

# **Quad-Cities Investment Group, LLC**

## **Business Continuity Plan (BCP)**

### **I. Emergency Contact Persons**

Our firm's emergency contact person is:

Scott L. Stoltenberg, Partner and Chief Compliance Officer

5177 Utica Ridge Road  
Davenport, IA. 52807  
Phone: (563) 528-4391

### **II. Firm Policy**

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business.

Mr. Stoltenberg is responsible for approving the plan and for conducting the required annual review. Mr. Stoltenberg has the authority to execute this Business Continuity Plan.

If in the event of a major catastrophe of the Davenport office, the following procedures will go into effect.

Upon arrival at 5177 Utica Ridge Road, any staff member should ascertain the condition of the office due to a major catastrophe and make the decision to immediately begin notifying other staff members via cell phone and proceed to the Disaster Recovery Office ("DRO" – see Section V for actual address). If the staff member is not sure to the extent of, or consequences of, the catastrophe, that staff member should contact a member of the senior management immediately or wait for them to arrive.

### **III. Business Description**

Quad-Cities Investment Group, LLC is an Investment Advisory firm involved in the financial management of client accounts.

Our clearing firm is Raymond James Financial Services, Inc. – 880 Carillon Parkway  
St. Petersburg, FL 33716

Raymond James Financial Services, Inc.'s Phone Number is: 800-248-8863

#### **IV. Office Locations**

Quad-Cities Investment Group, LLC has its offices located in Davenport, IA. Our employees may travel to this office by means of foot, car, bus or taxi. We engage in order taking and entry at this location.

#### **V. Alternative Physical Location of Employees**

In the event of an SBD, we will move our trading desk operations to the following site:

2450 Hunter Rd.  
Bettendorf, IA 52722

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

Our firm does not maintain custody of customers' funds or securities. Raymond James Financial Services, Inc. does hold our clients funds or position. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf.

#### **VII. Data Back-up and Recovery (Hard Copy and Electronic)**

Our firm maintains its primary books and records and its electronic records in our Davenport office.

Our firm maintains its back-up of its electronic and hard copy materials at

2450 Hunter Rd.  
Bettendorf, IA 52722

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

#### **VIII. Financial and Operational Assessments**

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our Web site ([www.quadcityinvestmentgroup.com](http://www.quadcityinvestmentgroup.com)), telephone voice mail, and secure email. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

In the event that Quad-Cities Investment Group, LLC is put in a position to raise funds due to a credit issue, the firm will apply for a loan or credit line through one of the banking institutions it currently uses.

**IX. Mission Critical Systems**

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, 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.

**Internet Connection**

Our DRO has an internet connection that will enable the trading desk to access the Fiserv system as well as the website of our clearing firm and regulators. Our internet carrier is Windstream Communications.

**DRO Telephone System**

Quad-Cities Investment Group, LLC has a telephone system in place at the DRO office that our trading office phones can be transferred to in the event of a SBD.

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

Our critical business constituents, banks, etc. will be contacted by Mr. Stoltenberg, Member and Chief Compliance Officer from his residence.

**X. Disclosure of Business Continuity Plan**

We provide in writing a BCP disclosure statement to customers upon request. We also make available the disclosure statement on our Website.

**XI. Updates and Annual Review**

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will test and review the BCP bi-annually with an outside data services firm or service provider to test and modify it for any changes.

**XII. Senior Management Approval**

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

Signed:   
Title: Partner and Chief Compliance Officer  
Date: 10/29/13

