

**Trinity Wealth Securities, LLC (TWS)**  
**Trinity Wealth Advisors, LLC (TWA)**  
**Business Continuity Plan (BCP) as of 02/19/2015**

## **I. Emergency Contact Persons**

The firms' two emergency contact persons are:

Alan M. Smith  
(314) 966-0033 ext. 600  
[asmith@trinitywealth.com](mailto:asmith@trinitywealth.com)

and

James E. Matush, Jr.  
(314) 966-0033 ext. 100  
[jmatush@trinitywealth.com](mailto:jmatush@trinitywealth.com)

These names will be updated in the event of a material change, and TWS's Executive Representative will review them within 17 business days of the end of each year.

*Rule: FINRA Rule 4370(f); NASD Rule 1160.*

*(Administrative Notes: These names must be updated in the event of a material change and reviewed by TWS's Executive Representative yearly within 17 business days of the end of each year. These names must also be reported to FINRA through FINRA's Contact System (formerly known as the FINRA Member Firm Contact Questionnaire or NMFCQ) at [www.FINRA.com/ncs.asp](http://www.FINRA.com/ncs.asp). Each emergency contact person must be a member of senior management and a registered principal.)*

## **II. Firm Policy**

The combined firms' 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 the customers to transact business. In the event it is determined that the firms are unable to continue business operations, customers will be assured prompt access to their funds and securities.

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

The plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the firms' ability to communicate and do business, such as a fire in the 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. The response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of custodial, clearing and/or direct investment firms. (Henceforth the term "custodians" will be used generically to include custodial firms and/or clearing firms and/or direct investment companies.)

## **B. Approval and Execution Authority**

Alan M. Smith, Compliance Officer and a registered principal of TWS, is responsible for approving the plan and conducting the required annual review for TWS. Alan Smith has the authority to execute this BCP on behalf of TWS. Thomas Grady, Compliance Officer of TWA, is responsible for approving the plan and conducting the annual review for TWA. Tom Grady has the authority to execute this BCP on behalf of TWA.

## **C. Plan Location and Access**

Both firms will maintain copies of the BCP plan and the annual reviews, and the changes that have been made to it for inspection. TWS has given a copy of the plan to:

FINRA District 4  
120 West 12th Street Suite 900  
Kansas City, MO 64105

An electronic copy of the plan is located in the following location: [System \(\\trinityw.sharepoint.com@SSL\)](\\trinityw.sharepoint.com@SSL) (J:)\\Compliance\\2014 Annual Meeting\\. The file name is [BCP updated 2015-1-5.docx](#). In addition to the firms' standard backup procedures, an additional backup is maintained on the laptop computer ('Alan's Laptop') in the following location: C:/Documents and Settings/asmith/My Documents/TWS/Compliance/BCP.

*(Administrative Notes: A copy of this plan has been – and any updates to it should be – given to all employees. FINRA provides a secure online location, the BCP Repository Service for firms to back up their business continuity plans. For information, email [continuityrepository@FINRA.com](mailto:continuityrepository@FINRA.com). This service is available to members for a fee.)*

## **III. Business Description**

TWA conducts business primarily in traditional equity & fixed income securities. This includes individual securities, mixed funds and ETF's. To a lesser degree TWA conducts business with institutional CD's, derivative securities and private placements (for clients who are qualified investors). TWS is an introducing firm and does not perform any type of clearing function for itself or others. TWS conducts direct business with mutual fund and variable life and annuity companies. Neither firm holds customer funds or securities. Both firms accept and transmit orders to the respective custodians. All transactions are sent to respective custodians, which execute orders, compare them, allocate them, clear them and settle them. The custodians also maintain customer accounts, can grant customers access to them, and deliver funds and securities. TWA services both retail and institutional customers, whereas TWS services retail customers only.

TWA utilizes several custodians, and TWS does business directly with various mutual fund and variable life and annuity companies. Business is transacted with these companies on



behalf of customers. Their contact information is available to customers in their prospectuses and on their regular statements.

