

BUSINESS CONTINUITY PLANS OF
SPIRE INVESTMENT PARTNERS, LLC

December 2016

<u>Section:</u>	<u>Page:</u>
I. Firm Policy	2
II. The Team	2
III. Defining the Levels of Disaster	3
Level 1	3
Level 2	5
Level 3	5
IV. Business Description	5
V. Office Locations and Employees in Charge	6
VI. Data, Back-Up and Recovery	6
VII. Alternate communications	8
A. Customers	8
B. Employees	8
C. Regulators	9
VIII. Regulatory Reporting	9
IX. Critical Business Constituents	10
A. Key Business Partners	10
B. Banks	11
C. Counter-Parties	11
X. Review and Testing	11
XI. Disclosure	12
XII. Approval of the Plan	12

Business Continuity Plan
Of
Spire Investment Partners, LLC
(Spire Securities, LLC and Spire Wealth Management, LLC)

Spire Investment Partners, LLC (“Spire”) has devised the within Business Continuity Plan (“BCP”) in order to effectively address and state the specific steps which we shall use and employ in order to recover from any disaster or emergency.

I. 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. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

II. The Team – Emergency Contact Persons

The management team of Spire (Sue McKeown, Steve Donald, William Chao and Allen Eickelberg) is ultimately responsible for the implementation and maintenance of the BCP.

Directly responsible for certain actions and implementation of the plan are the following:

- Steve Donald and Allen Eickelberg are responsible for Technology and Communications - Phone: 703-748-5818 or 703-748-5812, email: SDonald@SpireIP.com or AEickelberg@spireip.com.
- Sue McKeown (CCO) is responsible for Compliance - Phone: 703-657-6062, email: Sue.McKeown@SpireIP.com.
- William Chao is responsible for Operations - Phone: 703-657-6063, email: WChao@spireip.com.

These names and contacts will be updated, within these BCPs and also on FINRA’s Contact System, promptly (within 30 days) in the event of a material change, and will be reviewed/confirmed at least annually.

This plan addresses the requirements of the Reston VA (Home office)/OSJ of Spire. Each branch office will need to modify in order to address their particular situation. A

copy of this plan will be maintained on our secure network in the SpireOps folder. The customer disclosure of our BCP is located on our website, www.SpireIP.com and our Intranet site.

It will be the responsibility of the Management Team to define the level of the Disaster (i.e. Level 1, Level 2, Level 3).

III. Defining the Levels of Disaster

Level 1: The least severe; *Significant Business Disruptions* (“SBDs”) or short term, internal disruptions that cause our building to be unavailable for time frames of less than one month. The following is a list of possible causes: power outages, broken HVAC, weather related issues or evacuations. To deal with this we would operate at a remote location. Remote locations include the McLean office, our homes, a suite in another professional’s office, or a suite/ballroom at a local hotel. Employees are to check in with management via their home phone or cell phone to be informed of place of operation. Vital equipment will be transported to site if possible or borrowed or leased at the location of operation. This would be the plan in place when dealing with inclement weather and other temporary, non-life threatening occurrences.

From Reston VA – Operations Home Office

1. An email alert will go out over the Spire system notifying all effected personnel of the issues at hand and provide for further instruction. This email alert will be sent by a member of Spire management (David Blisk, Sue McKeown, William Chao or Steve Donald). If necessary, instructions will be given to an alternate (Allen Eickelberg – McLean Office) to deliver the email to Spire Nationwide. The contents of that notification email will be as follows:

**** Due to the current interruption that has taken place in our Reston Operations Center, Spire is instituting our Business Continuity Plans. For trading or other urgent operational matters, please contact Allen Eickelberg at 703-748-5812 or AEickelberg@Spireip.com who will then forward the message to the appropriate party. Once service has been restored in Reston, you will be notified via email. ****

This same message will be posted to our External IT Home Page.

2. Should we be unable to run operations for more than one day, a recorded message will be added to our main phone lines with information and further instructions. Personnel will be provided with instructions as to how to forward their office phone calls to another phone.
 - i. Spire Reston personnel will have their office phones forwarded to their cell phones (or leave a message to contact by call for any

- emergencies). Our contact in McLean, Allen Eickelberg, will communicate any messages directly to Spire Operations via cell phone.
- ii. Information on programming your phones will be maintained on the Spire Intranet site. The program providing the ability to remotely re-program the main phone system will be with Allen Eickelberg and Steve Donald.
3. An emergency contact list of all Spire associates and affiliates is maintained by specific personnel which will include home phone numbers, cell phone numbers and emergency contact information.
- i. This emergency contact list will be maintained and kept updated by Natalia Jeraskova – and can be found in the Spire Ops folder on the “H” drive. This list is intended for internal use only.
4. A message may be added to our SpireIP.com website and the External IT home page with information and further instructions. This message will be added at the instruction of Steve Donald to either Allen Eickelberg or External IT.
- i. The information provided will include how to access client account information. How to trade for client accounts.

