contact information is reviewed within 17 business days of the end of each calendar year and a written record of the review is maintained.

Ernest A. Sampson, Ryan Armock, Mary Wescott, and John Taylor-Jones have the authority to execute the Plan. In the event the Plan is activated, Emergency Contact Persons will designate others to assist in the event of an emergency as needed.

The Emergency Contact Persons will oversee the entire recovery process from any identified SBD; these individuals are the first ones responsible for taking action in the event of a disaster. This group will evaluate the SBD and will determine the necessary steps to get Private Client Services back to business as usual.

Responsibilities of Emergency Contact Persons:

- Set the Business Continuity Plan into motion after an SBD has been identified.
- Determine the magnitude and class of the incident.
- Determine what systems and processes have been affected by the SBD.
- Identify a communication plan to the appropriate regulators, vendors, employees, registered representatives, clients, etc.
- Determine the first steps to be taken to implement the continuity plan.
- Get the secondary site ready to support restoration of business activities.
- Ensure the secondary site is operational and secure.
- Create a detailed report of all steps undertaken during the SBD.
- Determine when the SBD is over and normal operations can resume.

Home Office Location of Private Client Services, LLC

Private Client Services, LLC corporate headquarters (Home Office) is located at 2225 Lexington Road, Louisville, Kentucky 40206. The main phone numbers are 502-451-0600 and 800-966-9347. Our fax number is 502-473-1721 and our website is www.pcsbd.net. In April of 2018, as an essential part of the Disaster Recovery and Business Continuity Plan, PCS opened an Operations and Services Center located in Appleton Wisconsin.

Approximately 40 individuals including home office employees, registered representatives and investment advisor representatives work from the Louisville location and 15 Appleton Operations and Services Center employees work in the Appleton location. The Home Office and Appleton locations are each identified as being operationally critical locations. PCS conducts business with Pershing, LLC (our clearing firm), customers, product manufacturers, TPAMs, RRs, IARs, regulatory agencies, and a variety of vendors including bank, technology and communication companies from this location.

Communications with our business partners is critical; if PCS in an unlikely event is unable to operate simultaneously from both locations, alternative work sites will be designated. If one site is affected and employee transportation to the other site is necessary but also adversely affected by a Significant Business Disruption, communications will be conducted by land line phone, cell phone or e-mail to the extent each method is available. The designated Emergency Contact Persons will identify the most expedient remaining means of communication and will notify employees of the alternative communication system to be used.

Appleton Wisconsin Operations and Services Center Location

Private Client Services has designated the Appleton Operations and Services Center as the primary alternate location from which to restore normal business operations for the Louisville Home Office and visa-versa for the Appleton facility. If the expected duration of the disruption or inaccessibility of PCS's offices is longer than a month, Ernest Sampson will determine more permanent alternative locations. On a temporary basis if both locations are simultaneously determined to be disaster locations and unavailable for use, the address below has been designated as a temporary command center to reestablish business functionality.

The present locations have sufficient technology equipment and capacity, as well as parking space for employee vehicles and kitchen and bathroom facilities.

Dependent on job responsibilities and technology availability, some employees may work remotely for a specified time period at his/her residence. Due to PCS's size of essential staff, this determination will be made and communicated to each employee at the appropriate time based on the particular circumstances.

Address:

5813 Glen Park Road Louisville, KY 40222

Phone # 502-417-5856

Private Client Services LLC's Clearing Firm

PCS clears through Pershing, LLC a subsidiary of Bank of New York Mellon. Private Client Services is an introducing firm and does not perform any type of clearing function for itself or others. Further, PCS does not hold customer funds or securities. PCS does accept and enter orders with all transactions sent to Pershing, LLC for execution.

Key Pershing Contacts:

- Paul Lewandowski
Office: 201-413-2223
Fax: 866-355-5570
Email: plewandowski@pershing.com
- Pershing Trade Desk 1-800-225-4830
- DBS 1-800-635-9881

Pershing, LLC is responsible for the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Pershing, LLC maintains a business continuity plan and the capacity to execute that plan. In the event our clearing firm executes its plan, it represents that it will notify us of such execution. If PCS reasonably determines that our 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 clearing services, Pershing represents that it will assist us in seeking services from an alternative source.