Our custodians are:

Charles Schwab & Company  
Four Corners Team / Heartland Team (877) 716-6938 or  
Managed Accounts Team (877) 241-2890  
3133 E. Lincoln Drive  
Phoenix, AZ 85016  
[heartland.sales@schwab.com](mailto:heartland.sales@schwab.com)  
[www.schwabinstitutional.com](http://www.schwabinstitutional.com)

Pershing  
1 Pershing Plaza  
Jersey City, NJ 07399  
(800) 445-4467  
[www.pershing.com](http://www.pershing.com)

Fidelity  
National Team  
100 Crosby Parkway, Mail Zone KC1J-0074  
Covington, KY 41015  
(800) 523-1203  
[www2.advisorchannel.com](http://www2.advisorchannel.com)

SEI Private Trust Company  
Midwest Service Team  
One Freedom Valley Drive  
Oaks, PA 19456  
(800) 734-1003  
[www.seibusinessbuilder.com](http://www.seibusinessbuilder.com)

American Funds Service Company  
5300 Robin Hood Rd.  
Norfolk, VA 23513-2430  
(800) 421-0180  
[www.americanfunds.com/adviser](http://www.americanfunds.com/adviser)

Oppenheimer Funds Distributor  
Two World Financial Center  
225 Liberty Street  
New York, NY 10281-1008  
(800) 225-5677  
[www.oppenheimerfunds.com](http://www.oppenheimerfunds.com)

Prudential  
One Corporate Drive  
Shelton, CT 06484  
(800) 541-3087  
[www.prudential.com](http://www.prudential.com)

Jefferson National  
10350 Ormsby Park Place  
Louisville, KY 40223  
(866) 677-0564  
[www.jeffnat.com](http://www.jeffnat.com)

Ohio National  
One Financial Way  
Cincinnati, OH 45242  
(888) 925-6446  
[www.ohionational.com](http://www.ohionational.com)

The custodians have also given us the following alternative contact **for TWA and TWS use only** in the event they cannot be reached:

Shane Bengston  
Charles Schwab & Company  
100 Chesterfield Business Parkway  
Suite 300  
St. Louis, MO 63005  
(636) 519-0178

Pershing  
Derek Purdo  
135 Main Street  
Suite 500  
San Francisco, CA 94105  
(630) 472-6740

Fidelity  
Kathy Marshall  
601 Carlson Parkway  
Suite 1050  
Minnetonka, MN 55305  
(617) 563-2559

SEI  
181 West Madison St.  
Suite 2800  
Chicago, IL 60602  
(610) 676-2174



American Funds  
C. Alan Brown  
PO Box 6007  
Indianapolis, IN 46206-6007  
(800) 421-8304

Oppenheimer Funds  
Brian Austin  
6803 South Tucson Way  
Centennial, CO 80112  
(800) 377-3838

Prudential  
Customer Service Department  
P.O. Box 7960  
Philadelphia, PA 19176  
(800) 628-6039 x53730

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

Both firms operate from a single office.

##### Office Location

The Office is located at: 132 W. Washington Ave., Suite 200  
St. Louis, MO 63122

The main telephone number is: (314) 966-0033

Employees may travel to that office by means of foot, car, bus, or taxi. They engage in order taking, order transmission to custodians, maintenance of customer account records, and assisting customers with access to accounts at this location.

#### **V. Alternative Physical Location(s) of Employees**

In the event of an SBD, we will relocate our office to the residence of James E. Matush, Jr.:

1455 Cragwold Road  
Kirkwood, MO 63122

The main telephone number is: (314) 965-1106

Some of the staff may be asked to work out of their homes staying in contact via phone, text, email and instant message.

*Rule: FINRA Rule 4370(c)(6).*

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

The Trinity firms do not maintain custody of customers' funds or securities, which are maintained at the custodians. In the event of an internal or external SBD, if telephone service is available, registered Trinity persons will take customer orders or instructions and contact the custodians on their behalf.

The firm will make this information available to customers through its disclosure policy. If SIPC determines that either or both firms are unable to meet obligations to customers, or if either or both firms' liabilities exceed such firms' assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse that firm(s)'s assets to customers. The firm(s) will assist SIPC and the trustee by providing books and records identifying customer accounts subject to SIPC regulation along with any available contact information for the custodians.

*Rules: FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; 15 U.S.C. 78eee (2003).*

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

Both firms maintain their primary hard copy books and records at our office address below. Electronic records are also maintained on either a private network or on a shared workstation located at our office address:

132 W Washington Ave.  
Suite 200  
St. Louis, MO 63122

James E. Matush, Jr., President, (314-966-0033) is jointly responsible for the maintenance of books and records for both firms with the applicable firm's CCO.

TWS maintains the following document types and forms that are currently neither transmitted to an outside party nor stored in electronic form.

New Account Forms  
Mutual Fund / Variable Annuity Explanation of Investment Forms  
Mutual Fund / Variable Product Switch Forms

TWA maintains copies of most hard copy books and records. In addition, most primary hard copy records are maintained at our custodial firms, Charles Schwab & Company, SEI & Fidelity.

