2nd Quarter 2013 Results Summary

The 2nd quarter of 2013 proved to be an excellent quarter for our Associates as record levels of sales were obtained which has helped build upon our year to date record sales results. Private Client Services, LLC appreciates the fine work our Associates and their support personnel are doing which is reflected in their success this year. Our Firm has enjoyed satisfactory net profits year to date and as a result has made significant investments in the further expansion of our business from a home office personnel and technology perspective during the first six months of 2013.

Technology Initiatives

The Home Office staff has been busy working on a number of projects involving technology enhancements such as our new back office business processing system. We plan to deploy its use early in the 4th quarter, providing Associates the ability to better manage the business. PCS has strengthened our data security by investing in technology improvements in both hardware and software.

Earlier this year, PCS contracted with a fiber optics provider and the installation of fiber to our Home Office and our off site data center is nearly complete. This technology will greatly enhance our data security and the speed of data delivery to our Home Office and expand the capabilities of all Associates to more quickly conduct business over the internet with our firm.

During the 2nd quarter, our firm completed an initial update to our <u>WWW.PCSBD.NET</u> website and has begun work on additional enhancements to refresh and expand its' look and functionality. PCS is expanding our advisor workstation technology, and has begun developmental work on an advisor portal to better accommodate a single sign in workstation for our advisors to utilize.

PCS Conference 2014

Pershing Financial Solutions Conference- Insite 2013 was held June 6-7 at the Westin Diplomat in Hollywood Florida. Private Client Services, LLC held a company dinner for those in attendance from our firm at this year's conference and announced formal plans to piggyback on this leading financial services industry conference in the future years. The 2014 PCS Conference will begin immediately following the Insite 2014 scheduled for June 4-6, 2014. The PCS Conference will primarily focus on practice management and business development.

Home Office Staffing

Private Client Services, LLC has been expanding and upgrading our home office personnel with highly qualified and experienced financial services personnel.

• Mary Wescott- PCS Operations

Mary brings many years of experience having worked in the compliance and operations departments at Hilliard Lyons, a regional wire-house broker-dealer. She has been working on updating our operations manual and policies and procedures which should increase the efficiency of application processing for our Associates.

• Chuck McCurdy, CFA- PCS Investment Advisor

Chuck is a seasoned investment professional having co-founded a \$2.7 billion money management firm. Chuck is working on reviewing all existing PCS RIA business including our proprietary AAA "Asset Allocation Accounts" and TPAM "Third Party Asset Managers" accounts.

• Kevin Collins- Home Office Managing Principal

Kevin is a Registered Principal (Series 24) and has many years of leadership responsibilities at a variety of well-known financial services firms. Kevin is working in the Home Office supervising the activities of the Associates working in or assigned to Kentucky Financial Group, Inc., the Home Office OSJ (Office of Supervisory Jurisdiction). Kevin has established positive relationships with those Associates and is also working on this year's PCS Golf Outing tentatively scheduled for late September / early October.

• Kim Givans- Compensation/ Commissions

Kim brings a great deal of experience to our firm having worked for years with PNC Bank in their accounting department. Kim has assumed an important role within PCS and has successfully mastered our current iNautix commission processing system. Kim will be working on the back office system project installation during the coming weeks and has trained Alex Dutton to assist her while simultaneously processing commissions through iNautix and testing the new system.

• Ryan Hixon- Business Development

Ryan was previously the Chief Operations Officer for two West coast securities firms and has extensive knowledge in operational efficiencies and technology. Ryan has been extremely busy on a variety of Home Office projects including the onboarding project, multiple website enhancements, new technology and marketing tools for our Associates, and recruiting.

• Mary Odle- Manager Enterprise Initiatives

Mary Brings a wealth of knowledge to our firm having held executive positions at other firms and has extensive knowledge in human resources. Mary is working diligently on our on-boarding processes to coordinate the orderly transition of new Associates to our firm, our 2014 PCS Conference in Hollywood Florida, and licensing and registration.

In addition, the firm is especially pleased that Alex Dutton has joined the firm having recently graduated with a finance degree from the University of Kentucky. Alex is working on multiple projects in the Home Office including operations, compliance, sales and marketing.