Pershing, LLC has 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 every periodically.

Customer Access to Funds and Securities

Custody of customers' funds or securities is maintained at Pershing, LLC, product manufacturers and TPAMs.

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, product manufacturers and TPAMs on their behalf, and;
- If our website is available, PCS will post instructions on how customers may access their funds and securities by contacting these parties directly.

In the event a Significant Business Disruption would require SIPC liquidation of PCS' business, designated personnel will work with the SIPC-appointed trustee to wind down PCS Operations and transfer client's funds & securities.

Data Back-Up and Recovery (Hard and Electronic)

Private Client Services, LLC maintains its primary hard copy books and records at its home office location and stores all records off-site electronically on via the hosted cloud-based solution, Microsoft Office 365, business and enterprise edition. All data on PCS hard drives are backed up daily and stored electronically.

Additionally, Pershing, LLC maintains a complete list of all customer names, addresses, phone numbers, etc. This includes customer data on business held at Pershing, LLC, as well as business held with other product manufacturers and TPAMs. PCS evidences Pershing and Peak 10 Data Solutions' maintenance of these records and their compliance with regulatory standards.

In the event PCS hard copy records are damaged or inaccessible due to a SBD following an emergency, it may be possible to safely retrieve and transport PCS's server and hardware systems containing all electronically-stored data to the alternate site for restoration of business operations. In the initial stages of the disruption, Ernest Sampson will make the determination regarding the physical possibility and practicality of this course of action or whether a complete back-up to the alternate system is warranted.

PCS maintains appropriate equipment at the alternative site including computers, fax, and duplicating and scanning machines, as well as emergency generators in order to meet business needs on an interim basis. Additionally, all PCS Home Office personnel are being outfitted with laptop computers through a phased-integration approach for portability and business-sustainability purposes.

The Emergency Contact Team is responsible for ensuring that sufficient computer and laptop-related supplies including cables, wireless cards, and mice are available and ready for use if needed, as well as for ensuring that all spare technology has the appropriate software and patches installed.

The Emergency Contact Team has additional technology support available through a contracted external technology vendor, Advanced Business Solutions.

Contact Information for Advanced Business Solutions:

Advanced Business Solutions
2908 Brownsboro Road
Louisville, KY 40206
502-896-2557

Financial and Operational Assessments

In the event of an SBD, Emergency Contact Personnel will immediately identify what means are available to communicate with customers, employees, critical business constituents, bank, critical counter-parties, representatives, law enforcement personnel, disaster first responders and regulators.

Means of communication may include internet, telephone voice mail, secure email, cell phones, land lines, and any other medium as appropriate. In addition, we will retrieve our key activity records as described in this Plan.

The Financial and Operational Assessment may be conducted by Ernest A. Sampson, Mary Wescott, or John Taylor-Jones singularly or jointly as the SBD determines.

Financial and Credit Risk

In the event of a SBD, PCS will determine the value and liquidity of its investments and other assets to evaluate the Firm's ability to continue to fund our operations and remain in capital compliance.

PCS will contact Pershing, the banks and any other affected parties to apprise them of the Firm's financial situation if warranted. In the event of a capital deficiency that cannot be remediated, PCS will file any required notifications with appropriate regulators.

Banks

PCS has verified that our banks may have the capacity to continue to provide banking services to PCS and extend a line of credit in the event of an internal or external SBD. PCS maintains its operating account at JP Morgan Chase located at: Jefferson Street, Louisville, Kentucky 40202. Contact Person: Chris Carter 502-566-3948 Christopher.a.carter@chase.com. The account for NSCC deposits is with Community Bank.

The Emergency Contact Team is responsible for contacting PCS' banking partners to obtain any materials such as checks or bank books that could need to be replaced as a result of an SBD. They are also responsible for communications with creditors to arrange extensions of scheduled payments if needed.