Message: “Reston Operations is currently experiencing a service interruption. Our Business Continuity Plans have been implemented.

- a. Clients: Please contact your investment advisor for more information”.**
 - b. IARs/RRs: Please contact Allen Eickelberg at 703-748-5812 or AEickelberg@spireip.com for service/trading issues.**
5. Mission Critical Functions, Systems and Activities – External IT, our network and internet access provider have made it possible to access our data server and email system from remote locations. If the physical office is uninhabitable, staff will be asked to go to the remote location where they can then access all necessary programs remotely. If it appears that this event will last for more than one day – our back up location will be the McLean branch office where we will resume operations as necessary.
6. Sue McKeown will be responsible for notifying our vendor partners, custodians and regulators, if necessary of any change in business operations.
7. As with this level of disaster we do not anticipate any long term disruption (no more than 2 days) other third party service providers or vendors may not necessarily be notified. If closed USPS and overnight delivery firms will simply “hold” and attempt to redeliver at a later date.
8. Once again, as this should be a temporary situation we do not expect to have to put into place any contingency budgets to maintain operations. A review of our existing insurance coverage may be in order.

Level 2: Intermediate-term disruptions that cause our building to be unavailable for a time frame of more than a month and less than a year. The following is a list of possible external causes: fire, contamination, flood damage, or building structural problems. If we do not know the magnitude at the time of the event, we will utilize plan A, above until it is clear that the time frame will exceed one month. If it is not possible to occupy the McLean branch for this extended period of time, we will lease temporary space from a business associate or through a commercial realtor. All equipment and files will be moved or replaced and phone lines will be transferred to the new location. Once our building is back online everything will be moved back if the situation warrants.

Level 3: Permanent loss of use of building – The following is a list of possible external causes: fire, flood, or terrorist attack. At the time of the event, we should know the severity of the damage and would go right to plan B and find new permanent space.

Plan “B”

If the city is destroyed or rendered uninhabitable, management will choose two evacuation locations. Depending on the scope of the event, the first evacuation location will be that of the McLean office (7901 Jones Branch Dr., #800, McLean, VA). An alternative location may be one of our other branch offices (see listing below). We have either created procedures or structured our operation to protect our asset management data, financial data and other important documents. However, some less important data may have to be reconstructed.

- **Operational Risk:** In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. In addition, if necessary, we will retrieve our key activity records as described in the section below, Data Back-Up and Recovery (Hard Copy and Electronic). As most all of this data is housed off-site, conversations regarding the safety and security of that data will need to take place as soon as possible with our vendors (i.e. External IT).
- **Financial and Credit Risk:** In the event of an SBD, we 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 capital compliance. We will contact our clearing firm and critical banks, to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties 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 and immediately take appropriate steps.

***** Currently, as we hold no client assets and our capital requirements are more than satisfactory, we do not anticipate this as a likely event. *****

IV. Business Description

Our firm is an introducing firm and does not perform any type of clearing function for ourselves or others. Our firm does not maintain custody of customers' funds or

securities; they are maintained at our clearing/custodian firms, NFS, Fidelity, Schwab and Pershing. 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, and if our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting the custodians via a Spire Ops representative or the custodian directly. The firm will make this information available to customers through our disclosure policy.

We accept and enter orders. All transactions are sent to our clearing firm, or other broker-dealers, which executes and clears our orders. Our clearing firms, and the other custodians also maintain our customers' accounts, can grant customers access to their accounts, and deliver funds and securities.

V. Office Locations and Employees in Charge

- 6701 Democracy Blvd., #300, Bethesda, MD 20817 – Phone: 301-571-9447 Chuck Alba 240-461-3090 Donna Dettling 301-467-0423
- 302 Corporate Dr. E, Langhorne, PA 19047 – Phone: 215-550-6210 Bill Springer 215-859-1621, Larry Luff 215-962-8553
- 7901 Jones Branch Dr., #800, McLean, VA 22102 – 703-748-5800 Steve Donald 301-642-8116, Allen Eickelberg 703-598-3466
- 1840 Michael Faraday Dr., #105, Reston, VA 20190 – 703-657-6060 Sue McKeown 703-627-8737, Steve Donald 301-642-8116
- 6507 Wilkins Ave., #211, Pittsburgh, PA 15217 – 412-404-2591 Norm Bloom 412-855-5905, Steve Receski 724-989-6735
- 100 Stony Brook Ct., Newburgh, NY 12550 – 845-563-0537 Steve DiGregorio 845-527-0400
- 21800 Beallsville Rd., Barnesville, MD 20838 – 301-428-8191 William Price 240-997-6776, Cherry Price 240-676-7923
- 19 Ludlow Rd., #302 Westport, CT 06880 – 203-557-4930 Rich Eller 203-249-0314, Candy Dileo 203-372-8186
- 3940 Lewis Speedway, #2201, St. Augustine FL 32080 – 904-209-4017 Owen Schrum 904-806-0417, Mary Atkinson 904-377-5804
- 2301 Dupont Dr., #460, Irvine, CA 92612 – 949-553-0313 Dana Kiley 949-333-1946
- 99 Park Ave #1600, New York, NY 10016 212-286-9146, Matt Ludmer 917-513-1419, Michelle Porter 609-221-5498