Recruiting

Private Client Services, LLC has recently received commitments from several Registered Representatives and Investment Advisor Representatives throughout the country including the Washington D.C. / Maryland and Philadelphia areas. PCS and these advisors are presently in the process of their on-boarding. Groups in Florida, Utah, Idaho and Washington State are also in various stages of discussions with PCS in addition to local prospective Associates.

PCS welcomes recommendations from current Associates and has been working extensively on our onboarding process with the help of Mary Odle and Mary Wescott to facilitate further growth. We are excited about our continued growth and expansion which is leading to new opportunities with referrals from new Associates joining the firm. Our primary focus continues to be with seasoned and experienced

financial advisors with a strong client base, no regulatory or customer complaint history and who demonstrate a commitment to our profession and their clients.

Private Client Services, LLC has a unique story having been the largest OSJ in Kentucky and largest OSJ nationally for our previous broker dealer prior to PCS choosing to pursue FINRA membership as a broker dealer in 2008-2009. In 2010, PCS became the 2nd largest broker dealer domiciled in Kentucky and the states' largest independent broker dealer. Our firm has a clean regulatory history, a firm-wide commitment to best practices from a regulatory prospective / conducting business, has avoided high risk investment products promotions and has a solid balance sheet with no debt and exceeds net capital above that required from regulators.

Business Outlook

PCS is optimistic about the long term growth and viability of our firm and looks forward to the next 10-15 years of unprecedented business opportunity with the convergence of the baby boom generation retirement escalation, multi-generational wealth transfers occurring, and consolidation of financial services firms which has been occurring during the past 20 years leaving a reduction in the number of financial advisors available for the public to turn to for financial advice at a critical time in their lifetime.

The disillusionment of the public with large Wall Street firms and banks "too big to fail" during the financial debacle these past few years creates exciting new opportunities for advisors affiliated with a truly independent broker dealer such as Private Client Services, LLC.

Our firm has certainty of purpose for our advisors. Private Client Services, LLC views this as the perfect creation of business expansion probabilities. Private Client Services, LLC is committed to excellence, providing a robust platform of technology and viable business services to our advisors, has a proven history of fulfilling promises made to advisors, and truly believes the independent business model for advisors is what most prospective clients desire today.

It's an exciting time for our firm, employees and Associates.

Ernest A. Sampson Chief Executive Officer

Operations Update 2nd Quarter 2013

Reminders

- Notification of Fee Changes from Pershing
 - Effective August 1, 2013, Pershing is increasing the termination fee on retirement accounts from \$75 to \$95.
 - > Also effective, August 1^{st} , the outgoing account transfer fee is increasing to \$95.
- Pershing Statement Enhancements Pershing will introduce several enhancements with the *July* 2013 client statements:
 - Client Service Information Changes The section has been simplified to include only general client information and client service contact information. The client's specific account-related information will now be displayed in a new section: Your Account Information.
 - Corporate Actions Enhancement the display of corporate action events is no longer optional and will appear on all brokerage account statements, displayed near the end of the statement.
 - Portfolio Holdings Changes International and domestic securities will now be displayed in a single holdings section; each was previously displayed separately. The change necessitated minor adjustments to the information displays:
 - The quantity and date fields' order has been switched in the tax lot holdings display. All the footnote superscripts, which may accompany individual tax lots, are moved to the date column.
 - For international securities or those without tax lots, the quantity column now appears to the right of the description. The added security information is indented under the bold security line.
 - A holdings summary organized by currency has been added and will appear for accounts with multiple currencies.
 - <u>Investor Communication Redesign</u> Pershing is enhancing and redesigning investor communications to create a more consistent experience for your clients. The suite of investor letters is being updated to ensure consistency in font size and style and to simplify design features.

• Activities of Non-Registered Branch Office Employees (Assistants)

Please keep in the mind that non-registered branch office employees should not be compensated on any basis other than a salary or hourly wage and have limitations on the capacity in which they can act. Specifically, unregistered persons may contact prospective customers only for purposes of:

- 1. Extending invitations to firm-sponsored events at which any substantive presentations and account
- or order solicitation will be conducted by appropriately registered personnel;Inquiring whether the prospective customer wishes to discuss investments with a registered person;
- and3. Determining whether the prospective customer wishes to receive investment literature from the firm.