PCS has steps in place to ensure there is sufficient cash on-hand or accessible to handle small-scale expenses caused by an SBD and has identified Stock Yard Bank and Trust as the financial institution to go to in the event sufficient credit would be unavailable or accessible to deal with large-scale expenses caused by a disaster.

Private Client Services has outsourced its payroll processing to ensure that payroll occurs and employees are paid as normally as possible, where possible.

Occurrence/Anticipation of a Significant Business Disruption

Emergency Occurring During Office Hours:

In the event of an emergency during office hours, an assessment will be made as to the need to involve law enforcement or emergency first responders, and if so, an Emergency Contact person will be responsible for calling 911. (See Example 1 for Emergency Action Plan Checklist)

The next appropriate course of action will depend on the nature of the emergency. If evacuation of the building(s) is necessary, personnel will be instructed to gather their belongings if time safely permits and promptly exit the building. Personnel should, at all times, follow the instructions of emergency responders. If a building evacuation is necessary, all personnel are to meet at the designated area indicated below if it is safe to do so.

Designated Louisville Meeting Area: 5813 Glen Park Road Louisville, Kentucky 40222

Designated Appleton Meeting Area: 1160 West Cecil Street Neenah, Wisconsin 54956

After-Business Hours Disruption: Discovery and Notification of Personnel

In the event of an SBD occurring after business hours, Emergency Contact Persons will identify a plan of action and contact each person identified on the PCS Organizational Chart with instructions on how PCS plans to handle the SBD.

Responsibilities in the event of an SBD

Emergency Contact Persons are responsible for the following during a SBD:

- Designating and arranging for the alternative physical business location in the event of a SBD for mission critical persons to meet and to continue business and or to coordinate the repair of the home office facilities to make them mission critical prepared and functional.
- Determining and assessing back-up systems and/or recovery plans for key data and coordinate this with our technology vendor, Advanced Business Solutions or other IT professionals as needed.
- Assessing and determining the business equipment and technology resource needs of the alternative physical business location and arrange for them
- Determining which vendors and mission critical service providers need to be contacted and will arrange for their contact.
- Developing the BCP, conducting periodic and actual testing and training of mission critical personnel and therefore will assess the execution of the Plan and determine if personnel are fulfilling their responsibilities and if not take corrective actions to ensure compliance with the BCP.
- Documenting computer back-up procedures, i.e., frequency, procedure, person(s) responsible, for designating back-up storage location(s) and persons responsible to maintain back-up data in separate locations.

- Establishing back-up telephone/communication system for clients, personnel and others to contact the firm and for the firm to contact clients.
 - Assess or participate in the assessment of any physical damage to the primary facility (Home Office location) and ensure that measures are taken to prevent further damage, if applicable.
 - Work with insurance company in the event of damage, destruction or losses if applicable.
 - Work with the technology vendor(s) to assess damage specific to network infrastructure and for provisioning data and voice network connectivity and any telephone connections if needed.
 - Prioritize the recovery of services in the manner and order that has the least business impact if multiple network services are impacted.
 - Ensure that network services work at the alternate worksite location.
 - Maintain lists of all essential supplies that may be required in the event of an SBD.

Handling a Significant Business Disruption **Sample Timeline of Tasks and Potential Actions**

Throughout any emergency and business disruption, PCS reminds each employee to be mindful of the Firm's duty to its clients both when evaluating the situation and when determining an appropriate course of action.

