

First Clearing Business Continuity Information

The following information concerns First Clearing, LLC (hereinafter referred to as "FCLLC") efforts in the event of an emergency or disaster. Securities Industry regulations require each member firm to create and maintain a business continuity plan reasonably designed to meet its obligations to its clients or other counter-parties. In accordance with these requirements, FCLLC has designed a business continuity plan to address possible scenarios in efforts to minimize any service impact to our introducing firms or their clients.

In keeping with the regulatory requirements, the business continuity plan for FCLLC is designed to address key areas of concern - including but not limited to the following:

- Data back-up and recovery;
- Mission critical systems;
- Financial and operational assessments;
- Alternate means of communication between FCLLC and its customers;
- Alternate means of communication between FCLLC and its employees;
- Alternate physical locations of employees;
- Critical business constituent, bank and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How FCLLC will ensure that customers have access to their funds and securities in the event FCLLC determines it is unable to continue its business.

At a minimum, the FCLLC business continuity plan is reviewed, updated and tested on an annual basis. Additionally, our primary internal and external application providers periodically conduct testing of their own back-up capabilities to ensure that, in the event of an emergency or significant business disruption, they will be able to provide us with the critical information and applications we need to continue or promptly resume our business.

When testing our plan, we review the recovery time and resumption time period for all mission critical systems. Making sure that any type of disruption does not unduly impact our introducing firms or their clients is extremely important to us, and our business continuity plan is designed to allow us to continue to provide the quality service that has come to be expected from FCLLC.

If clients of the firms to which we provide clearing services for cannot in fact contact their firm due to a business disruption, they should contact First Clearing, LLC for assistance at 877-496-3223.

First Clearing's mailing address is as follows:

First Clearing Correspondent Services
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