

First Integrity Capital Partners Corporation

Business Continuity Plan
Effective May 21, 2008

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Introduction

NASD Rule 3500 Series

As a result of our ever-changing and evolving world, it has become necessary for firms in the financial services industry to take steps to ensure their preparedness to meet customer needs and resume regular business operations in a timely manner in the event of a significant business disruption (“SBD”).

There are several types of SBDs varying in severity and scope that may occur on an internal or external level. An internal SBD, such as a fire in our building, would only affect the Firm’s ability to conduct its normal business. An external SBD, such as an earthquake, regional power outage, or terrorist attack, would affect the operations of several firms or the financial markets as a whole.

On April 7, 2004, the Securities and Exchange Commission (“SEC”) approved the new NASD Rule 3500 Series, which requires members to establish emergency preparedness plans and procedures. Rule 3510 requires each member to create and maintain a business continuity plan (“BCP” or “Plan”) and enumerates certain requirements that each plan must address. The Rule further requires members to update their BCPs upon any material change and, at a minimum, to conduct an annual review of their BCP. Each member also must disclose to its customers how its BCP addresses the possibility of a future SBDs and how the member plans to respond to events of varying scope.

Firm Policy

Our policy is to respond to an SBD in a manner that prioritizes the immediate safety of our employees, preservation of the Firm’s property, and a quick recovery in order to meet the business needs of our clients. If we determine that the SBD has been so catastrophic such that we are unable to continue our business, we will ensure that our clients have prompt access to their funds and securities.

Senior Management Approval of BCP

Pursuant to Rule 3510, First Integrity Capital Partners Corp. (FICP) is required to designate a member of senior management who is also a registered principal (“Designated Principal” or “DP”) to approve its BCP and be responsible for conducting the annual review of the Plan.

The designated principal responsible for approval and review of FICP’s BCP is Andrew J. Bloemers.

Physical location of and access to BCP

FICP will have a copy of its BCP, the annual reviews and the changes that have been made available for inspection. FICP's BCP will be maintained electronically on the Firm's computer system, and in hard copy at the personal residence of Andrew J. Bloemers.

Emergency contacts

Pursuant to NASD Rule 3520, FICP has designated Andrew J. Bloemers, also a registered principal as its emergency contact:

Andrew J. Bloemers, President

Primary – 561-820-9700

Cellular – 561-889-7368

Enrique Alvarez, Consultant

Primary- 770-263-7300

Cellular- 404-964-7276

Messrs. Bloemers and Alvarez will be available for FINRA to contact in the event of an SBD.

Customer disclosure

We disclose a summary of our BCP to our customers (Appendix #1) in hard copy at the time of account opening. The disclosure is also posted on our website and mailed to customers upon their request. Our disclosure addresses the possibility of a future SBD and how we plan to respond to SBDs of varying severity. Our disclosure describes various scenarios and the specific steps FICP will take to maintain or promptly and efficiently resume its business operations in the event of an SBD so as to minimize client impact.

Annual review and updates

Mr. Bloemers will be responsible for the annual review of FICP's BCP as well as updating the Plan in the event of a material change in the company's operations, structure, locations or policies.

Key Contact List

Certain key employees, as identified by the DP, may be provided access to the BCP. These individuals will be identified on the "Key Contact List" (Appendix #2) and will maintain copies of the BCP in designated locations outside the Firm's principal office location. The Firm will provide a copy of the Key Contact List to outside parties with which the Firm has business relationships such as banks, attorneys, accountants, consultants, equipment vendors, service

providers, etc. if it is determined that it would be important for such third parties to have this contact information in the event of a SBD.

BCP requirements pursuant to NASD Rule 3510

Data Back-up and recovery (hard copy and electronic)

It is possible that an SBD may result in the destruction of the Firm's primary books and records. Therefore, FICP has implemented a system of backing up such books and records including off-site storage of the back-ups. This system will ensure that in the event of an SBD, FICP will be able to regain access to the vital records necessary in maintaining its operations.

The Firm maintains a list of the books and records maintained in hard-copy and electronic formats (Appendix #3).