0 – 2 hours: Discovery and assessment

- Did the SBD occur during business hours and require emergency personnel?
 - If yes, call 911
- Is evacuation necessary? Does remaining in the building pose a threat to the safety of employees?
 - If, yes, evacuate building and meet at safe, designated location outside building
ALWAYS FOLLOW INSTRUCTIONS OF EMERGENCY PERSONNEL
 - If safety permits, secure all confidential client information prior to evacuation.
 - Conduct a roll call at designated location to ensure the health and safety of all employees.
- Attempt to assess estimated amount of time before possible resumption on-site. If more than a day, determine whether or not to initiate a set-up of alternate site.
- If safety does not demand evacuation of building, can normal operations resume?
 - If the disruption does not permit the resumption of normal business activities, attempt to assess estimated amount of time before possible resumption on-site.
 - If less than a day, determine whether or not to dismiss employees for a number of hours.
 - If more than a day, determine whether or not to initiate a set-up of the firm's alternate location.
- If disruption results from an emergency at a key third-party vendor assess amount of time until restoration by vendor, formulate a work around or determine whether an alternative vendor may fill the gap.
 - If no, anyone initially discovering situation must notify Emergency Contact Persons immediately.
 - Does situation preclude safe, normal business operations?
 - If yes, execute call tree. Inform employees of situation, direct them to avoid principal office and to await further instruction.
 - If no, attempt to quickly assess estimated amount of time before possible resumption on-site and execute call tree to inform employees of situation and where and when to reconvene.

2 – 8 hours into SBD:

- Initiate Emergency Recovery/Contact Critical Vendors

- Assess which staff will meet at alternative location and which will work from home. Set a time the following day for a conference call, if possible, or otherwise require each staff member to call in at a set time. Notify staff accordingly.
- Begin to compile list of data lost or otherwise inaccessible.
- If possible, begin to salvage data and files from principal office or make plans for such salvage as soon as safety and the authorities permit.
 - If necessary, initiate recovery of backed-up data to alternate systems.
- Begin to capture expenses associated with disruption.
 - If necessary, notify insurance carriers of situation.
- Arrange with authorities and/or landlord to participate in salvage operations and secure confidential information ASAP.
- Notify and brief key vendors on situation, including Pershing, LLC.
 - Request Pershing, LLC send (fax email or other remaining means) information regarding client issues and transactions.
- If possible and if estimated time of disruption calls for it, consider recording emergency voicemail to provide basic information regarding situation to clients and vendors calling in.
 - Contact Telephone Company to redirect all calls made to firm's main number to an identified phone number.
- Determine if and what client communication is necessary.
- If possible and if estimated time of disruption calls for it, contact web-host to post a notice to clients on the firm's home page informing them of the situation, how to contact PCS and any other prudent information.
- If possible and if estimated time of disruption calls for it, consider sending an email to all necessary stakeholder informing them of situation and other important information. Senior management will determine the best communication method available.
- Verify that restoration of back-up data was successful and systems are fully operational. If necessary, contact IT vendors for priority assistance. (If disruption is not localized, priority assistance may not be feasible.
Conduct a reconciliation of accounts to verify that holdings match broker-dealer information.
- Assess damage and estimated time until principal office will be accessible and operational. If estimate is more than a month, begin to formulate plan for new principal office or a more-permanent alternate location.
- CCO to review compliance checklist to determine whether any critical filings are required in the near future.
- CCO notify regulators to inform them of situation and new operating location, if necessary.

Communications Methods

Communications with Clients:

In the event of an SBD, PCS will assess which means of communication are still available for use and identify the best available option given the particular situation.

Communications to clients may include anticipated impact on service and orders, any impact on the security of client information, and an anticipated timeline for restoration of normal business practices.

Communications with Employees:

In the event of an SBD, Emergency Contact Persons or their designees will assess which means of communication are still available for use (written or oral) and identify the best available option given the particular situation. PCS will employ a call tree (See Addendum 1) so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers.

Communications to employees may include whether it is safe for them to come into the office, where they should go if they cannot come to the office, which services are available to them and work expectations during the SBD.

Communications with Vendors:

In the event of an SBD, PCS will assess which means of communication are still available for use and identify the best available option given the particular situation.

Communications to vendors may include adjustments to service requirements, adjustments to delivery locations, adjustments to contact information, and anticipated timelines for restoration of normal business practices.

Vendors identified as being crucial to daily operations will be made aware of an SBD first; all other vendors will be contacted as needed following notification to crucial vendors.

Communications with Regulators:

PCS is a member of FINRA and is an SEC Registered Investment Advisor. PCS is also regulated by 50 state agencies and or departments of insurance and securities. In the event of an SBD, PCS will assess which means of communication are still available for use and identify the best available option given the particular situation.

