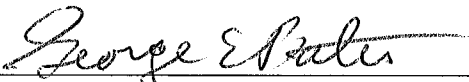


**Bates Securities, Inc.  
 Bates Financial Advisors, Inc.  
 Business Continuity Plan  
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Bates Securities, Inc, and Bates Financial Advisors, Inc. (“Bates”) have a duty to create a disaster recovery plan. This “Business Continuity Plan” has been created to meet the requirements described in FINRA Rule 4370 and is reasonably designed to enable our firms to meet their obligations to customers in the event of a Significant Business Disruption.

Authorized Approval Signature:  
 Printed Name & Title:  
 Date:

  
 \_\_\_\_\_  
 George E. Bates, President  
 \_\_\_\_\_  
 4-11-22  
 \_\_\_\_\_

This Plan is effective from the date approved until the date of its authorized revision, update or replacement (see below).

Date this Plan was no longer effective (date of revision, update or replacement): \_\_\_\_\_  
 Recordkeeping: Discard after \_\_\_\_\_ (date three years from termination of use).

## **Introduction**

FINRA Rule 4370 requires each member to create and maintain a Business Continuity Plan (BCP) that identifies procedures relating to an emergency or Significant Business Disruption (SBD) that are “reasonably designed to enable the member to meet its existing obligations to its customers.” In addition, the plan must address the firm’s existing relationships with other members and counter-parties. This plan must be promptly made available to the FINRA staff upon request.

Rules 4370(b) requires that each member review its plan at least annually to determine if any changes are needed and update its plan more frequently in the event of any material change to its operations, structure, business or location.

The plan should reflect the firm’s business and operations. Therefore, the requirements of the plan, as identified in Rule 4370, are flexible and should be tailored to the firm’s size and needs.

However, at a minimum, Bates plan must address the following areas:

- Data back-up and recovery (hard copy and electronic);
- All mission critical systems;
- Financial and operational assessments;
- Alternate communications between customers and the member;
- Alternate communications between the member and its employees;
- Alternate physical location of employees;
- Critical business constituents, banks, and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How the member will assure customers’ prompt access to their funds and securities in the event that the member determines that it is unable to continue its business.

Each firm is required to only address the elements applicable to its business, but the plan must contain an explanation if any element above is not included.

Rule 4370 requires each member to designate two individuals as emergency contacts that FINRA may contact in the event of a significant business disruption. Each contact must be a registered principal or member of senior management. However,

- If the member has only one principal but has other employees, the second contact should be another firm employee, or
- If the firm has only one principal and no other employees, the second contact may be someone who has knowledge of the firm’s business, such as an accountant, attorney, etc.

Rule 4370 also requires that each member enter this information into FINRA’s Contact System (NCS) at [https://regfiling.finra.org/contacts/ncs\\_contacts.aspx](https://regfiling.finra.org/contacts/ncs_contacts.aspx) and that required changes are made promptly.

## **1. Emergency Contact Persons**

Bates has designated the following individuals to act as contact persons for the firm as required under Rule 4370:

### **Primary Contact**

Name: George E. Bates, President  
Address: 8437 Northern Avenue, Rockford, IL 61107  
Telephone Number: 815-332-4020  
Fax Number: 815-332-4002  
E-mail Address: gebates@batessecurities.com

### **Secondary Contact**

Name: Felicia Gulotta-Johnson, Office Manager  
Address: 8437 Northern Avenue, Rockford, IL 61107  
Telephone Number: 815-332-4020  
Fax Number: 815-332-4002  
E-mail Address: fgulotta@batessecurities.com

These contacts will be reported through FINRA's Contact System. This system may be accessed directly at [https://regfiling.finra.org/contacts/ncs\\_contacts.aspx](https://regfiling.finra.org/contacts/ncs_contacts.aspx) or through the Firm Gateway at [www.finra.org/firmgateway](http://www.finra.org/firmgateway) and must be updated in the event of a material change. In addition, Bates Executive Representative or his written designee must review and update this information, if necessary, within 17 business days of the end of the calendar year. The Executive Representative or his/her designee will also ensure that contact information is updated promptly if changes occur at any time during the year.

### **Executive Representative:**

Bates Executive Representative is George E. Bates.

### **Disaster Recovery Coordinator/Team:**

The Company has designated Felicia Gulotta-Johnson as the "Disaster Recovery Coordinator" ("Coordinator"). In her absence, Jennifer Charles, Compliance Coordinator, will assume her responsibilities.

