

Jordan, Knauff & Company, LLC

Business Continuity Plan

I. Emergency Contact Persons.

The emergency contact persons for Jordan, Knauff & Company, LLC ("JKC" or the "Company") and their contact information are as follows:

G. Cook Jordan, Jr. 312-254-5901 (office)
312-925-9123 (mobile)
cj@jordanknauff.com

Michael Collins 312-254-5904 (office)
312-282-5462 (mobile)
mcollins@jordanknauff.com

JKC's Executive Representative is responsible for the review of contact names within 17 business days of the end of each quarter for necessary updates in the case of a material change.

II. Firm Policy.

JKC'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 clients to transact business.

A. Significant Business Disruptions. Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only JKC'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. Our response to an external SBD relies more heavily on other organizations and systems.

B. Approval and Execution Authority. G. Cook Jordan, Jr. is responsible for approving this BCP and for conducting the required annual review. Michael Collins has the authority to execute this BCP.

C. Plan Location and Access. JKC will maintain copies of its BCP plan, the annual reviews, and the changes that have been made to it for inspection by FINRA. We have given the FINRA District 8 office a copy of our plan. An electronic copy of our plan is located on the Chicago Partners server in the JKC file, subfile Broker-Dealer Registration.

III. Business Description.

JKC acts as an independent consultant on sale of business transactions, business acquisition transactions and capital formation transactions. JKC does not hold, control or possess client funds or securities in the course of its business. JKC does not accept or enter orders for retail securities transactions. Rather, client funds in sale, acquisition and capital formation transactions are transferred strictly and exclusively between the seller and the buyer or investor.

IV. Office Locations.

JKC has offices in two locations.

A. Primary Office. JKC's primary office is located at 200 W. Madison, Ste. 980, Chicago, Illinois 60606. The main telephone number at this location is 312-254-5900. Employees in this office travel to the office by means of public transportation or personal car.

B. Branch Office. JKC also has an office of convenience, solely for the use of its Financial and Operations Principal, George Nicholson, located in Kansas City, Missouri at 1600 Genessee, Room 505, Kansas City, Missouri 64101. The main telephone number at this location is 816-588-4147. George Nicholson travels to this office by means of personal car.

V. Alternative Physical Location(s) of Employees.

In the event of an SBC, JKC intends to temporarily operate its business from the individual employees' homes until temporary office space can be located.

VI. Customer Access to Funds and Securities.

JKC does not maintain custody of client funds or securities. As an investment bank providing advisory services on corporate and capital formation transactions, JKC does not engage in retail broker-dealer business and, thus, does not have the need for a relationship with a clearing firm. In the instance, JKC's business should change in the future, the Company will create appropriate procedures to make customer funds and securities available in the event of an SBD.

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

JKC maintains its hard copy books and records and its electronic records at its primary office in Chicago. Diane Nicholson and Ben Friedman, JKC Bookkeepers, are responsible for maintenance of hard copy books and records and can be reached at 312-485-1233. Inspired Communications, Inc., 1414 Montauk Ct., Bartlett, IL 60103, is the company responsible for backing up our network files at an offsite location on a daily basis. Inspired Communications can be reached at 630-233-1331. NetSource

Communications, Inc., (2368 Corporate Ln., Ste. 112, Naperville, IL 60563, 630-778-1212) is responsible for the Company's email system and for archiving past emails in connection with the Company's FINRA membership. Some examples of the types of documents maintained by the Company include:

- E-mail correspondence;
- Engagement agreements and related documents and correspondence;
- Timesheets;
- Expense Reports;
- Bank records and related documentation.

In the event of an internal or external SBD that causes the loss of our paper records, JKC will physically recover them from the back-up site. For the loss of electronic records, JKC will either physically recover the storage media or electronically recover data from the back-up site.

VIII. Financial and Operational Assessments.

A. Operational Risk. In the event of an SBD, JKC will immediately identify what means will permit the Company to communicate with its clients, employees, critical business constituents, banks and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options the Company intends to employ will include (where available) the JKC email system, telephone, office voice mail and cell phones. In addition, JKC will retrieve key records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

B. Financial and Credit Risk. In the event of an SBD, JKC will determine the value and liquidity of its investments and other assets to evaluate its ability to continue to fund operations and remain in capital compliance. If we determine that we may be unable to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, including Managing Principal contributions and/or outside financing.

IX. Mission Critical Systems.

Because JKC is not engaged in opening or maintaining customer accounts and holding or controlling customer funds or securities as in the case of a retail broker-dealer, the Company does not have the need for mission critical systems as defined by Rule 3510 including, order taking, order entry, order execution or services provided by a clearing firm. Therefore, the Company does not have procedures for mission critical systems at this time. However, in the instance that JKC's business would require such systems, the

Company will promptly create procedures to address mission critical systems in this BCP.

X. Alternate Communications Between the Firm and Clients, Employees and Regulators.

A. Clients. Currently, the Company communicates with its clients using telephone, email, its web site, fax, U.S. mail and in personal visits. In the event of an SBD, the Company will assess which means of communications are still available and use the means closest in speed and form to those we have used in the past to communicate with other parties.

B. Employees. Currently, the Company communicates with its employees and independent contractors using the telephone, email and in person. In the event of an SBD, the Company will assess which means of communications are still available and use the means closest in speed and form to those we have used in the past. Additionally, senior management will have access to alternative contact information for all employees so that they may be reached quickly during an SBD.

C. Regulators. JKC is currently a member of the National Association of Securities Dealers. The Company communicates with FINRA's District 8 office primarily by telephone, email and in person. In the event of an SBD, the Company will assess which means of communications are still available and use the means closest in speed and form to those we have used in the past.

XI. Critical Business Constituents, Banks and Counter-Parties.

A. Business Constituents. The Company has contacted its 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 JKC can continue its business relationship with them in light of an internal or external SBD. The Company intends to quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when needed because of an SBD to them or our Company. Our major service suppliers are: legal counsel – Enterprise Law Group, LLP, 3 First National Plaza, 70 W. Madison St., Ste. 740, Chicago, IL 60602, 312-578-0236 and accounting/audit functions -- Mark A. Thomson, Ostrow Reisin Berk & Abrams, Ltd., NBC Tower, Suite 2600, 455 North Cityfront Plaza Drive, Chicago, Illinois 60611-5555.

B. Banks. The Company has contacted its banks and lenders to determine if they can continue to provide the financing that we will need in light of an internal or external SBD. The bank maintaining our operating account is: Northern Trust, Paul Larson at 50 S. La Salle St. Chicago, Illinois 60675. If JKC's banks and

other lenders are unable to provide the financing needed, the Company intends to seek alternative financing immediately from alternative lending institutions.

XII. Regulatory Reporting.

JKC is subject to regulation by the SEC, FINRA and the State of Illinois. The Company now files reports with its regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, the Company will check with the SEC, FINRA, and other regulators to determine which means of filing are still available, 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.

XIII. Disclosure of Business Continuity Plan.

The Company discloses in writing a summary of its BCP to clients upon engagement posts the summary on our web site and mails it to clients upon request. Our summary addresses the possibility of a future SBD and how the Company plans to respond to events of varying scope. In addressing the events of varying scope, our 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) provides general information on our intended response. Our summary discloses the existence of back-up facilities and arrangements.

XIV. Updates and Annual Review.

The Company will update this plan whenever there is a material change to its operations, structure, business or location. In addition, JKC will review this BCP annually to modify it for any changes in our operations, structure, business, or location.