

Updated 9.3.18

I. Emergency Contact Persons

Our firm's two emergency contact persons are: Gilman C. Perkins ("Executive Principal"), 107 John Street, Southport, CT 06890, (203) 418-2010, cperkins@pfm-llc.com, and Dan Glusker ("CCO and Managing Director") 107 John Street, Southport, CT 06890, (203) 418-2023, Dan.Glusker@pfm-llc.com. These names will be updated within 30 days in the event of a material change, and will be reviewed and updated if necessary within 17 business days after the end of each calendar year. These names will also be reported to the Financial Industry Regulatory Authority, Inc. (the "FINRA") through FINRA's Contact System at <http://www.finra.org/Industry/Compliance/RegulatoryFilings/FCS/index.htm>.

Rule: FINRA Rule 4370(f); NASD Rule 1160.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption ("SBD") by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will advise customers. The firm does not execute securities transactions on behalf of its customers nor have custody of customer funds or securities.

A. Significant Business Disruptions (SBDs)

Our Business Continuity Plan ("BCP"), as set forth herein, anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption.

B. Approval and Execution Authority

The Executive Principal is responsible for approving the BCP and for conducting the required annual review. The Executive Principal has the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our BCP is saved on the firm's network storage system.

III. Business Description

The firm provides marketing/introducing service in connection with the offer and sale of securities of unaffiliated issuers in transactions which are exempt from the registration requirements of Section 5 of the Securities Act of 1933, as amended (the "1933 Act").

The firm does not engage in order taking in securities on behalf of its clients. Additionally, the firm does not have custody of customer funds or securities.

IV. Office Locations

Our office is located at 107 John Street, Southport, CT 06890 (the "Principal Office"). Its main telephone number is (203) 418-2000. Our employees may travel to that office by means of foot, car, train, and bus. We do not engage in order taking and entry at this location. Other than communication systems (phone and computer) we do not have mission critical systems.

V. Alternative Physical Location(s) of Employees

In the event of an SBD at our Principal Office, we will move our staff to 2575 North St, Fairfield, CT 06824. We do not engage in order taking and entry at this location. Other than communication systems (phone and computer) we do not have mission critical systems.

Such location will have a backup electrical generator to power computer and communications systems in the event of a widespread geographical power failure. In addition, all associated persons have laptops and cell phones with remote access to servers.

Rule: FINRA Rule 4370(c)(6).

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. At this time, the Company engages in the introduction and marketing of private limited partnership interests, including hedge funds, funds of funds and private equity fund. Its clients consist of accredited individuals and institutions. We do not take or execute customer orders.

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.

Rules: *FINRA Rule 3510(a)*; Securities Exchange Act Rule 15c3-1; 15 U.S.C. 78eee (2003).

VII. Data Back-Up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary hard copy books and records and its electronic records at its Principal Office. The Executive Principal is responsible for the maintenance of these books and records, which include without limitation: customer files, personnel files, correspondence files, complaint files, seminars, speeches and interview files, regulatory inspection and inquiry files, compliance files and registration files.

Our firm currently maintains its back-up hard copy and electronic books and records at 2575 North St, Fairfield, CT 06824. Our firm backs up its paper records by scanning them and saving them to optical drives in WORM format and taking them to an off-site location. We back up our records daily on cloud and optical disk drives, which are taken and stored off-site as needed, as determined by the Executive Principal. All books and records that can be stored electronically will be stored daily via cloud backup and quarterly via optical disk drives. Additionally, Firm Servers are imaged daily and copied monthly.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our Principal Office is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our Principal Office is inoperable, continue operations from our back-up site or an alternate location.

Rule: *FINRA Rule 4370(c)(1)*.

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 customers, employees, critical business constituents, critical banks and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our telephone voice mail and secure e-mail, etc. In addition, we will retrieve our key records as described in the section above, Data Back-Up and Recovery.

Rules: FINRA Rules 4370(c)(3),(c)(4), (c)(5), (c)(7), (c)(9 & (g)(2)).

B. Financial and Credit Risk

In the event of an SBD, the designated principal will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact critical brokers, banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations 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. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, including obtaining loans and/or capital contributions from our investors.

Rules: FINRA Rules 4370(c)(3), (c)(8) & (g)(2).

IX. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure our ability to communicate with our clients. More specifically, these systems include: our phone and computer systems. These systems are discussed in Article X below.

X. Alternate Communications between the Firm and Customers, Employees, and Regulators

We now communicate with our customers using the telephone, e-mail, fax, U.S. mail, and in person visits at our firm or at the other's location. 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 paper copy in the U.S. mail.

Rule: *FINRA Rule 4370(c)(4).*

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 senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. The Executive Principal shall invoke use of the call tree.

Caller	Call Recipients
<i>Gilman C. Perkins</i>	<i>Lisa Holzwarth, Kevin Cunningham, Doug Newsome</i>
<i>Dan Glusker</i>	<i>Linda Champagne, John Holzwarth, Maria Daldegan, Doug Steinscheider, Alex Maloney</i>

Rule: *FINRA Rule 4370(c)(5).*

C. Regulators

We are currently members of FINRA, NFA and are registered with MSRB and SEC. We communicate with our regulators using the telephone, e-mail, 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.

Rule: *FINRA Rule 4370(c)(9).*

XI. Critical Business Constituents, and Banks

A. Business constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

Rules: *FINRA Rule 4370(c)(7).*

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: Connecticut Community Bank, 1495 Post Road East, Westport, CT 06880. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from such other bank as the Executive Principal shall determine.

Rules: *FINRA Rule 4370(c)(7).*

XII. Regulatory Reporting

Our firm is subject to regulation by the SEC, FINRA, NFA, MSRB and various states. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC, FINRA, and other regulators 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. Our Regulatory contact information is FINRA Regulation, Inc., District 11, 99 High Street, Suite 900, Boston, Massachusetts 02110.

Rule: *FINRA Rule 4370(c)(8).*

XIII. Disclosure of Business Continuity Plan

We will mail the BCP to customers upon request. Our BCP will be included on our website, www.perkinsfundmarketing.com therein. A copy of our disclosure statement is attached hereto as Exhibit A.

Rule: FINRA Rule 4370(e).

XIV. Updates and Annual Review

Our firm will update this BCP whenever we have a material change to our operations, structure or business. In addition, our firm will review this BCP annually, in or about the first month of each calendar year, to modify it for any changes in our operations, structure or business. A copy of such review will be recorded and filed.

Rule: FINRA Rule 4370(b).

XV. Senior Manager Approval

I have approved this BCP as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD. This BCP will be distributed to each employee and signed to attest to a complete understanding of the firms BCP.

Rule: FINRA Rule 4370(d).

Signed:



Title: Executive Principal

Date: 9.3.18

EXHIBIT A

Since September 11, 2001, the financial community has developed new processes, procedures and regulations to improve the resiliency of the financial markets provide clearer security for clients' assets and reaffirm confidence in the ability to mitigate and/or respond to momentous events.

All members of the FINRA are required to have a Business Continuity Plan in place and to communicate that information to their clients. We have taken appropriate steps to enable us to continue operations in the event of a business disruption and to comply with all financial market rules and regulations. Our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting.

To ensure that we can continue to function as a broker/dealer and to service our clients following a significant business disruption event, the following steps have been implemented:

- 1) A fully-operable back-up facility has been developed. This capability can be activated should a crisis event cause a loss of key services that support our operations
- 2) We periodically back up our books and records and maintain such files at our back-up facility.
- 3) We equipped our back-up office with sufficient communications and other equipment so that we can maintain reasonable communications with our clients, vendors, and regulators, both domestically and internationally.