



# STRATEGIC INVESTMENT ADVISORS

## BUSINESS CONTINUITY AND DISASTER PLAN

Continued business operations are critical for Strategic Investment Advisors, Inc. ("SIA"). We will attain continued business operations by following our Business Continuity and Disaster Plan as follows:

### **Emergency Contact Persons**

SIA's two emergency contact persons are: Kirk Cassidy, [kcassidy@seniorplanningadvisors.com](mailto:kcassidy@seniorplanningadvisors.com), 248-567-6688, and Jessica L. Cassidy, [jcassidy@seniorplanningadvisors.com](mailto:jcassidy@seniorplanningadvisors.com), 248-567-6688. These names will be updated in the event of a material change, and our Executive Representative will review them annually.

### **Firm Policy**

SIA'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 SIA'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.

### **Significant Business Disruptions (SBDs)**

SIA's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as fire in our building. 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 our clearing firm.

### **Approval and Execution Authority**

Kirk Cassidy, Chief Compliance Officer, is responsible for approving the plan and for conducting the required annual review. Kirk Cassidy has the authority to execute this BCP.

### **Plan Location and Access**

SIA 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**

Strategic Investment Advisors, Inc., ("SIA") was founded in 2007. Cassidy and Associates Inc. is the primary owner.

SIA is a fee based financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm's managing member is affiliated with entities that sell insurance products.

SIA does not act as a custodian of client assets. The client always maintains asset control.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or risk analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Under CCR Section 260.238(k), SIA, its representatives or any of its employees will disclose to the clients all material conflicts of interest.

#### **Office Location**

SIA's main office is located at 38695 W. Seven Mile Road, Suite 125, Livonia, MI 48152. Its main telephone number is 248-567-6688.

#### **Alternate Physical Location**

In the event of an SBD, we will move business operations to 52797 Trailwood Drive in South Lyon, MI. Its main telephone number is 248-240-9200.

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

SIA does not maintain custody of customer's funds or securities, which are maintained at our clearing firm. Fidelity Investments Institutional is our Custodian. In the event of an internal or external SBD, if telephone service is available, customers may access their funds and securities by contacting Fidelity Investments Institutional at 800-544-4774. SIA will make this information available to customers through its disclosure policy.

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

SIA maintains its primary electronic and hard copy books and records at 38695 W. Seven Mile Road, Suite 125, Livonia, MI 48152. SIA backs up its electronic records daily on a web based backup system. In the event of an internal or external SBD that causes the loss of our records, SIA will recover them from our electronic back up.

#### **Financial Operational Assessments**

##### **Operational Risk**

In the event of an SBD, we 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 we will employ will include our telephone voice mail, and secure e-mail. In addition, we 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, 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, 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.

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

##### **Customers**

SIA currently communicates with our customers using the telephone, e-mail, our Web site, fax, U.S. mail. 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 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**

SIA 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**

SIA 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. We 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 our firm. Our major suppliers are:

**Company Name: RIA Registrar, LLC**

City: Arden Hills State: MN

Phone: (800) 441 - 1219

Materials/Service Provided: Compliance Consulting

**Company Name: Fidelity Investments Institutional**

City: Covington State: KY

Phone: (800) 544-4774

Materials/Service Provided: Custodial Broker Dealer

**Company Name: Global Financial Private Capital**

City: Sarasota State: FL

Phone: (844) 785-3802

Materials/Service Provided: Third Party Money Manager

**Regulatory Reporting**

SIA is subject to regulation by SEC regulators. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we 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 (written or oral) to our previous filing method. In the event that SIA cannot contact our regulators, we will continue to file required reports using the communication means available to us.

**Disclosure of Business Continuity Plan**

SIA will provide in writing a BCP disclosure to customers upon request.

**Updates and Annual Review**

SIA 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, SIA will review this BCP annually to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

# ACKNOWLEDGEMENT OF PLAN REVIEW

## BUSINESS CONTINUITY AND DISASTER PLAN

### Senior Manager Approval

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

Signed: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

### Employee Acknowledgement

I have received and understand this Business Continuity Plan.

Signed: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Signed: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Signed: \_\_\_\_\_

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