The "Disaster Recovery Coordinator" has the responsibility to make an immediate preliminary assessment of the nature and extent of the disruption by assessing the following: electricity supply; condition of computer network/phones; damage to the building; HVAC in extreme weather; and other hazards.

If the Coordinator determines that personnel should evacuate the affected location(s), she must make an announcement to all personnel as to appropriate procedures. The announcement may be given via personal contact, e-mail, intercom or other methods as appropriate given the systems

available; the size and location of the staff; and the size of the office or building. This announcement should be short and concise, should calmly identify the situation and should provide instructions to employees on how to respond. This announcement should be repeated as often as necessary to avoid confusion and to ensure all employees are aware of the situation. After ensuring the physical safety of Company personnel, the Coordinator must then implement this BCP.

If the situation does not merit evacuation, steps should be taken to alert designated persons of necessary actions to facilitate ongoing operations in the face of limited disruption. In this case, the Coordinator will determine which, if any, procedures in this BCP should be implemented.

In the event, the SBD has directly affected other areas of the building but has not directly impacted the Company's office, the Coordinator will contact building security or emergency personnel for instructions on how the Company should respond and proceed accordingly.

## **2. Firm Policy**

Bates 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 its customers to transact business. In the event that it is determined the firm is unable to continue its business, the firm will assure customers prompt access to their funds and securities.

### **Significant Business Disruptions (SBDs):**

Bates plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services. The Company's response to an external SBD will rely more heavily on other organizations and systems, especially on the capabilities of the fund companies, insurance companies, custodian, federal emergency authorities, local officials and utility companies.

### **Approval and Execution Authority:**

George E. Bates, President and a registered principal of Bates Securities, Inc., is responsible for approving the plan and for conducting the required annual review.

George E. Bates, President, has the authority to execute this BCP.

### **Plan Location and Access:**

Bates will maintain copies of its BCP plan, a record of the firm's annual reviews, and the changes that have been made to the BCP for inspection by regulators. A hard copy of the Company's Plan is located in its main business location and may be accessed by contacting Felicia Gulotta-Johnson, 815-332-4020, [fgulotta@batessecurities.com](mailto:fgulotta@batessecurities.com).

An electronic copy of the Company’s plan is located internally on Bates Server in the Company U drive, in the Compliance folder, in the BCP subfolder. A back-up copy of this electronic file is maintained in Laserfiche on a separate server.

A copy of the BCP will be provided to FINRA District Office # 8 located in Chicago, IL upon request.

**3. Business Description**

Bates Securities, Inc. conducts business on a subscription basis in mutual funds, variable annuity products, and insurance products. The Company does not hold customer funds, securities or customer accounts. Bates accepts applications from customers for the purchase of these products and sends them directly to the product sponsor for execution and settlement. The product sponsor maintains all the customer accounts and delivers funds and securities upon the customer’s request. Our firm services only retail customers. We do not engage in any private placements or utilize the services of a clearing firm.

Bates Financial Advisors, Inc., an SEC Registered Investment Advisor, conducts business based on client agreements. The Company does not hold customer funds, securities or customer accounts. Bates accepts applications from customers for the purchase of these products and sends them directly to the custodian or product sponsor for execution and settlement. The custodian or product sponsor maintains all the customer accounts and delivers funds and securities upon the customer’s request. Our firm services only retail customers. We do not engage in any private placements.

**4. Office Locations**

The Company or its registered personnel currently operate from the following locations:

Type of Location, Registered or Unregistered	Address and Main Phone Number	Located in a Personal Residence? (Y or N)	Means of Transportation Employees Use to Reach Office	Mission Critical Systems Taking Place at Office
Home Office	8437 North Avenue Rockford, IL 61107 815-332-4020	N	Car	Order taking, entry, maintenance of customer accounts, access to customer accounts
Registered Branch Office	1903 Jefferson Quincy, IL 62301 217-224-1707	N	Car	Order taking, entry, access to customer accounts

**Alternative Physical Location(s) of Employees:**

In accordance with Rule 4370 each member must designate a location at which business will be conducted in the event the primary office of the Company must be evacuated. In accordance with

this requirement, Bates will move critical members of its staff from affected office to George E. Bates' personal residence, located at 18427 E. McNeal Rd., Monroe Center, IL 61052, 815-393-3372.

Bates Company staff located at the Quincy, IL branch will relocate to their personal residence, located at 1620 Fieldstone, Quincy, IL 62301.