The Firm's primary hard copy and electronic books and records are housed in its main office in West Palm Beach, Florida. Mr. Bloemers is responsible for the maintenance and back-up of these records.

Hard copy books and records: All hard copy books and records will be scanned to a CD-R and transported offsite. All of the Firm's back-up hard copy books and records are stored at the personal residence of Andrew J. Bloemers:

110 Westminster
West Palm Beach, FL 33405

Electronic books and records: Electronic books and records are burned to non-erasable CD-R and transported offsite on a quarterly basis. These records are stored at the personal residence of Andrew J. Bloemers:

110 Westminster
West Palm Beach, FL 33405

In addition, duplicate CD-Rs are sent to a third party service provider in accordance with SEC Rule 17a-4(f):

Capital Markets Compliance[®], LLC (CMC)
3525 Holcomb Bridge Road
Norcross, GA 30092
770-263-7300

CMC is reasonably distant from the main office so as to reduce the chance that it too will be affected by the SBD, yet close enough to access quickly if the backup books and records become an immediate necessity. In the event that the Firm's back-up books and records are needed, Mr. Bloemers will be responsible for obtaining them and transporting them back to the main office if it is operational or to the alternate location if the main office is not operational.

All mission-critical systems

It is likely that in the event of a catastrophic SBD, one or more of the Firm's primary systems will be rendered useless. Therefore, the Firm has devised a plan that will allow it to manage a system outage in any of its mission-critical systems. FINRA defines a "mission-critical system" as "any system that is necessary, depending on the nature of a member's business, to ensure prompt and accurate order processing of securities transactions, including, but not limited to, order taking, order entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities." FICP expands that definition to include all of the systems on which the Firm relies for its regular, uninterrupted business operations. These systems are enumerated below:

Computer System:

Hardware and Service Description:

Computers and laptop are manufactured by Dell. Printers are manufactured by Hewlett Packard. Dell Computers run on Windows XP operating system and are equipped with Microsoft Office.

Log-in:

Computers are password protected. Access to the Bloomberg system is protected by Bloomberg's Bio-Metric thumbprint of Mr. Bloemers

Dial-up Access

The laptop computer has both dial up and wireless internet access. Internet Connection and the link to the clearing firm's systems are thru FDN DSL.

Communications System:

AT&T partner phone system is being used. The telephone has 3 separate incoming copper lines. Mr. Bloemers cell phone will be used as a backup should the primary phone system fail. Email is also used and is available on the laptop computer. The clearing firm will provide access to the client's accounts.

In the event of a SBD that renders the computer system useless, the Firm will obtain new computer equipment. That process is expected to take 24-48 hours.

Client account database:

FICP uses the internet to access all client account information, including account balances, positions, and transactions with its clearing firm. In the event that internet becomes inaccessible, we will communicate with the clearing firm via telephone or cell phone.

Order entry:

FICP uses Bloomberg to enter all orders for our clients. In the event that Bloomberg becomes inaccessible, we will contact the clearing firm directly.

Telecommunications:

FDN Communications
 2301 Lucien Way, #200
 Maitland, FL 32751
 (407) 447-6617

In the event that FICP's telecommunications system is disabled, we will rely on the cell phone as back up.

Power source:

FPL
 PO Box 025576
 Miami, FL 33102
 (561) 478-6399

In the event of a power outage, we will move operations to the private residence of Andy Bloemers at 110 Westminster, West Palm Beach, FL 33405 and if necessary utilize a generator.

| If disabled: | Alternative to the primary system | Down time during switch-over | Extent of potential liability (1-5 scale) |
|--|--|-------------------------------------|--|
| Client account database: | The Firm's clearing firm will be contacted and account information could be accessed by calling the clearing firm via cell phone | 1 hour | 2 |
| Order entry system: Bloomberg Anywhere | The Firm's clearing firm will be contacted and account information could be accessed by calling the clearing firm via cell phone | 1 hour | 2 |
| Telecommunications: FDN Communications | Cell phone back up with Sprint Communications | 1 hour | 1 |
| Computer system Dell and HP | Obtain new computer equipment | 24-48 hours | 2 |
| Power source: FPL | In case of power failure Mr. Bloemers owns a 5500 watt generator and has enough fuel on hand for 7 days of operation | 3hours | 3 |

Financial and operational assessments

FINRA defines “financial and operational assessments” as “a set of written procedures that allows a member to identify changes in its operational, financial, and credit risk exposures.” As demonstrated following the events of September 11, 2001, an SBD of great enough severity can expose a firm to several risk factors that can potentially put the Firm out of business or cause financial harm to its clients. It is important, in the face of an SBD, for the Firm to manage the risks that are specific to its business and take whatever steps possible to assure the least amount of impact on its clients.

