



## **Business Continuity and Disaster Plan**

---

Continued business operations are critical for PMB Capital Management LLC DBA Brookstone Financial (“Brookstone”). We will attain continued business operations by following our Business Continuity and Disaster Plan as follows:

### **Emergency Contact Persons**

Brookstone’s two emergency contact persons are: Seth Stewart, 502-550-6518, sstewart@brookstonefinancial.com and Sarah Stewart, 502-295-2099, stewartwoman@twc.com. These names will be updated in the event of a material change, and our Executive Representative will review them annually.

### **Firm Policy**

Brookstone’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 Brookstone’s books and records, and allowing our customers to transact business. In the event that Brookstone determines we are unable to continue our business; we will assure customers prompt access to their funds and securities.

### **Significant Business Disruptions**

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only Brookstone’s ability to communicate and do business, such as fire in our building, death or incapacitation of a principal. In the event Seth Stewart becomes incapacitated or upon their death, Sarah Stewart, will notify all critical business constituents as well as all regulators who have jurisdiction over the business of Brookstone within 24 hours. Sarah Stewart will make sure that the credit demands of Brookstone are met.

Notification shall be given to all clients of Brookstone within five (5) business days from the death or incapacitation of any key persons of Brookstone. Brookstone will be responsible for refunding any unearned pre-paid fees to Clients of Brookstone. 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, especially on the capabilities of the Client’s respective clearing firm.

Clients’ accounts will continue to be monitored by the third-party money manager(s) (“TPM”) in the event of any incapacitation or death of the principal of Brookstone.

### **Approval and Execution Authority**

Seth Stewart, Managing Member, is responsible for approving the plan and for conducting the required annual review. Seth Stewart has the authority to execute this BCP.

### **Plan Location and Access**

Brookstone will maintain copies of its BCP plan and the annual review, and the changes that have been made to it for inspection. An electronic copy of our plan is located in a secure location.

### **Business Description**

PMB Capital Management LLC DBA Brookstone Financial (“Brookstone”) was founded in 2013. Seth Stewart is 100% owner.

### **Office Location**

Brookstone’s main office is located at 2213 Allison Lane, Jeffersonville, IN 47130. Its main telephone number is 812-288-9000.

### **Alternate Physical Location**

In the event of an SBD, Brookstone will move business operations to 3018 Blue Sky Loop, Jeffersonville, IN. 47130. Its main telephone number is 502-550-6518.

### **Customers’ Access to Funds and Securities**

Brookstone does not maintain custody of customer’s funds or securities, which are maintained at our clearing firm, or by the Third-Party Money Manager’s custodian(s). In the event of an internal or external SBD, if telephone service is available, customers may access their funds and securities by contacting Charles Schwab & Co., Inc. 800-435-4000.

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

Brookstone maintains its primary electronic and hard copy books and records at 2213 Allison Lane, Jeffersonville, IN 47130. Brookstone backs up its electronic records daily on a web-based backup system in order to allow rapid resumption of the activities of Brookstone. In the event of an internal or external SBD that causes the loss of our records, Brookstone will recover them from our electronic back up.

### **Financial Operational Assessments**

#### **Operational Risk**

In the event of an SBD, Brookstone will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, critical banks, critical counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options Brookstone will include our telephone voice mail, and secure e-mail. In addition, Brookstone will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

#### **Financial and Credit Risk**

In the event of an SBD, Brookstone 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 compliance with any net capital requirements. We will contact our clearing firm, critical banks, to apprise them of our financial status. If Brookstone determines that we may be unable to meet our obligations to those counterparties 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 customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators.

### **Alternate Communications between Brookstone and Customers, Employees, and Regulators**

#### **Customers**

Brookstone now communicates with our customers using the telephone, e-mail, our Web site, fax, U.S. mail. In the event of an SBD, Brookstone will assess which means of communication are still available and use the means closest in speed and form 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**

Brookstone now communicates 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 and oral) to the means that we have used in the past to communicate with the other party.

### **Critical Business Constituents**

Brookstone has 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. Brookstone 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 Brookstone. Our major suppliers/vendors/affiliates are:

Company Name	City, State	Phone	Services provided
RIA Registrar, LLC	Arden Hills, MN	800-441-1219	Compliance consultant
Charles Schwab & Co., Inc.	Westlake, TX	800-435-4000	Custodian
American Funds	Indianapolis, IN	800-421-9900	Custodian
Morningstar	Covington, KY	877-626-3227	Sub-Advisor/TPM
Zacks	Chicago, IL	312-265-9236	Sub-Advisor/TPM
Justin Allen	New Albany, IN	502-627-0899	IT

### **Regulatory Reporting**

Brookstone is subject to regulation by Indiana state regulators and other jurisdictions where it may conduct business. We now file reports with our regulators using paper copies in the U.S. mail, and/or electronically using fax, e-mail, and the Internet. In the event of a SBD, Brookstone 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 to our previous filing method. In the event that Brookstone cannot contact our regulators, we will continue to file required reports using the communication means available to us.

**Disclosure of Business Continuity Plan**

Brookstone provides in writing a BCP disclosure to customers upon request.

**Updates and Annual Review**

Brookstone will review annually and update this plan whenever Brookstone has a material change to our operations, structure, location or business.

**Chief Compliance Officer Approval**

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

Signed: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

**Employee Acknowledgements**

I have received and understand this Business Continuity Plan.

Signed: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_