## **5. Customers' Access to Funds and Securities**

Bates does not maintain custody of customers' funds or securities.

In the event of a SBD:

1. If telephone service is available, our registered persons will:
  - a. take customer orders or instructions and contact our custodian or the product sponsor on their behalf, or
  - b. provide information to the customer with information on contacting the custodian or product sponsor; and
2. If Web access is available, the firm will post on our Web site that customers may access their funds and securities.

The firm does not maintain custody of customers' funds or securities. Mutual fund sponsors and variable annuity product issuers maintain all account records and documentation related to its customers' investments.

In the event of a SBD:

1. If telephone service is available, our registered persons will make efforts to assist customers in contacting these entities, if so requested.
2. If Web access is available, the firm will post on its Web site information designed to assist customers reach these entities.

The Company will make this and additional information regarding accessing funds and/or securities available to customers through its disclosure policy (below).

If SIPC determines that Bates Securities, Inc. is unable to meet its obligations to its customers or if the Company's liabilities exceed its assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse the Company's assets to its customers. Bates Securities, Inc. will assist SIPC and the trustee by providing applicable books and records identifying customer accounts subject to SIPC regulation.

## **6. Data Back-Up and Recovery (Hard Copy and Electronic)**

Bates maintains its primary books and records in electronic format at 8437 Northern Avenue, Rockford, IL 61107. George E. Bates, President, is responsible for the maintenance of these books and records.

Bates maintains the following document types and forms that are not transmitted to the product sponsor or custodian: customer account forms (new and amended), trade entry forms, client correspondence.

**Back-up of electronic records:**

The firm backs up its electronic records daily on removable hard-drives and keeps a copy of this back-up at 2000 O'Neil Rd., Ste 150, Hudson, WI 54016.

In the event that electronic records are lost, the Company will either physically recover the storage media or electronically recover data from its back-up site, or, if the Company's primary site is inoperable, continue operations from its back-up site or an alternate location.

**7. Financial and Operational Assessments**

**Operational Risk:**

In the event of a SBD, Bates will immediately identify any methods available that will permit personnel to communicate with customers, other employees, critical business constituents, critical banks, critical counter-parties, and regulators.

Although the effects of a SBD will determine the means of alternative communication, the communications options the Company may employ will include telephone and if possible e-mail. In addition, Bates will retrieve key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

**Financial and Credit Risk:**

In the event of a SBD, Bates Securities, Inc.'s FINOP will determine the value and liquidity of its investments and other assets to evaluate the Company's ability to continue to fund its operations and remain in capital compliance.

Bates will contact its custodians, critical banks, and investors to apprise them of the Company's financial status. If the Company determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, Bates will request additional financing from our bank or other credit sources to fulfill its obligations to our customers and clients. If Bates Securities, Inc. cannot remedy a capital deficiency, the FINOP will file appropriate notices with applicable regulators and immediately take appropriate steps consistent with all applicable rules.

In the event of a suspension or termination of the Company's business, the Company will attempt to notify customers regarding the situation and provide them with instructions for accessing their funds or securities, if applicable, for verifying transactions in process or for conducting future business. Notification will be a form allowed based on the circumstances permitted by regulatory authorities and may include telephone calls, letters or a posting on the Company's website.

## **8. Mission Critical Systems**

### **Internal Mission Critical Systems**

Bates does not maintain trading or other critical systems to handle customer accounts since its business is limited to the sale of mutual funds, variable products. The individual product sponsors and custodians maintain all records of customer investments. These companies, as members, are responsible for ensuring that they have policies and procedures in place to ensure their business continuity in the event of a SBD. Bates, in the event of a SBD, will notify investors how to access their account information or obtain assistance directly from these firms.

#### **Order Taking**

Currently, the Company receives orders from customers via telephone, written instruction and in person. During a SBD, the Company will continue to take orders through any of these methods that are available and reliable.

The Company will inform its customers what alternatives they have to send their orders to us in the event traditional methods are interrupted. Customers will be informed of alternatives by disclosure information provided when a new business relationship is established and by calls from personal cell phones, if phone services are affected, through messages via email or posted on the Company's website or other means available. If necessary, the Company will advise its customers to place orders directly with the product sponsors.

#### **Order Entry/Submission**

Currently, Bates enters orders by recording them on paper and sending them to its product sponsor or custodian electronically, by telephone, by facsimile or by mail.

