

CLIENT 1ST ADVISORY GROUP BUSINESS CONTINUITY PLAN (BCP)

I. EMERGENCY CONTACTS

The Firm has designated contacts for each office. See below for contact information by office location.

Location	Contact Name	Phone Number	Email
Clearwater, FL	Dave Stieh	727-365-0309	dave@c1ag.com
Hattiesburg, MS	Michelle Mabry	601-466-0289	michelle@c1ag.com
Vero Beach, FL	Craig Phillips	727-422-9301	craig@c1ag.com

II. FIRM POLICY

Our firm's policy is to respond to a Significant Business Disruption (SBD) by first safeguarding our employee's lives and the firm's property, then making financial and operational assessment needed for quick recovery and business resumption. It is our policy to maintain digital copies of all documents that may come through our offices. Those as well as all other client information can be accessed anywhere through multiple third-party service providers.

A. SIGNIFICANT BUSINESS DISRUPTIONS (SBDs)

We have processes in place for internal and external SBDs. The effects of an internal SBD are localized to our firm or a specific office (property damage, connectivity issues, etc.). External SBDs are larger in scale and prevent the operation of securities markets or a number of firms, examples include hurricanes, regional flooding, or terrorism. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our custodians.

B. APPROVAL AND EXECUTION AUTHORITY

Our Chief Compliance Officer, David Stieh, is responsible for approving the plan and conducting an annual review. Operations Manager, Morgan Mabry, is responsible for periodic testing of the plan. The local contacts for each office (listed above) have the authority to execute this BCP in the case of a regional disruption.

C. PLAN LOCATION AND ACCESS

Our firm maintains copies of its BCP plan, the annual reviews and the changes that have been made for inspection. An electronic copy of our plan is located within our corporate file management system as well as on our website.

III. BUSINESS DESCRIPTION

Our firm conducts business in equity, fixed income and derivative securities on behalf of our clients. We do not perform any type of clearing function for ourselves or others. Furthermore, we do not hold customer funds or securities. We select the investment allocation for our clients' accounts. We accept and enter service requests on behalf of our clients. All trades are sent through to our custodian, who compares, executes, clears, settles and allocates the service requests to each account. Our custodian also maintains clients' accounts. The custodian can grant our clients access to their accounts and deliver funds and securities to them. Our firm services only retail clients.

Our custodian is:

TD Ameritrade Institutional
7801 Mesquite Bend Drive
Suite 112
Irving, TX 75265

Our service team can be reached at 888-354-8361 option 2 ext. 13. TD Ameritrade operates offices in markets across the US, in the event that one location is compromised calls will be forwarded to a working office.

IV. OFFICE LOCATIONS

We have two offices in Florida and one in Mississippi. The addresses and phone numbers are as follows:

611 Druid Road Suite 707 Clearwater, FL 33756	736 Beachland Boulevard Vero Beach, FL	104 Titus Boulevard Hattiesburg, MS 39402
727-450-2301	772-231-3322	601-264-0946

V. ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

In the event of an internal SBD, the Clearwater office will move our staff from the affected office to an office in our same complex, if available, retaining the same phone lines. Otherwise, we will seek to temporarily relocate nearby. In the event of an external SBD, we will move our staff to one of our unaffected office locations, Vero Beach or Hattiesburg. Similarly, in the event of an SBD at one of our other office locations, the unaffected offices will serve as temporary locations.

VI. CLIENTS' ACCESS TO FUNDS AND SECURITIES

Client 1st does not maintain custody of clients' funds or securities, which are maintained by our custodian, TD Ameritrade. In the event of an internal or external SBD, if telephone service is available, our registered persons will take clients' orders or instructions and contact our custodian on their behalf. If web access is available, trades and client instructions can be processed as usual. Trading and fund instructions may also be given directly to TD Ameritrade by contacting them directly. Our firm also makes the information available to clients through our disclosure policy.

VII. DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)

Our firm maintains its primary books and records in Citrix ShareFile. Through Citrix ShareFile all of our data, is backed up nightly in geographically distinct locations simultaneously. ShareFile also performs a full backup recovery in the event of a system-wide emergency. Their platform is also fully redundant and they utilize mirrored drives for all data storage to eliminate or substantially reduce any loss of data. Representatives from each office are responsible for responding to information requests for those offices.

VIII. FINANCIAL AND OPERATIONAL ASSESSMENTS

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our web site; www.c1ag.com, telephone voicemail and secure e-mail. In addition, we will retrieve our key activity records as described in the section above, Data Back-up and Recovery (Electronic).

B. Financial and Credit Risk

In the event of an SBD we will contact our custodians, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our clients.

IX. MISSION CRITICAL SYSTEMS

A. Our Firm's Mission Critical Systems

Order Taking

Currently our firm receives service requests from clients via the telephone and by in person visits by the customer. During an SBD, either internal or external, we will continue to take requests through any of these methods that are available and reliable, or in addition, as communications permit, we will inform our clients what alternatives they have to send their orders to us. Clients will be informed of alternatives by phone or email. If necessary, we will advise our clients to place orders directly with their custodian; TD Ameritrade at 888-354-8361.

Order Entry

Currently, our firm enters requests electronically and sends them to our custodians electronically or telephonically.

In the event of an internal SBD, we will send requests to our custodians by the fastest alternative means available, which include cell phones, courier service or express mail service (FedEx, UPS, etc.). In the event of an external SBD, we will maintain the requests in electronic format, and deliver the order to the custodians by the fastest means available when it resumes operations.

Mission Critical Systems Provided By Our Custodian Firms

Our firm relies, by contract, on our clearing firm to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to clients' accounts.

X. ALTERNATE COMMUNICATIONS BETWEEN THE FIRM AND CLIENTS, EMPLOYEES AND REGULATORS

A. Clients

We now communicate with our clients using the telephone, email, our website, U.S. Mail, and in person visits at our firm. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with a paper copy in the U.S. Mail.

B. Employees

We now communicate with our employees using the telephone, e mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that the partners can reach all representatives and employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

Clearwater	
Caller	Recipient
Craig Phillips	David Stieh
David Stieh	Herbert Pontzer

Vero Beach	
Caller	Recipient
Craig Phillips	Sharon Bastide; Linda Robbins

Hattiesburg	
Caller	Recipient
Michelle Mabry	Pam Hearn

C. Regulators

We are currently registered with the SEC and the states in which we do business. We communicate with the SEC using the telephone, email, fax, U.S. Mail and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

XI. REGULATORY REPORTING

Our firm is subject to regulation by the SEC and the states. We now file reports with our regulators electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC and states, to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

XII. DISCLOSURE OF BUSINESS CONTINUITY PLAN

We provide in writing a BCP disclosure statement to clients at account opening. We also post the disclosure statement on our website and mail it to clients upon request. In addition, we provide an update written copy of the BCP to our clients who do not maintain electronic communication capabilities.

XII. UPDATES AND ANNUAL REVIEW

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our custodians. In addition, our firm will review this BCP annually, during the first quarter of the year, to modify it for any changes in our operations, structure, business, or the locations and contact services of our custodians.

XIV. SENIOR PARTNER APPROVAL

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

Signed: *Craig Phillips*

Title: CEO /Managing Partner

Date: 4/24/2019