



***SOVEREIGN***  
WEALTH ADVISORS LLC

**BUSINESS CONTINUITY PLAN  
(BCP)**

**TO BE USED IN CASE OF  
EMERGENCY/ SIGNIFICANT  
BUSINESS DISRUPTION  
(SBO)**

**I. Firm Policy**

Sovereign Wealth Advisors, LLC is committed to safeguarding the interests of our clients and customers in the event of any emergency or Significant Business Disruption (“SBD”). This BCP summarizes Sovereign Wealth Advisors, LLC’s efforts to mitigate risks inherent with unforeseen business interruptions. The BCP is designed to protect our employees’ well-being, 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 even in the event of an emergency or SBD.

**II. Significant Business Disruptions (SBDs)**

SBDs can range from small interruptions such as a power outage to major catastrophes such as terrorist attacks and natural disasters. These events affect our firm’s ability to communicate with clients and essential service providers and prevent the operation of the securities markets.

**III. Business Description**

Sovereign Wealth Advisors, LLC is a Registered Investment Advisory firm involved in the financial management of client accounts.

**IV. Office Locations**

Sovereign Wealth Advisors, LLC has 2 offices located at:

3120 Southwest Freeway  
Suite 500  
Houston, Texas 77098

500 N. Water St.  
Suite 700  
Corpus Christi, Texas 78401

**V. Disaster Recovery Office (DRO)**

In the event of an SBD, we will move our operations to an office location that is unaffected. If both offices experience an SBD, employees will be required to work remotely from home.

**VI. Disaster Recovery Team:**

<u>Name</u>	<u>Title</u>	<u>Cell Phone Number</u>
Russell Gebhard	Managing Member and Chief Compliance Officer	713-299-2337
Paul Dixon	Managing Director – Branch Manager - Greenway Plaza	281-703-7305
Jackie Ortiz	Chief Administrative Officer	

David Spann	Branch Operations Manager	
William Vaseliades	Managing Director – Branch Manager – Corpus Christi	832-875-6921

**VII. Responsibilities**

Each Disaster Recovery Team member is responsible for understanding his/her role during a SBD. The following individuals have the primary responsibility for implementation and monitoring of the BCP:

- Russell Gebhard, Paul Dixon, Jackie Ortiz. William Vaseliades ( for CC ) are responsible for documenting computer back-up procedures, i.e., frequency, procedure, person(s) responsible, etc.
- Russell Gebhard, Paul Dixon, Jackie Ortiz. William Vaseliades ( for CC ) are responsible for designating back-up storage location(s) and persons responsible to maintain backup data in separate locations.
- Russell Gebhard, Paul Dixon, Jackie Ortiz. William Vaseliades ( for CC ) are responsible for identifying, contacting, listing key or mission critical people in the event of an emergency or disaster, obtaining their names, addresses, e-mail, fax, cell phone and other information and distributing this information to all personnel.
- Russell Gebhard, Paul Dixon, Jackie Ortiz. William Vaseliades ( for CC ) are responsible for designating and arranging recovery location(s) for mission critical persons to meet to continue business, and for obtaining or arranging for adequate systems equipment for these locations.
- Russell Gebhard, Paul Dixon, Jackie Ortiz. William Vaseliades ( for CC ) are responsible for establishing back-up telephone/communication system for clients, personnel and others to contact the firm and for the firm to contact clients.
- Russell Gebhard, Paul Dixon, Jackie Ortiz. William Vaseliades ( for CC ) are responsible for determining and assessing back-up systems and/or recovery plans for key vendors and mission critical service providers.
- Russell Gebhard, Paul Dixon, Jackie Ortiz. William Vaseliades ( for CC ) are responsible for conducting periodic and actual testing and training for mission critical and all personnel.

**VIII. When an SBD Occurs During Office Hours**

In the event of an emergency during office hours, call 911. The next appropriate course of action will depend on the nature of the emergency. Most types of emergencies will require all employees to quickly evacuate the building, including fire, bomb threats, etc. If so, gather your belongings, if time safely permits and promptly exit the building.

Certain emergencies, however, may require that employees remain in-doors, including the release of a hazardous airborne substance in the immediate vicinity of the firm’s principal office. Employees should, at all times, follow the instructions of emergency personnel. All employees are to meet at the designated area indicated below, if safe to do so, following any evacuation of the principal office.

Designated Meeting Area: Just inside of parking garage for Houston

## **IX. When an SBD Occurs After Office Hours**

In the event of a SBD occurring after business hours, each employee must be contacted, informed of the nature of the event, and given instructions regarding if, when and where to convene. Any employee initially discovering an emergency situation at the principal office must contact Russell Gebhard to inform him of the situation. If, for any reason, Mr. Gebhard cannot be reached, the employee is to contact an alternative Disaster Recovery Team Member.

If, for instance, the disruption involves a power failure, an employee must first notify Mr. Gebhard or a Disaster Recovery Team Member. That person shall contact the utility company to obtain an estimate of when power will be restored to the principal office. Once a plan of action has been decided upon, the Disaster Recovery Member will contact all employees to notify them of the appropriate course of action.