In the event of an internal SBD, the Company will send orders to its product sponsor or custodian by the fastest alternative means available, which may include alternative telephone facilities, including cell phones, messenger or courier, external e-mail connections. In addition, during an internal SBD, the Company may refer customers directly to the product sponsor or custodian for placing orders.

In the event of an external SBD, the Company will maintain the order in electronic or paper format, and deliver the order to the product sponsor or custodian by the fastest means available when it resumes operations.

#### **Order Execution**

The Company does not execute orders. All business transacted by the Company is handled by the product sponsor or custodian.

## **9. Alternate Communications Between the Firm and Customers, Employees, and Regulators**



## Customers

The Company currently communicates 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 a 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.

## Employees

The Company currently communicates with its associated persons using the telephone, e-mail, and in person.

In the event of a 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.

The Company will also employ a call tree so that senior management can reach all associated persons quickly during a SBD, if telephone service is available. The Disaster Recovery Coordinator will be responsible for invoking the call tree. The call tree will include all staff home and office phone numbers.

Caller	Call Recipients
George E. Bates	Craig Cherington, Felicia Gulotta-Johnson
Felicia Gulotta-Johnson	Craig Cherington, George D. Bates, Amanda Gilb
Felicia Gulotta-Johnson	Jennifer Charles, Kim Mathieu, Jennifer Schwarze, Ana Cruz, Breana Nichols, Morgan Tegeler, LeLisa Ditullio
Craig Cherington	Sheryl Holtschlag, Andrew Waggoner

## Regulators

The Company is currently a member of FINRA and is registered with the SEC. In addition, the Bates Securities, Inc. is a member of the MSRB.

Bates Securities, Inc. is registered to conduct business in the following states: AL, AK, AZ, AR, CA, CO, DC, FL, GA, IL, IN, IA, KS, KY, ME, MD, MI, MN, MS, MO, MT, NJ, NM, NC, OH, OR, PA, SC, TN, TX, UT, VA, & WI.

Bates Financial Advisors, Inc. is registered with the SEC and notice filed to conduct business in the following states: AZ, CA, CO, FL, IA, IL, IN, MI, MO, TN, TX, and WI.

Bates communicates with applicable regulators using the telephone, e-mail, fax, U.S. mail, and in person.

In the event of a 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.

**10. Critical Business Constituents, Banks, and Counter-Parties**

**Business constituents**

Bates has contacted our critical business constituents (businesses with which the Company has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which the Company can continue its business relationship with these businesses in light of the internal or external SBD. The Company 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.

Our major suppliers are:

<b>Business Constituent</b>	<b>Address, Phone Number</b>	<b>Alternative Supplier</b>	<b>Address, Phone Number</b>
Capital Group/ American Funds	(800)421-4225 P.O. Box 6007 Indianapolis, IN 46206-6007		
TD Ameritrade	(800) 431-3500 P.O. Box 650567 Dallas, TX 75265-0567		
Fidelity Investments	(800) 523-7166 P.O. Box 77001 Cincinnati, OH 45277-0040		
Pacific Life	(800) 800-7646 P.O. Box 9000 Newport Beach, CA. 92658-9030		
Lincoln Financial Group	(877) 275-5462 150 North Radnor- Chester Road Radnor, PA 19087		
Laserfiche	(800) 985-8533 3545 Long Beach Blvd Long Beach, CA. 90807		
Garcea Computers, LLC	(815) 494-6050 318 N. First St. Rockford, IL 61107		

Frontier Communications	(800) 554-8167 180 S. Clinton Ave, 7 <sup>th</sup> Floor Rochester, NY 14646-0700		
Comcast Business	(800) 391-3000		

## **Banks**

Bates has contacted its banks and lenders to determine if they can continue to provide the financing that the Company may need in light of the internal or external SBD. The Company's accounts are currently with the following institutions:

<b>Types of account (i.e. checking, savings, PAIB, escrow)</b>	<b>Name of Financial Institution</b>	<b>Address of Financial Institution</b>	<b>Telephone Number</b>	<b>Contact Name</b>
Checking	Midland States Bank	6838 E. State St., Rockford, IL	(815) 398-6500	
Checking	Illinois Bank & Trust	4571 Guilford Rd Rockford, IL	(815) 489-2114	

## **Counter-Parties**

Bates has contacted our critical counter-parties, such as other broker-dealers or registered investment advisors, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our product sponsors and custodians or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

## **11. Regulatory Reporting**

Bates is subject to regulation by FINRA and SEC, as well as various state and other securities regulators (see list of states in Part 10 – Regulators)

The Company currently files 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 a 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.