Operational risk refers to a diminished ability for the Firm to maintain communications with its clients and access key records through its “mission critical systems”. In the event of an SBD, we will immediately identify what means of communication are still available to us. Although the effects of an SBD will determine the means of alternative communication, the communications options we will seek to employ will include the telephone, fax, voice-mail, email, and cellular telephones.

Financial risk refers to the Firm’s ability to generate revenue, obtain financing, and/or maintain sufficient equity. In the event of an SBD, we will determine the liquidation value of our investments and other assets in order to evaluate our ability to continue to fund our operations and remain in capital compliance. If a determination is made that we are unable to meet our financial obligations or continue to fund our business, we will request additional financing from our banks and/or other credit sources. If we cannot remedy a capital deficiency, we will file the necessary notices with FINRA immediately.

Credit risk is erosion in the Firm’s investments due to lack of liquidity in the market. The Firm may be subject to this type of risk in the event of an external SBD of catastrophic proportions such as the events of September 11, 2001. If a similar event were to occur again that is of great enough magnitude to close the markets, the likelihood that there would be a significant negative impact on stock prices is high. In such a case FICP will immediately assess the value of its investments and the liquidity in the market in order to determine its course of action. If we believe that the impact on the market is short-term in nature, we may choose not to liquidate positions. If we believe that the impact on the market is long-term, we will assess our ability to meet our capital obligations in a time of depressed market values. The result of that assessment may be a liquidation of some or all of the Firm’s investment positions.

Alternate communications between the Firm and its clients, employees and regulators

Clients

FICP currently communicates with its clients via telephone, cellular telephone, fax, email, U.S. mail, and personal meetings at the Firm’s main office or clients’ offices. In the event of a SBD, we will immediately assess the means of communications that are still available to us and seek to

use the means closest in speed and form to the means we have used in the past to communicate with our clients.

Employees

The Firm currently communicates with its employees via telephone and email, as well as in person. In the event of an SBD, we will assess which means of communication are most readily available to employ in communicating with our employees.

Regulators

FICP is currently a member of FINRA. We currently communicate with FINRA via telephone, email, fax, and U.S. mail. In the event of an SBD, we will assess which means of communication are most readily available to employ in communicating with FINRA. Pursuant to Rule 3520, FICP has provided FINRA with two emergency contact names and telephone numbers so that they will be able to contact us during an SBD. The following is information that may be vital in dealing with our regulators in the event of an SBD:

Firm information

Name: First Integrity Capital Partners Corp
CRD #: 146049

NASD – District 7 office

Tel - (561) 443-8000
Fax - (561) 443-7995

NASD – Washington, D.C.

(301) 590-6500

SIPC

(202) 371-8300 - phone
(202) 371-6728 – fax

SEC – Market Regulation

(202) 942-0069

Alternate physical location of employees

In the event that the main office becomes inoperable, the Firm will shift its operations to its alternate location, the primary residence of Mr. Bloemers located at

110 Westminster
West Palm Beach, FL 33405

This location is reasonably distant from the main office so as to reduce the chance that it too will be affected by the SBD, yet close enough to relocate to quickly if necessary. All of the Firm's employees have been provided with driving directions to this location. Should a larger regional business disruption occur, Mr. Bloemers will move the operation of the firm to his second residence located at:

17256 Buchannan Street
 Grand Haven, MI 49417
 616-842-7562

In the event that a SBD incapacitates the main office, the first priority will be the safety of the Firm’s employees. If it is possible to salvage equipment and books and records in a safe manner, all of the key components of the office will be removed and transported to the alternate location. In the event that everything in the office is destroyed or cannot be salvaged, Mr. Bloemers will be responsible for obtaining the backup books and records from the back-up location and transporting them to the backup location at which time business will resume.