Regulatory Reporting: PCS files reports with regulators via hard copies in U.S. mail, as well as via electronic means using fax and email. In the event of an SBD, PCS will work with the SEC, FINRA and other regulators to determine what filing methods are still available and utilize the means closest in speed and form (written or oral) to our previous filing method. In the event that

PCS cannot contact the regulators, PCS will continue to file required reports using the communication means available.

FINRA

Contact: Daniel Opalka
55 W. Monroe Street, Chicago, Illinois 60603
312-899-4375

Securities and Exchange Commission:

175 W. Jackson Blvd. Suite 900
Chicago, IL 60604

Telecommunications Disruption:

In the event that local “land-line” telephone service is disrupted, employees are encouraged to use their personal cellular phones to conduct business until service is restored.

Critical Business Constituents and Vendors

Business Constituents:

As part of PCS' vendor due diligence program, PCS has examined each critical business constituent (businesses with which PCS has an ongoing commercial relationship in support of operating activities) and determined the extent to which PCS can continue a business relationship with them in light of an internal or external SBD. PCS will establish alternative arrangements if a business constituent can no longer provide the required goods or services due to a SBD.

Disruption in Services of Critical Third-Party Vendor:

In the event of a disruption in the services provided by a critical service provider, Emergency Contact Persons will attempt to contact the vendor to determine the nature of the problem and an estimate of the restoration of services.

If the vendor cannot be reached and services cannot be restored, Emergency Contact Persons will determine an appropriate "work-around" solution. PCS may also consider referencing the vendor's own recovery plan on file with PCS to attempt to determine likely causes of the disruption and the vendor's own estimate of the restoration of services therefrom. If continued efforts to contact the vendor and/or to restore services are unsuccessful, consider contacting a back-up or replacement vendor.

Suppliers and Vendors

External IT Technical Support

- Advanced Business Solutions
2908 Brownsboro Road
Suite 206
Louisville, KY 40206
(502) 896-2557
Point of Contact: Steven Camp or Donnie Guess
scamp@advancedbusinesssolutions.com
dguess@advancedbusinesssolutions.com
service@absithelp.com

Data Back-up & Recovery:

- PEAK 10, (location of servers)
733 Barret Avenue
Louisville, KY 40204
(502) 315-6015
(502) 315-6020 Fax
Point of Contact(s):
David Martin, Account Manager, (502) 315-6011, cell phone (502) 417-9673
David.Martin@peak10.com
Chris Simmons, Managed Services Engineer, (502) 315-8253 Mobile: (502) 403-5122
chris.simmons@peak10.com
For immediate assistance call PEAK 10 Support, 502-315-6000 or 1-866-732-5836
(National)

Internet Providers:

- Time Warner Communications
10168 Linn Station Rd # 220
Louisville, KY 40223
Circuit ID # LSVQKYDB
1-866-286-3938, Tech Support,
(502) 409-4168, Local Louisville Office
- Spectrum Enterprises – Wisconsin
Carter Polsgrove – Service Location
#082755001 Account # 0827554901
1-877-892-4662

Local Phone Companies:

- Windstream Communications
1301 Clear Springs Trace
Louisville, KY 40223
(800) 843-9214, Tech Support
(502) 400-4315, Local Louisville Office
- Northern Telephone & Data
P.O. Box 3465 Oshkosh WI 54903
Account # 0389005513
1-800-709-1818
Appleton Wisconsin Location

Other Miscellaneous Vendors:

- Website Hosting: Emerald Support www.emeraldsupport.com
- Payroll: Rodefer Moss, CPAs 812-945-5236
- Benefits Providers:
 - ✓ Humana: 866-427-7478
 - ✓ Guardian 800-627-4200

Service Vendors:

- Service type: Cleaning Service
Company Name: Vanguard Cleaning Systems of Louisville
Contact: Craig Uhl
Address: 1230 Liberty Bank Lane, Suite 110, Louisville, KY
Phone: 502-855-8500
Cleaning Person: Okbay Ghebremeskel
Phone: Cell – 510-282-4100
Pfefferle Companies
200 E. Washington St. 2A
Appleton, Wis.
1-920-560-5013
Lisa Fulkner
- Service type: Office Supplies
Company name: Staples
Contact: Nora Flores
Address: 41541 11 Mile Rd., Novi, MI 48375
Email: Nora.Flores@staples.com
Phone: 800-693-9900 ext. 465
- Service type: Ink Supplies
Company name: 4 Ink Now
Contact: Ken Krudelbeck
Email: KenK@4inknow.com
Phone: 513-3176158
- Service type: Phone System Repair
Company name: Access Voice and Data Solutions
Contact: Erin Watson
Address: 1441 Lincoln Ave, Louisville, KY 40213-1836
Email: service@adcky.com
Phone: 502-367-1881
Fax: 502-368-4132
- Service type: Printing Service
Company name: Allegra
Contact: Susan Schmidt
Address: 8307 Preston Hwy, Louisville, KY 40219
Email: SusanS@allegralouisville.com

Phone: 502-964-0973

- Service type: Banking

Company name: Chase Bank

Contact: Rick White

Address: 443 Spring Street, Jeffersonville, IN 47130

Email: rick.f.white@chase.com

Phone: 812-941-6314

Fax: 502-694-1203

Company name: Community Bank

Phone: 1-866-764-8638 (Online Banking)

- Service type: Shipping

Company name: FedEx (our account number 3552-6702-4)

Address: P.O. Box 371461, Pittsburgh, PA 15250-7461

Phone: 800-622-1147

Fax: 800-548-3020

- Service type: Meter Mail

Company name: Scot Mailing

Address: 11461 Blankenbaker Access Dr, Suite 103, Louisville, KY 40299

Email: sales@scotmailing.com

Phone: 502-267-4080

Fax: 502-267-0307

- Service type: Shredding and Offsite Storage

Company name: Underground Vault & Storage

Contact: Lois Hermann

Address: 1841 Taylor Ave., Louisville, KY 40213

Email: Lois.Hermann@undroundvaults.com

Phone: 502-451-4570 x102

- Service type: Commissions

Company Name: Artisan (Maestro/Repertoire)

Contact: Carol Haynes

Address: 7676 Hazard Center Drive, Ste 1540 San Diego, CA 92108

Phone: 619-725-1350

Fax: 619-725-1355

- Service Type: Retail Communication Review and Archive

Company Name: MarketingPro, Inc.

Contact: Jennifer French / Janet Kerkow
Address: 12395 World Trade Drive, Ste 200, San Diego, CA 92128
Phone: Jennifer (949) 265-0906
Janet (949) 265-0922

- Service Type: Email Review and Archive
Company Name: Global Relay
Contact: Marco Rizzo
Address: 220 Cambie Street, 2nd Floor, Vancouver, BC V6B 2M9
Phone: 866-484-6630
- Service Type: Continuing Education and Compliance Archive
Company Name: QuestCE
Contact: Kate Stockland
Address: 10100 W. Innovation Drive, Suite 200, Milwaukee, WI 53226
Phone: (414) 375-3413
Fax: (414) 375-3449
- Company Name: NSCC/DTCC
Contact: variable
Address: 18301 Bermuda Green Drive, Tampa, FL 33647
Phone: 813-470-1810
- Company Name: DST
Contact: Kim Jones
Address: 1055 Broadway, Kansas City, MO 64105
Phone: 1-800-214-2101
Additional Phone: 816-435-1551
Email: kjones1@dstsystems.com
- Service type: Landscaping
Company Name: Mitchell Mowing
Contact: Will Mitchell
Phone: 502-554-2543
Email: MitchellMowingllc@gmail.com

We have also identified the following as a possible provider of services in the event of an emergency: Technology Consulting Incorporated 140 Whittenham Parkway, Louisville, Kentucky 40222 Attn: Ken Wicker CEO 502-394-9353

Disclosure of Business Continuity Plan

This summary of Private Client Services' written BCP, known as a disclosure statement, is provided to clients at account opening and is posted on the website at www.pcsbd.net. It is also available to be mailed to customers upon request:

Private Client Services, LLC's Business Continuity Plan is intended to ensure the safety of the company's associates and the resumption of critical operations and services in the event of an emergency such as fire; power or communication blackouts; natural or man-made disaster; foreign and domestic terrorism; and civil disturbance.