The Company's current regulators can be reached as follows:

FINRA District Number 8:

Address: 55 West Monroe Street, Ste 2700, Chicago, IL 60603-5052

Phone: 312-899-4400

Risk Monitoring Analyst: Rocco Tucci

E-mail: [rocco.tucci@finra.org](mailto:rocco.tucci@finra.org)

Risk Monitoring Director: AnnMarie McGarrigle

Phone: 215-209-7063

E-mail: [annmarie.mcgarigle@finra.org](mailto:annmarie.mcgarigle@finra.org)

Single Point of Accountability: Elizabeth Page

Phone: 617-532-3401

E-mail: [elizabeth.page@finra.org](mailto:elizabeth.page@finra.org)

SEC Chicago Region:

Address: 175 W. Jackson Boulevard, Ste 1450, Chicago, IL 60604

Phone: 312-353-7390

For information on contacting states where the Company is registered or notice filed, please visit [www.nasaa.org](http://www.nasaa.org). Bates Securities, Inc. is also registered with the MSRB. For information regarding this organization, please visit the following website: [msrb.org](http://msrb.org).

## **12. Disclosure of Business Continuity Plan**

The Company will disclose in writing a summary of our BCP to customers at account opening or at the time a business relationship is established. The Company will notify customers in writing when material changes are made to the Plan than may affect their business relationship with the Company. The Company will also post the summary on our Web site and mail it to customers upon request.

The summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope. In addressing the events of varying scope, the summary:

1. Provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption);
2. States whether we plan to continue business during that scenario and, if so, our planned recovery time; and
3. Provide general information on our intended response.

Our summary also discloses the existence of back-up facilities and arrangements. A copy of the Company's disclosure statement is included at the back of this Plan.

## **13. Updates and Annual Review**

The Company will update this plan whenever there is a material change to its operations, structure, business or location or to those of the clearing firm.

The Company's BCP will be reviewed and modified, if necessary, at least annually, but no later than within 12 months of the date on which this Plan was put into effect or previously reviewed, to take into account any changes in the Company's operations, structure, business, or location.

## Customer Disclosure Statement

### **Bates Securities, Inc.**

### **Bates Financial Advisors, Inc.**

Bates plans to quickly recover and resume business operations after a significant business disruption (SBD) and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our company's business continuity plan (BCP) is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

The BCP 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; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

The product sponsor or custodian maintains all records related to your investments and account holdings and backs up important records in accordance with their business continuity plan. For more information on their contingency plan, please contact the sponsor or issuer directly at the telephone number provided on your statements or through their website.

**Significant Business Disruptions:** The Company's plan takes into account two kinds Significant Business Disruptions, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services.

**Internal SBDs:** In the event of a disruption in the Company's business operations due to an internal SBD, the Company will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location.

If personnel or operations must be moved to an alternate location, the Company anticipates that it will resume regular operations as quickly as possible.

**External SBDs:** In the event of a disruption in the Company's business operations due to an external SBD, the Company will attempt to continue to conduct business as usual by moving its operations to an alternative location outside the effected area, if possible, or by providing customers with alternative communication arrangements, as indicated below, to conduct business or to access their funds and securities.

The Company will attempt to resume business within 24-48 hours and to keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, the Company will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event.

If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**Communications:** In the event you are unable to reach the Company at our main number, please proceed as follows:

1. Contact the Company at the following alternate telephone number: (815) 871-1322.
2. Contact the Company via email at: [batessec@batessecurities.com](mailto:batessec@batessecurities.com).
3. Access the Company's website at [www.batesfinancialadvisors.com](http://www.batesfinancialadvisors.com).
4. Contact the product sponsor directly at the number listed on your most recent statement.
5. Contact the custodian issuer directly at the number listed on applicable offering documents.
6. Access the product sponsor or custodian website for more information on contacting this entity and their business continuity plans. The website address can generally be found on your statement or offering documents.
7. Contact FINRA's District office and/or the SEC's Regional Office at the following telephone numbers for more information on the company's status and additional instructions:

FINRA District Office  
312-899-4400

SEC Regional Office  
312-353-7390

**Contact information:** Any questions regarding the Company's Business Continuity Plans should be addressed to: George E. Bates, President, 815-332-4020.