Critical business constituent, bank, and counter-party impact

Critical business constituents

The NASD defines “critical business constituents” as “businesses with which a member firm has an ongoing commercial relationship in support of the member’s operating activities.” FICP has identified its critical business constituents as the following:

Capital Markets Compliance®, LLC
 Tel – (770) 263-7300
 Fax – (877) 600-1780

Bloomberg, L.P.
 Tel – (917) 369-5540

FDN Communications
 (407) 447-6617

Clearing Firm
 Southwest Securities, Inc.
 214-859-1800

FPL
 (561) 478-6399

Banks

The following is a list of banks with which we currently have relationships:

| Bank Name | Nature of relationship |
|------------------|-------------------------------|
| IronStone Bank | Operating account |

In the event of an SBD, we will determine if a need exists for further financing and if so, we will contact the banks with which we currently do business to seek such financing arrangements. If those banks are unable to provide the necessary financing, we will pursue alternative means of obtaining financing through the personal financial resources of the owners.

Counter-parties

FICP's counter-parties include other broker-dealers, institutional clients, and our clearing firm. In the event of an SBD that affects FICP and/or one or more of our counter-parties, it will be necessary to determine alternate means of transacting business with or through our counter-parties.

Regulatory reporting

As mentioned previously, FICP is subject to regulation by FINRA. The following is a list of reports we are required to file with FINRA and the manners in which we file:

| Report | Method of filing |
|------------------------------------|--|
| FOCUS reports | Via internet through our service provider, Capital Markets Compliance [®] , LLC |
| Financial statements to regulators | Via fax through our service provider, Capital Markets Compliance [®] , LLC |
| OATS, etc. | Clearing Firm |

In the event of an SBD, we will assess which means of transmitting regulatory reports are still at our disposal and work with the NASD to arrive at an acceptable temporary alternative if the normal methods have been disabled.

Prompt access to client funds and securities

Depending on the scope of an SBD many clients may decide to sell securities and/or withdraw funds from their brokerage accounts. FICP does not maintain custody of client funds and securities. Our clearing firm holds all accounts, funds, and securities. In the event of an internal or external SBD, FICP will employ any method still available (automated order entry system, telephone, fax, email, etc.) to communicate clients' orders and withdrawal requests to Southwest Securities, Inc. in a timely manner.

Potential SBD scenarios

In an effort to prepare for the variety of effects that different types of SBDs might have on FICP, we have outlined some scenarios and the actions that the Firm will need to take in order to assure that the SBD has the least possible effect on the Firm and its clients. We are aware that the exact ramifications of any type of SBD cannot be predicted precisely and in the event of an SBD, we will take the time to assess the Firm's particular resulting situation and take the necessary steps as described in our BCP to handle the situation as effectively as is possible under whatever the circumstances may be.

Illustration #1 – Internal SBD

In the event that a fire consumes FICP’s main office destroying all hardware and files, after assuring the safety of our employees, the following actions will be taken:

| Effect of SBD | Responsible Party | Action to be taken |
|--|--------------------------|---|
| Personal computers, servers, and data storage hardware are destroyed | Andrew J. Bloemers | Acquire new computers, transport them to alternate location, and install the necessary software obtained from off-site storage facility. Contact network service provider if necessary to re-establish technological infrastructure and web services. |
| Books and records are destroyed or partially destroyed | Andrew J. Bloemers | Assess the feasibility of recovering the damaged books and records. If more efficient, obtain back-up books and records from off-site facility and transport them for immediate use to the alternate location. |
| Office is destroyed | Andrew J. Bloemers | Relocate to the alternate location and establish operations. Once business has resumed and is fully operational, start searching for a new main office location. |
| Telecommunications hardware is destroyed | Andrew J. Bloemers | Contact service provider to transfer existing service to the alternate location, arrange for necessary hardware and software installations. |

We estimate the resumption of business and communications channels within forty-eight (48) hours of the onset of this type of SBD.