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

As we utilize an offsite 3rd party network provider (External IT), the safety and security of our stored data is assured, should our facility become unusable or destroyed. Our desktops, scanners, printers, copiers, and fax machines could be moved or replaced without disruption to our stored data. Our phone system is relatively simplistic and could be moved within hours and our phones can be forwarded within a fraction of that time. The rest of our office equipment is generic and can be readily replaced.

Our firm maintains its primary books and records electronically at:
1840 Michael Faraday Dr., #105, Reston, VA 20190

These items include:

- Bank reconciliations
- Accounts Receivable/Accounts Payable
- Commission/Fee calculations and payouts
- Account records, account statements, trade tickets/confirmations
- HR Records
- Registration files
- Contracts

These are maintained electronically via:

- Quickbooks files (ie Bank Rec., A/R, A/P, Payroll) are stored with External IT
- Commission/Fee calculations will be stored by our vendor, Fetter Logic/Quadron, First Rate, Envestnet.
- HR Records and Registration files are scanned and stored with External IT
- Regulatory form filings will be maintained electronically with Web CRD and also a scanned copy with External IT.
- All client account records (ie New account forms, contracts, correspondence) will be scanned into a Laserfiche application (ADI) and the records stored at External IT
- Email correspondence is stored with External IT and an additional copy is being sent, scanned and archived by a third party vendor (GlobalRelay) for 5 years.

Sue McKeown (CCO, 703-657-6062) is responsible for the maintenance of those books and records that apply to customer documents, Registration files and Regulatory filings. HR Records, commissions and fees will be the responsibility of Stuart Brawley (our Controller and FinOP, 703-657-6065). Stuart will be responsible for the maintenance of the books and records as they relate to Bank Reconciliations, FOCUS filings, A/R and A/P and Payroll.

Our firm maintains some of its back-up hard copy of customer statements (in CD format) at 1840 Michael Faraday Dr., #105, Reston VA 20190. Sue McKeown (703-657-6062) is responsible for the maintenance of these back-up books and records. Of course our clearing firms will also have maintained back ups of these records.

Our vendors (Fetter Logic, ADI/Laserfiche, GlobalRelay, McDonald Information Systems, External IT) back up their electronic records daily. Detail on these processes can be found in their contract files, copies of which are also stored electronically.

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.

Currently all order entry is via the web with our custodians..

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking and entry. Our clearing firm provides, through contract, the 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.

Copies of the BCPs of our clearing firms will be kept electronically by the CCO.

Order Taking

Currently, our representatives receive orders from customers via telephone or during client visits. During an SBD, either internal or external, we will continue to take orders, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by email if phone service is not available.

VII. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using telephone, e-mail, fax, U.S. mail, and in person visits at our firm or at the client's location. 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 or oral) to the means that we have used in the past to communicate with our customers. 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.

B. Employees

Our employees are our most valuable resources. We make every effort to protect them from harm at the workplace and to retain them. In the event of a disaster the staff is informed to check in with one of the managers to receive instructions. We would hire carefully screened temps and subcontract out non-confidential work in the event of loss of large number of employees (as in the case of a pandemic outbreak). Any management team member could be replaced by hiring a combination of consultants and other professionals.

David Blisk is the owner (with his wife Brenda) and CEO of Spire Investment Partners. Should David become incapacitated or otherwise unable to function in this capacity, the day to day operations of Spire would not be effected. There are no functions and or

systems that are solely reliant on David. Long term, Brenda Blisk, as part owner, would determine Spire's future.

We now communicate with our employees using the telephone, e-mail, our Intranet site 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 or oral) to the means that we have used in the past to communicate with our employees and representatives. We will also employ a call tree so that senior management (Supervising Principals) can reach all employees quickly during an SBD. The confidential call tree includes all staff home and office phone numbers.