The timeframe for resuming critical business operations may vary based on the nature and severity of the emergency.

Private Client Services, LLC recognizes the importance of maintaining viable emergency response, resumption, recovery and restoration strategies. It is the policy of Private Client Services, LLC, and all affiliated organizations, to maintain a viable Business Continuity Plan.

In support of this policy, procedures are in place to:

- Relocate critical business operations to established recovery facilities.
- Reroute and activate customer service phone lines.
- Process all customer transactional requests.
- Quickly restore communications with business constituents, banks and regulatory agencies.
- Contact all home office associates and sales representatives.
- Quickly restore all critical company data and systems.

The Business Continuity Plan is reviewed annually by a member of senior management of Private Client Services, LLC.

Private Client Services, LLC exercises its Business Continuity Plan at least once per year, or at a greater frequency as determined by Senior Management. Results of each test, or exercise, are reviewed by Senior Management.

It is the policy of Private Client Services, LLC to continually improve and refine the Business Continuity Plan through the aggressive testing of business continuity procedures and processes, and by leveraging advances in technology.

Therefore, the plan is subject to modification, at which time an updated summary will be promptly posted on our Web site. Alternatively, customers may obtain a summary by requesting a written copy by mail.

Updates and Annual Review

PCS updates its business continuity plan whenever there is a material change to operations, structure, business or location or to those of its clearing firm.

In addition, PCS will review this BCP annually and include it as part of the annual meeting with the Firm's board of directors, evidencing its review and approval beginning 2013, to modify it for any changes in our operations, structure, business or location or those of our clearing firm.

Training, Testing, Distribution and Record-keeping of the Plan:

Each Private Client Services employee will receive a copy of the Plan and is required to sign an acknowledgement that he/she has read and understands the Plan. Employees are responsible for keeping a current copy of the plan at their home address. Copies of the plan acknowledgements are kept in the Firm's books and records.

The Plan will be reviewed at least annually with home office employees at staff meetings. Minutes of these meetings will be kept and attendance by all employees is mandatory. If an employee has any questions regarding the Plan or his/her role in the event of an emergency, he/she is encouraged to ask an identified Emergency Contact Person for clarification. It is imperative that all personnel are familiar with the policies and procedures of the Plan and have a thorough understanding of his/her responsibilities in the event of an emergency.

Ernest Sampson will, on at least an annual basis, test the Plan. Such tests may be as complex as running a simulation of an actual disaster, including the restoration of data to alternate systems, or as basic as testing the employee call tree.

Typically, but not always, testing will be conducted after hours to minimize disruption of normal business operations. In order to gain realistic results that may be used to revise and optimize the effectiveness of the Plan in the event of a real emergency, not all tests will be announced ahead of time to all employees.

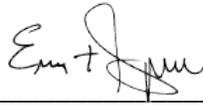
Test results will be evaluated and documented by Ernest Sampson and a determination of any weaknesses exposed by the test will be made at that time. The Plan will be revised accordingly to fill gaps discovered during testing. The Plan may also be revised pursuant to reviews and the issuance of regulatory guidance.

Changes in business operations, contracts and contacts, including new employees, new vendors or new addresses for existing employees or vendors, etc. will be reflected in the Plan and updated at least annually.

Ernest Sampson will be responsible for ensuring that the Plan is updated periodically and as required by any major changes. Changing the date of the Plan document will indicate any such revision. Any revision to the Plan will be distributed to all employees and **each employee will be required to provide a new, signed acknowledgement form.**

Senior Manager Approval

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

Signed:  _____

Title: CEO

Date: 1-4-2019