Illustration #2 – External regional SBD

In the event that an earthquake, or other natural disaster, causes structural damage to our building and the buildings of some of our service providers, including our clearing firm, FICP will make the following assessments and take the following steps:

| Effect of SBD | Responsible Party | Action to be taken |
|--|--------------------------|--|
| Building is not structurally sound | Andrew J. Bloemers | Evacuate the office and obtain alternate equipment and files and transport them to the alternate location so that business may resume promptly. |
| Clearing firm has been forced to relocate to their secondary business location | Andrew J. Bloemers | Contact the clearing firm and assess the repercussions of their relocation on FICP's business. Determine what method will be the most effective for delivering customer orders and requests for withdrawals. |
| Other vendors are experiencing service interruptions | Andrew J. Bloemers | Contact vendors to determine when they will be fully operational and make arrangements for the continuance of service, if possible, in the meantime. |

Depending on the impact of this particular type of SBD on our third-party vendors, we estimate a range of forty-eight (48) to seventy-two (72) hours for the Firm to be able to resume normal business operations.

Illustration #3 – Catastrophic SBD

In the event of an SBD on the level of a terrorist attack, major natural disaster, political crisis, or other event that is of a magnitude great enough to force the close of the markets but does not *physically* affect FICP, the Firm will take the following steps:

| Effect of SBD | Responsible Party | Action to be taken |
|---|--------------------------|--|
| The financial markets are closed | Andrew J. Bloemers | Communicate the situation to clients and assure that our clearing firm will be able to process transactions when the markets re-open. |
| One of FICP's banks has been significantly affected and cannot continue its business for a prolonged period of time | Andrew J. Bloemers | Contact the bank to determine how funds may be withdrawn and transfer the funds to another account. If funds are frozen for an uncertain amount of time, assess the Firm's financial situation and pursue additional financing if necessary. |
| The Firm's investments in the financial markets are frozen | Andrew J. Bloemers | Perform a risk assessment based on the overall status of the SBD to decide how to best |

| | | |
|---|--|--|
| | | preserve the Firm's capital position under a variety of market re-open scenarios. |
| There is a possibility of further SBDs resulting from the primary SBD | | Test the Firm's procedures for handling an SBD that results in the Firm's relocation. Assure that back-up systems, hardware, and files are ready to be utilized and can be set up quickly if needed. |

It is virtually impossible to predict a recovery time for this category of SBD due to the scope and the myriad of ramifications on the financial services industry as a whole. We are confident that with the procedures we have in place we will be able to ensure the least possible impact on our clients as dictated by the circumstances.

BCP Training and Education

The DP is required to ensure that all employees of FICP are aware of the Firm's BCP and are familiar with the appropriate procedures to follow in the event of an SBD. In consideration of the fact that the Firm's BCP may include particularly sensitive and/or confidential information about the Firm's business operations, it is possible that the BCP in its entirety may not be disseminated to every employee or associated person of the Firm. At the discretion of senior management, the DP may limit the delivery of certain portions of the BCP to the Firm's employees and associated persons.

Senior Management Approval of BCP

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

Signed: _____

Print Name: Andrew J. Bloemers

Title: President

Date: _____

Appendix #1

Client Disclosure Document

Appendix #2

Key Contacts List

Appendix #3

Books & Records List

Appendix #4

Back-up Facilities List

Appendix #5

Key Systems List

Appendix # 1
Client Disclosure Document
First Integrity Capital Partners Corp.

Business Continuity Plan Client Disclosure Document

Introduction

The purpose of this letter is to provide you with very important information about First Integrity Capital Partners Corp's ("FICP") Business Continuity Plan ("BCP") so that you are aware of what you need to do in the event that our firm experiences a significant business disruption ("SBD"). As a result of our ever-changing and evolving world, it has become necessary for firms in the financial services industry to take steps to ensure their preparedness to meet customer needs and resume regular business operations in a timely manner in the event of an SBD.