## **X. Disruption in Services of Critical Third-Party Vendor**

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In the event of a disruption in the services provided by a critical service provider, Mr. Gebhard will contact the vendor to determine the nature of the problem and an estimate of the restoration of services. If the vendor cannot be reached and services cannot be restored, Mr. Gebhard will determine an appropriate “work-around” solution. Sovereign Wealth Advisors, LLC will also reference the vendor’s own recovery plan on file to attempt to determine likely causes of the disruption and the vendor’s own estimate of the restoration of services therefrom. If continued efforts to contact the vendor and/or to restore services are unsuccessful, all relevant files can be accessed via offsite servers at LPL Financial. Business will continue to run using personal telephones, cloud technology, and internet services available at the DRO.

## **XI. Customers’ Access to Funds & Securities**

Our firm does not maintain custody of customers’ funds or securities. LPL Financial (“LPL”) does hold our clients’ funds or positions. In the event of an internal or external SBD, if telephone service is available, our employees will take customer orders or instructions and contact our custodian on their behalf.

## **XII. Data Back-Up & Recovery (Hard Copy & Electronic)**

Our firm maintains its paper copy of books and records in our Houston office, where it is securely locked and protected.

In addition, all books and records are scanned and uploaded onto an online cloud data storage. All data is backed-up daily. This process is fully automated and is completed via a secure Internet connection.

In the event of an internal or external SBD that causes loss of our paper records, we will recover them from our online cloud. For the loss of electronic records, for instance, a record is mistakenly deleted; we will contact the technical support center to recover the lost data.

Email communication is also available on the cloud and can be remotely accessed via home computers.

### **XIII. Financial & 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, personal mobile phones, and secure email. In addition, we will retrieve our key activity records as described in the section above, *Data Back-Up & Recovery (Hard Copy & Electronic)*.

In the event that Sovereign Wealth Advisors, 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.

### **XIV. 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. These mission critical systems are available at our DRO.

### **XV. Internet Connection**

Our internet carrier is Logix Communications. In the event our internet is unavailable, our DRO has an internet connection that will enable us to access LPL's online system as well as the website of our regulators and service providers.

### **XVI. Telephone System**

In the event that our local "land-line" telephone service is disrupted, employees are encouraged to use their personal cellular phones to conduct business until service is restored. Sovereign Wealth Advisors, 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.

### **XVII. Loss of Key Personnel**

Russell Gebhard is the sole Managing Member of Sovereign Wealth Advisors, LLC. In the event Mr. Gebhard is incapacitated or fails to be competent in performing his duties Paul Dixon, Jackie Ortiz and William Vaseliades will be responsible for all business functions of Sovereign Wealth Advisors, LLC. Paul Dixon and William Vaseliades will notify all client, key vendors, and regulatory agents of such event and will submit any proper refunds to clients, if applicable.

### **XVIII. Refunding Fees Paid in Advance**

In the event that Sovereign Wealth Advisors, LLC is unable to conduct business, clients will be given a pro-rata refund of unearned advisory fees from the day business was unable to be conducted to the end of the quarter.

**XIX. Disclosure of Business Continuity Plan**

We provide in writing this BCP disclosure statement to customers upon their request.

**XX. Updates, Testing & Annual Review**

Each employee will receive two (2) copies of the Sovereign Wealth Advisors, LLC's BCP. One copy of the Plan is to be kept at the employee's work station. The other copy is to be kept at the employee's home address.

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

**XXI. 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: Russell Gebhard

Date: 06/01/2016

Title: Chief Compliance Officer

See Attached Appendices

APPENDIX A  
EMPLOYEE CONTACT SHEET  
EMERGENCY CONTACTS NOTED IN RED

DIRECT	NAME	EXT	CELL
281-482-2100	Art Blair		281-482-5096
713-527-3437	Brandon Gay	3437	713-922-5286
713-527-3431	Charlie Fahy	3431	281-507-4637
713-527-3405	Daniel Eaton	2365	832-419-6675
713-527-3430	David Hanson	3430	713-819-5067
713-527-3432	David Spann	3432	713-898-5147
713-527-3422	Diva Silva	3422	281-684-3375
713-527-3433	Doug Yauger	3433	713-594-4743
281-804-7329	Elisia Pearson		281-804-7329
832-969-9630	Frank Sarubbi	3410	Fax 281-463-0527
713-527-3412	Jackie Ortiz	2327	
713-527-3436	Jaime Tavarez	3436	832-563-3377
713-527-3408	Jeff Peskin	2425	281-451-8826
713-527-3416	Judy Myers	3416	832-545-5116
713-527-3406	Kay Boyd	2387	713-447-6489
713-527-3434	Marcus Jasso	3434	281-701-0636
713-527-3409	Marty Peskin	2465	713-303-8364
713-527-3413	Matt Holder	3413	713-385-9559
713-527-3403	Neal Britt	2326	713-858-9426
713-527-3435	Paul Dickens	3435	713-416-8116
713-527-3404	Paul Dixon	2502	281-703-7305 – Mg. Dir. - Houston
713-527-3421	Paul Wobbe	3421	713-240-9518
713-527-3417	Phillip Evans	3417	713-725-2019
713-527-3401	Rusty Gebhard	2501	713-299-2337
713-527-3424	Stephen Petty	3424	281-382-2855
<b>Corpus Christi</b>			
361-883-5611	Ben Foster		

361-884-0008	William Vaseliades		Managing Director – Corpus Christi
832-875-6921	Bill Bevill		
214-530-1869	Scott Barber		