To avoid confusion in customer correspondence, unregistered persons should use the title "Representative Assistant" and always include the disclosure "Contact John Doe, Registered Representative, at xxx.xxx for additional information."

Unregistered persons may <u>not</u>:

- 1) Discuss general or specific investment products or services offered by PCS;
- 2) Solicit new accounts or orders; or

3) Pre-qualify prospective customers as to financial status, investment history and objectives.

See related online NRS BD WSP Sections entitled "Cold Calling/Telemarketing: Activities by Unregistered Personnel" and "Registered Personnel: Statutorily Disqualified Individuals" for additional information.

Regulatory Reference: NASD Rule 1060, NASD NTM 88-50

Action Required

New Business Processing - Broker Dealer Changes

When submitting broker dealer changes, please remember that such requests cannot be processed without an accompanying new account form. The client information contained in the new account form is an important way for you as the representative to evidence that the transaction is both suitable and in the best interest of your client. Broker dealer change forms submitted without a new account form are not considered in good order and will not be processed. Please contact the <u>Operations department</u> if you have any questions.

Corestone Account Application and Margin Suitability

Please be advised that, effective immediately, submission of Cornerstone Account Applications on brokerage accounts not already set up for margin *must* also submit a margin agreement *if* the client does not check the box in Step 6 indicating they do not want margin on the account.

Representatives are reminded that Pershing systematically sets up the client account for margin with submission of the Corestone Account Application unless the client specifically elects against it and that all usual margin suitability requirements are applicable and should be considered before adding check-writing or a debit card to a brokerage account. Please contact your Supervisor with any questions or concerns.

Updating Client Information: 36-Month Books and Records Letters

As indicated in PCS' Registered Representative (RR) Manual, it is not sufficient to 'initially' know your customer and not follow up on changes which may materially alter suitability determinations. Marriages, divorces, career changes, births, and deaths can substantively change a client's investment profile.

SEC rules require that a client receive a copy of account information account 36 months after account opening so that the information can be reviewed once again and updated or corrected where applicable.

Pershing mails Books and Records letters on PCS's behalf 36 months from the date that the account was opened on the Pershing platform and provides a summary of critical account information like address, telephone number, investment objective, net worth, etc. The letters provide space for the client to provide updated information and include a return envelope to send the information back for processing.

Unfortunately, when Pershing designed the letter, they **did not** include a line where the client(s) can sign to authorize any change, and Operations cannot make substantive changes to a client account without the client's written authorization. If Operations receives in a Books and Records Letter with a change other than a phone number update, that letter will be routed to the RR so that he or she can follow up with the client and gather the appropriate signature authorization.

Pershing does not support customization of this letter, so PCS is unable to have a signature line added. As a workaround, the Operations and Compliance departments recommend use of the Customer's Investment Profile Suitability Update Form (Updated 05012012) which has a spot for both the client(s) and rep's signature. Please contact Mary Heckel for a pad of these forms if you need them.

Technology Update 2nd Quarter 2013

This quarter, the PCS IT Dept, gave a facelift to our webpage!



A nice, bright and fresh look! This page will be temporary as we turn to you, our Advisors, for suggestions on how to make your webpage even better!!!

- The files on the "V" drive are backed up by PC but not the files on your personal device, please back them up to an external drive or online service. For more assistance or information please send an email to <u>PCSHelpdesk@pcsbd.net</u>.
- Please don't respond to email about American Express Cards, theBBB, or banks discussing your accounts stating that it needs a quick response. Usually there is an attachment and if opened can put your data at risk. Also delete any emails that are asking for passwords, account numbers or your social security number. A legitimate institution will not ask for any information like this.
- Use the latest anti-virus software updates. If your anti-virus subscription has already expired, or you don't have one, you can download "Microsoft Essentials". It is totally free and will help keep your desktop/laptop virus free.

To download Microsoft Essentials, please cut and paste this link into your internet address bar and follow the instructions:

http://windows.microsoft.com/en-US/windows/securityessentials-download

Compliance Update 2nd Quarter 2013

Action Required

RIA Manual Updates – Investment Processes/Portfolio Management

Due to recent regulatory guidance, the online RIA Manual section entitled, "Investment Processes/Portfolio Management" has been materially revised. All Investment Advisory Representatives (IAR) and Managing Principals (MP) should review it in its entirety, but pay special attention to the <u>NEW</u> requirement that all advisory account recommendations now require written documentation/evidence that either: the IAR used a recognized third-party source (Morningstar), <u>or</u> utilized research developed by the IAR, which MUST be pre-approved in writing by their MP. Also, any client investment policy statements or guidelines/restrictions requested by clients must be pre-approved by the MP. MP's are responsible for monitoring compliance with the restrictions on an on-going basis.