The person to invoke use of the call tree is: Sue McKeown, CCO

C. Regulators

We are currently members of FINRA, NFA, State of Virginia, MSRB and registered with the SEC. We communicate with our regulators using phones, e-mail, fax and USPS. In the event of an SBD, Sue McKeown, the CCO will assess which means of communication are still available to us 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.

FINRA Contact (District Office):

Phone: 212-665-1180

E-Mail: Teresa.Evans@Finra.org

Fax: 215-496-0434

Mail: 1835 Market St., #1900, Philadelphia, PA 19103

SEC (Regional Office)

Phone: 202-942-8088

Mail: 100 F St., NE, Washington, DC 20549

(District Office)

701 Market St., Suite 2000, Philadelphia, PA 19106

Phone: 215-597-0649

State of Virginia

Phone: 804-371-5120

Mail: Securities – Franchises

State Corporation Commission

1300 East Main Street

Richmond, VA 23219

MSRB

Phone: 202-838-1500

Mail: 1300 I St., NW, Suite 1000

Washington, DC 20005

VIII. Regulatory Reporting

Our firm is subject to regulation by FINRA, SEC, State of Virginia and MSRB. We now file most reports electronically with our regulators. In the event of an SBD, we will

check with the SEC, FINRA and MSRB 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 we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

**** See Regulator Contact information in previous section****

We would make every effort to remain in compliance in the event of a disaster. Spire does not custody any customer funds or securities. This responsibility lies with the qualified custodians, or clearing firms, that we place accounts with. Should it be necessary to trade in any of our client accounts, access to trading desks is made available via web access or by phone.

Having client accounts custodied at 3rd party clearing firms also means that client statements and other documents could be recreated by the custodian. Most all of our paper files have been converted to a digital format. Passwords protected and back up by External IT.

IX. Critical business Constituents, Banks and Counter-Parties

A. Key business constituents include:

External IT

Phone: 1-866-583-8911

E-Mail: helpdesk@externalit.com

Fetter Logic

Phone: 303-675-1030

E-Mail: appsupport@fetterlogic.com

National Financial Services: 200 Seaport Blvd., Mail Zone Z2L, Boston, MA 02210

Phone: Mike Burke 617-563-9211, FAX 617-850-8045

E-Mail: michael.s.burke@fmr.com

RimPacific (Landlord/Management Co.): 7918 Jones Branch Dr., #850, McLean, VA 22102

Phone: 703-847-5700

Chevy Chase Land Company (Landlord/Management Co.): 8401 Connecticut Ave PH, Chevy Chase, MD 20815

Phone: Daren Dean 301-654-2690 ext.316

E-Mail: djd@cclandco.com

Cocke, Szpanka & Taylor, CPAs, PC (CST Group/Independent Auditors): 10740

Parkridge Blvd., 5th Floor, Reston, VA 20191

Phone: 703-391-2000, FAX: 703-391-2580

E-Mail: hkampff@cst-cpa.com

E&O Pros (Insurance Providers)
Attn: Tom Neja – Phone: 949-525-9113
806 E. Ave., Pico, #1-331, San Clemente, CA 92673

Schwab Institutional: 8045 Leesburg Pike, Suite 210, Vienna, VA 22182
Phone: Dennis Parlante 703-506-2674, FAX 703-506-8362
E-Mail: dennis.parlante@schwab.com

Fidelity: 100 Front St, Suite 530, West Conshohocken, PA19428
Phone: Steven Fox: 617-832-8487/ FAX 508-303-4288
Service Team: 800-523-7166 (12130)
Email: Stephen.fox@fmr.com

Pershing: Jersey City, NJ
Phone: PAS – James Lyons (201-536-7010) email: jalyons@pershing.com
DBS – Andy Forminio (201-413-2373) email: AForminio@pershing.com

We will contact our critical business constituents and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangement 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.

We do not utilize any third party vendors that are so unique that they could not be replaced with a competitor. The only quasi third parties that would cause us great disruptions are companies that make up the infrastructure of the country. If the banking system, mail system, communications networks, security markets or federal government were rendered inoperative for any great length of time we would not be able to operate. We do not have the size of resources to provide these services ourselves.

B. Banks:

Bank of America: 8300 Greensboro Dr., Ste L3, McLean, VA 22102
Phone: 703-663-2907/ 800-432-1000

C. Counter – Parties:

Counter-parties are all business affiliates including clearing firms, money managers, mutual funds, and insurance companies etc.

X. The Review and Testing of the Plan

A method will be developed to periodically test parts of the plan.



This BCP is to be reviewed at least annually by our management team. Changes to be implemented more frequently if needed. Sue McKeown, our CCO has the authority to execute this BCP.

XI. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers when requested. We also post the disclosure statement on our Web site. Our disclosure statement is attached.

XII. Senior Manager Approval

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

Signed: 
Title: 
Date: 