There are several types of SBDs varying in severity and scope that may occur on an internal or external level. An internal SBD, such as a fire in our building, would only affect the firm's ability to conduct its normal business. An external SBD, such as an earthquake, regional power outage, or terrorist attack, would affect the operations of several firms or the financial markets as a whole.

On April 7, 2004, the Securities and Exchange Commission ("SEC") approved the new FINRA Rule 3500 Series, which requires members to establish emergency preparedness plans and procedures. Rule 3510 requires each member to create and maintain a BCP and enumerates certain requirements that each plan must address. The Rule further requires members to update their BCPs upon any material change and, at a minimum, to conduct an annual review of their BCP. Each member also must disclose to its customers how its BCP addresses the possibility of a future SBDs and how the member plans to respond to events of varying scope.

Firm Policy

Our policy is to respond to an SBD in a manner that prioritizes the immediate safety of our employees, preservation of the firm's property, and a quick recovery in order to meet the business needs of our clients. If we determine that the SBD has been catastrophic to the level that we are unable to continue our business, we will ensure that our clients have prompt access to their funds and securities.

Alternate office location

In the event that the main office becomes inoperable, the firm will shift its operations to its designated back-up facility which is reasonably distant from the main office so as to reduce the chance that it will be affected by the same SBD, yet close enough to relocate to quickly if necessary. All of the firm's employees are familiar with the back-up facility and have been provided with driving directions.

Back-up books and records

FICP maintains back-ups of all its client files and other internal books and records at an off-site facility. Should an SBD cause our primary records to be inaccessible or destroyed, we have procedures in place to

access the back-up files and implement them promptly in order to assure the least possible impact on our clients.

Third party business relationships

FICP has business relationships with several entities upon which we rely for varying services. Such entities include our clearing firm, banks, telecommunications providers, etc. We have contacted our essential third parties to assess the impact that varying types of SBDs may have on the services we are provided by them. Based on that information we have been able to develop alternate plans to counter any interruptions in these services that we may experience during an SBD.

Key systems

The firm has identified the possibility of a loss of functionality of the systems relied upon for its regular business operations in the event of an SBD. We have enumerated our key systems in our BCP, identified the individual(s) responsible for them, and developed procedures to switch to alternative systems should our primary systems be incapacitated. Based on the trial conversions we have run, we expect minimal down time if a situation arises which forces us to switch to our alternate systems.

In an effort to prepare for the variety of effects that different types of SBDs might have on FICP, we have outlined some SBD scenarios and the corresponding actions that the firm will need to take in order to assure that the SBD has the least possible effect of the firm and our clients. We are aware that the exact ramifications of any type of SBD cannot be predicted precisely and in the event of an SBD, we will take the time to assess the firm’s particular resulting situation and take the necessary steps as described in our BCP to handle the situation as effectively as is possible under the circumstances we encounter.

Potential SBD Scenarios:

Illustration #1 – Internal SBD

In the event that a fire consumes FICP’s main office destroying all hardware and files, after assuring the safety and well-being of our employees, the following actions will be taken:

| Effect of SBD | Action to be taken |
|--|---|
| Personal computers, servers, and data storage hardware are destroyed | Acquire new computers, transport them to alternate location, and install the necessary software obtained from off-site storage facility. Contact network service provider if necessary to re-establish technological infrastructure and web services. |
| Books and records are destroyed | Obtain back-up books and records from off-site facility and transport them for immediate use to the alternate location. |
| Office is destroyed | Relocate to the alternate location and establish operations. Once business has resumed and is fully operational, start searching for a new main office location. |

| | |
|--|---|
| Telecommunications hardware is destroyed | Contact service provider to transfer existing service to the alternate location, arrange for necessary hardware and software installations. |
|--|---|

We estimate the resumption of business and communications channels within forty-eight (48) hours of the onset of this type of SBD.