Code Of Ethics / Insider Trading Attestation - 2013

Please find attached to this Newsletter the 2013 COE/Insider Trading Attestation, as well as the 2013 Code of Ethics. Please review the Code of Ethics, sign the Attestation and return it to the Compliance Department. The completed Attestations are **due by Friday August 30, 2013**.

LinkedIn Security Update

Effective July 15, 2013, LinkedIn is changing how its privacy settings work in relation to a setting called "data sharing with 3rd party applications." This change alters the identifying information for counterparties that is available for capture by Global Relay Archive for LinkedIn. As such, all PCS associates using a LinkedIn account must <u>immediately</u> enable the privacy setting called "data sharing with 3rd party applications." This will ensure that all future interactions between PCS LinkedIn users are archived with all parties' names and email addresses. MP's are responsible for ensuring this setting is enabled for each associated person under their supervision who has a LinkedIn account.

Reminders

Updated Advisory Account Selection Disclosure

The Advisory Account Selection Disclosure form has been revised. The revisions add some detail questions related to the type of research used by an IAR and also questions related to any investment restrictions provided by the client limiting the investment selection for an account.

The PCS RIA Manual, Investment Processes Section states: It is PCS' policy to recommend to a client the purchase, sale or the retention of a security only if PCS and the investment advisory representative ("Advisory Representative") for the client (i) has a reasonable basis for believing that the recommendation is suitable and appropriate for such client and (ii) has support for all recommendations provided to the client.

In terms of support for recommendations to a client, the investment advisory representation for that client will (i) consult with research sources they believe are appropriate, including research from reputable third party sources (e.g., Morningstar), (ii) use research developed by the Advisory Representative that has been reviewed by supervisory personnel from PCS and (iii) consider mainstream media sources and recognized journals. All support for each recommendation for each client will be retained in PCS' books and records for each client.

- > PCS obtains substantial background information about each client's financial circumstances, investment objectives, and risk tolerance, among other things, through an in-depth interview and information gathering process that includes a client Profile.
- In addition to such information, clients may provide the Advisory Representative with written investment policy statements or written investment guidelines that the Advisory Representative (on behalf of PCS) reviews, approves, and monitors as part of the firm's investment services, subject to any written revisions or updates received from a client. In addition, as noted below, a designated Managing Principal for PCS reviews and approves the client's written investment policy statements or written investment guidelines and PCS' supervisory personnel monitor the implementation of such written investment policy statements or written investment policy statements or written investment policy.
- In order to adequately document the security and/or product selection process, an Advisory Account Selection Disclosure Form ("Form") must be: (i) completed by the Advisory Representative for each new PCS advisory account (Financial Planning, Allocation Account, or Third-Party Asset Management "TPAM"); (ii) provided to the designated Managing Principal for approval; and (iii) submitted by the Managing Principal to the Operations Department for processing. The Form is used to better evidence the client's account objectives, restrictions, account type, and sub-account selection criteria. The Profile must be included with the Form in determining the particular recommendations for each client. The Form is supplemental to the Customer Account Form, which is also required to be submitted for all Allocation Accounts and TPAM accounts.

Advisory: POA=Custody

All Investment Advisory Representatives are reminded that advisory clients are not permitted to grant power of attorney to any advisory representative of Private Client Services. Full Power of Attorney, when granted to the RIA equates to the RIA having custody of the assets. PCS does not maintain custody and therefore cannot be named or granted POA.

Complaints

Representatives are reminded that they must forward any written customer complaint to their Managing Principal immediately upon receipt, who in turn must notify Compliance and Senior Management immediately.

U4 Registration Information

Registered Representatives (RR) are reminded that all registration information must remain current at all times. This includes information related to changes to name, address (business or personal), marital status, outside business activity, financial status such as liens, judgments, compromise with creditors, garnishments and other court orders, tax levies, wage withholdings, bankruptcies, etc. Any updates should be brought to the attention of your Managing Principal and the Licensing and Registration Department.

DBA Email Addresses

RRs are reminded that any email address used to conduct securities or approved OBA business must be disclosed to and monitored by PCS. This includes email addresses for doing business as (dba) names and/or organizations. For additional information please follow the link below:

http://www.investmentnews.com/article/20130521/FREE/130529985?utm_source=breakingnews-20130521&utm_medium=in-newsletter&utm_campaign=investmentnews&utm_term=text#

AML Red Flags

PCS is committed to maintaining a strong internal program to detect and deter any instances of money laundering as well as any activities that facilitate money laundering or the funding of terrorist or criminal activities. As a PCS associate, you are part of those efforts, in fact the "front line of defense." Please review the online RR Manual section entitled, "Money Laundering Detection and Deterrence," and the online WSP

Manual section entitled, "Anti-Money Laundering (AM) Program: Red Flags. If you become aware of any of the "Red flags," you must immediately alert your Managing Principal or Compliance. It is important to understand that the final determination as to whether or not the action is reportable or even actually suspicious upon further investigation is not yours to make.

Part-Time Staff

Representatives are reminded that all full-time and part-time support staff must be identified with PCS (Managing Principal - MP) and must be fingerprinted. If affiliated with an investment advisory representative, they must also be listed as an access person. The same is true when a support person leaves, PCS (MP) must be notified so the firm can remove the person from the FINRA system, Access Persons list and other controlled systems

Client Notes

Communications between a registered representative and his or her customers are frequently conducted either in person or via the telephone. Such communications typically will include specific discussions about an investment or proposed investment of the customer's assets and are subject to the same restrictions, requirements and guidelines that apply to written communications. In particular, verbal communications must be fair, balanced and accurate.

Memorializing and documenting such communications is an important component of the broker-dealer's customer communications and recordkeeping obligations. There are several methods a RR might use to record verbal communications such as entering data into a customer relationship management (CRM) system or other electronic customer database, adding a note to a dedicated electronic folder on the firm's network, recording the conversation on a handwritten note that will be maintained in the customer's file, or keeping a log or spreadsheet to record the specifics of the conversation, among other methods.

Good documentation can help ward off problems with both customers and regulators. However, notes alone may not be enough - they must be thorough. Since notes could potentially be prepared after the fact, the more details they contain, the more persuasive they are likely to be if ever brought into question. Details help to give credibility to an RR's notes, as does the automatic date and time stamp produced by a CRM. Showing that you have made a determined effort to ascertain a customer's risk tolerance, objectives, time horizon and other financial information, as well as disclosing potential risks of an investment, may ward off a potential customer complaint or serve as back up to your actions if you are the subject of a customer complaint or regulatory inquiry.

Sometimes in difficult financial times, customers who have lost money may imagine maltreatment, and whether a complaint is valid or not, a registered representative still may find his or her every move under scrutiny. Keeping good notes is one way to reduce risks associated with the financial services business. Memorializing customer verbal contacts with a follow-up written communication is another. Just relying on your recollection of phone calls or in-person meetings may increase your liability.

Firm Element CE / Annual Compliance Meeting / Annual Compliance Questionnaire

The 2013 Firm Element Continuing Education Program is now available for all associates. Please review the CE announcement distributed by Ernest Sampson on July 5th, 2013. You may access the courses via the PCS Website by clicking on the RegEd link. Also now available is the 2013 Annual Compliance Meeting. The Annual Compliance Questionnaire should be available by August 6th, look for a notification around that date. All three programs (CE, ACM, ACQ) must be completed by October 31, 2013.

Managing Principal Information

Client Account Review Reminder

Managing Principals are reminded that all Advisory Accounts must be reviewed each year, and that the Senior Account Reviews must also be completed prior to the end of the year. For specific details related to the number of Senior Accounts that are required to be reviewed please consult the Supervisory Procedures Manual on the PCS Supervisors directory.

Variable Annuity Review Reminder

Managing Principals should have received an updated list of all variable annuity applications submitted to PCS within the last week or so. Please review the spreadsheet, as well as applicable provider resources in order to complete your supervisory responsibility and document your review / findings accordingly within your folder on the PCS Supervisors directory.