Illustration #2 – External regional SBD

In the event that an earthquake or other natural disaster causes structural damage to our building and the buildings of some of our service providers, including our clearing firm, FICP will make the following assessments and take the following steps:

| Effect of SBD | Action to be taken |
|--|---|
| Building is not structurally sound | All vital equipment and files will be transported to the alternate location and business will resume promptly. If the equipment and files are damaged beyond use, new equipment (as necessary) shall be obtained and the firm's back-up files shall be retrieved from its off-site storage facility(s). |
| Clearing firm has been forced to relocate to its secondary business location | Contact the clearing firm and assess the repercussions of its relocation on its business. Determine which method will be the most effective for delivering customer orders and requests for withdrawals to the clearing firm. |
| Other vendors are experiencing service interruptions | Contact vendors to determine when they anticipate being fully operational and make arrangements for the continuance of service, if possible, in the meantime. |

Depending on the impact of this particular type of SBD on our third-party vendors, we estimate a range of forty-eight (48) to seventy-two (72) hours for the firm to be able to resume normal business operations.

Illustration #3 – Catastrophic SBD

In the event of an SBD on the level of a terrorist attack, major natural disaster, political crisis, or other event that is of a magnitude great enough to force the close of the markets but does not *physically* affect FICP, the firm will take the following steps:

| Effect of SBD | Action to be taken |
|---|--|
| The financial markets are closed (other than normal market holidays) | Communicate the situation to clients and assure that the clearing firm will be able to process transactions when the markets re-open. |
| One of FICP's banks has been significantly affected and cannot continue its business for a prolonged (more than seventy-two hours) period of time | Contact the bank to determine how funds may be withdrawn and transfer the funds to another account. If funds are frozen for an uncertain amount of time, assess the firm's financial situation and pursue additional financing if necessary. |

| | |
|---|--|
| The firm's investments in the financial markets are frozen | Perform a risk assessment based on the overall status of the SBD to decide how to best preserve the firm's capital position under a variety of market re-open scenarios. |
| There is a possibility of further SBDs resulting from the primary SBD | Test the firm's procedures for handling an SBD that results in the firm's relocation. Assure that back-up systems, hardware, and files are ready to be utilized and can be set up quickly if needed. |

It is virtually impossible to predict a recovery time for this category of SBD due to the scope and the myriad of ramifications on the financial services industry as a whole. We are confident that with the procedures we have in place we will be able to ensure the least possible impact on our clients as dictated by the circumstances.

Important Contact Information

First Integrity Capital Partners Corp.
Address 330 Clematis Street, Suite 250, West Palm Beach, FL 33401
Tel: 561-820-9700
Fax: 561-655-6960
Website TBD

CLEARING_FIRM: Southwest Securities, Inc.
Address: 1201 Elm St., Suite 3500, Dallas, TX 75270-2180
Tel: 214-859-1800
Fax: 214-859-6077

For Additional Information About Our BCP

Should you have any questions in relation to our BCP or this notice, please don't hesitate to contact us at any time.

Summary

At FICP we deeply value the relationships we have built with our clients and we strive to meet their changing needs in any business climate. It is not the intent of this document to assure our clients that there will be no impact on them whatsoever in the event that FICP is affected by an SBD. Rather, we wish to convey the fact that we have developed procedures for varying types of possible SBDs which will allow us to address the effects on our firm on a variety of levels, manage those effects, and utilize our alternate arrangements in a manner that we expect will minimize client impact. In our procedures, we stress the importance of maintaining communications with our clients through as many media as possible so that we may continue to meet their needs and transact business in as smooth a fashion as is possible under whatever circumstances may have arisen.

Appendix # 2

Key Contacts List

| Contact Individual | Title | Description of Job Functions | Primary Office Phone | Primary Office Fax | Primary Office Address | Email |
|---------------------------|------------|--|----------------------|--------------------|---|--------------------------|
| | | | Alternate Phone | Alternate Fax | Alternate Address | |
| <i>Andrew J. Bloemers</i> | President | Oversees operations of the firm | 561-820-9700 | 561-655-6960 | 330 Clematis Street Suite 210 West Palm Beach FL 33401 | Rottweiler@bloomberg.net |
| | | | 561-889-7368 | 877-600-1780 | 110 Westminster West Palm Beach, FL 33405 | |
| <i>Enrique Alvarez</i> | Consultant | Provides general compliance & business consulting services | 770-263-7300 | 877-600-1780 | 3525 Holcomb Bridge Road Norcross, GA 30092 | rick@cmcompliance.com |
| | | | 404-964-7276 | 561-655-6960 | | |
| | | | | | | |
| | | | | | | |

Appendix # 3

Books & Records List

| Introducing or Clearing Broker/Dealer Records | Hard Copy | Electronic | N/A |
|--|--|--|--|
| Trade (a.k.a. Purchase and Sales) blotter | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Cash received/forwarded blotter | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Checks received/forwarded blotter | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Securities Received/Delivered blotter | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Securities borrowed and securities loaned ledger | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Moneys borrowed and moneys loaned (together with a record of the collateral therefore and any substitutions in such collateral) ledger | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Securities failed to receive and failed to deliver ledger | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| All long and all short securities record differences ledger | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Repurchase and reverse repurchase agreements ledger | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Long and short position ledger | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Proprietary Order tickets or other record of buy/sell instructions (executed or not) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Customer Order tickets or other record of buy/sell instructions (executed or not) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Confirmations of Customer transactions | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Cash/Margin requirements | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Options positions | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Lost or stolen securities records | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Records for "internal b/d system" customer access | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Client cash and margin account ledgers | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Firm cash and margin account ledgers | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Securities in transfer ledger | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Advertising/Sales Literature Pieces <ul style="list-style-type: none"> • Radio Broadcast Transcripts • Audio/Video tape transcripts and Copies • Newspaper copy • Etc. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> |
| All internal and public communications sent/received <ul style="list-style-type: none"> • Email • Instant Messaging • Hard-copies | <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| Customer account info. (New Account Records) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Dividends and interest received ledger | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| OATS files | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| SEC Rule 11Ac1-5 Market Maker Order Routing Records | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| SEC Rule 11Ac1-6 Order Routing Venue Records | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| TRACE Participant Agreements | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| TRACE Submission files (if prepared and reported/transmitted internally) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| Accounting Records | Hard Copy | Electronic | N/A |
|---|-------------------------------------|-------------------------------------|--------------------------|
| Bank statements | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Brokerage statements | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Check register | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Copies of all checks written on all accounts | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Account reconciliations of all accounts | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Accounting System backup files (if electronic system is used) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Balance sheet | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Income Statement | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Net Capital Comp. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Chart of accounts | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| General ledger | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| General journal | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Trial balance | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Cash disbursement journal | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Cash receipts journal | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Payroll files | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Annual audit info. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Bills received and paid (vendors) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| Company Records | Hard Copy | Electronic | N/A |
|---|-------------------------------------|--------------------------|-------------------------------------|
| Operating agreement (if LLC) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Articles of organization (if LLC) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Articles of incorporation (if corporation) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Bylaws (if corporation) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Company minutes | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Partnership Agreement (if Partnership or Limited Liability Partnership) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Form BD | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| SIPC registration records | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Fidelity bond record | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Lease and sublease agreements | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other Insurance binder documents | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Errors and Omissions | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Directors and Officers | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Surety Bond | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Health Insurance | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| Employee Records | Hard Copy | Electronic | N/A |
|--|-------------------------------------|--------------------------|--------------------------|
| RR employment records <ul style="list-style-type: none"> • Form U4s | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | |
|---|---|--|--|
| <ul style="list-style-type: none"> • Form U5s • Associated Persons Compensation Records • Associated Person Location and Identification Number Records • Investigation of prior employment • Credit report/background check, if applicable | <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| Non-registered persons employment records | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Associated persons' fingerprint records | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Appendix # 4

Back-up Facilities List

| Physical Address | Contact Person | Phone | Fax | Email | Directions from Home Office |
|--|-----------------------|--------------|--------------|--------------------------|-------------------------------|
| 110 Westminster West Palm Beach, FL 33405 | Andrew J. Bloemers | 561-889-7368 | 561-655-6960 | Rottweiler@bloomberg.net | See Mapquest Directions |
| 17256 Buchanan Street Grand Haven, MI 49417 | Andrew J. Bloemers | 616-842-7562 | | Rottweiler@bloomberg.net | Located in Grand Haven MI. |
| | | | | | |
| | | | | | |

Appendix # 5

Key Systems List