Both Trinity firms back up cloud-based electronic records in an encrypted format daily. The shared workstation is backed up onsite to an external hard drive and also to an offsite data center. All Microsoft Outlook data (email, instant messaging, contacts, calendars, tasks) and Sharepoint files are contracted through 'Microsoft Office 365' and is hosted on the 'cloud' by that service. All access, backup and storage is performed by that service.

Microsoft Office 365



(866) 559-5605  
<http://portal.microsoftonline.com>

Additional permanent backups are handled by Global Relay:  
Global Relay Communications Inc.  
**New York Office**  
286 Madison Avenue, 7th Floor  
New York, NY, USA 10016-6368  
866-484-6630

In the event of an internal or external SBD that causes the loss of paper records, physical copies will be recovered from the custodian(s). If Trinity's primary location is inoperable, work will be continued immediately from a combination of employee's homes and our alternate location. This is possible since all our data is stored on a private network with the exception of our CRM. If the CRM data is destroyed we will recover it to a new workstation from the last daily cloud backup. The critical client data in that CRM is presently available in Microsoft Outlook for use during the day it may take to recover the CRM.

*Rule: FINRA Rule 4730(c)(1).*

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

### **A. Operational Risk**

In the event of an SBD, both firms will immediately identify what means will permit communication with customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options employed will include the Web site, telephone, voice mail, email, regular mail, overnight mail service, fax, and courier. In addition, key activity records will be retrieved as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

*Rules: FINRA Rules 4370.*

### **B. Financial and Credit Risk**

In the event of an SBD, both firms will determine the value and liquidity of investments and other assets to evaluate the ability to continue to fund operations and remain in capital compliance. Custodians, critical banks, and investors will be contacted to apprise them of the financial status as required. If it is determined that obligations to those counter-parties or that continued funding of operations may not be able to be met, additional financing from banks or other credit sources will be requested to fulfill obligations to customers and clients. If a capital deficiency cannot



be remedied, appropriate notices will be filed with regulators and appropriate steps will be taken immediately, including:

- Initiate additional capital contributions from the firm's general partners
- Initiate unsecured loans from the firm's general partners

*Rules: FINRA Rules 4370(c)(3), (c)(8) & (g)(2).*

## **IX. Mission Critical Systems**

The firms' "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, order transmission to custodial firm, maintenance of customer account records, and assisting customers with access to accounts. More specifically, these systems include:

- Filling out customer order/application forms
- Mailing (regular or overnight) those order/application forms to custodians
- OR Mailing (regular or overnight) those order/application forms to the appropriate custodians
- OR Faxing those order/application forms to the appropriate custodians (as permitted)
- OR Scanning and Emailing those order/application forms to the appropriate custodians (as permitted)
- Monitoring transactions to their completion
- Maintaining customer files including current account statements (paper and/or electronic)
- Assisting customers with access to their accounts at custodial firms

The firms have primary responsibility for establishing and maintaining business relationships with customers and have sole responsibility for the mission critical functions of order taking and entry. Custodians provide, 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.

The custodian contracts provide that the custodians will maintain a business continuity plan and the capacity to execute that plan. The custodians represent that they will advise of any material changes to their plans that might affect the ability to continue business operations. In the event a custodian executes its plan, it represents that it will notify of such execution and provide equal access to services as its other customers. If it is reasonably determined that a custodian has not or cannot put its plan in place quickly enough to meet needs, or is otherwise unable to provide access to such services, the custodian represents that it will assist in seeking services from an alternative source.

The custodians represent that they backup records at a remote site, that they operate a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as their primary sites, and have also confirmed the effectiveness of their back-up arrangements to recover from a wide scale disruption by testing.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times.

Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. The custodians have the following SBD recovery time and resumption objectives: recovery time period of within four hours and resumption time of within one business day.

## **A. The Firm's Mission Critical Systems**

### **1. Order Taking**

Currently, both firms receive orders from customers via telephone, fax, email, regular mail and in person visits by the customer. During an SBD, either internal or external, orders will continue to be taken through any of these methods that are available and reliable, and in addition, as communications permit, customers will be informed when communications become available to tell them what alternatives they have to submit their orders. Customers will be informed of alternatives by phone, fax, email, and regular mail. If necessary, customers will be advised to place orders directly with the appropriate custodian (see Section III above).

### **2. Order Entry**

Currently, both firms enter orders by recording them on paper and electronically and sending them to custodians by regular mail, overnight mail service, electronically or telephonically.

In the event of an internal SBD, records will be entered and sent to custodians by the fastest alternative means available, which include regular mail, overnight mail service, electronically or telephonically. In the event of an external SBD, the order will be maintained in electronic or paper format, and delivered to the custodian(s) by the fastest means available when it resumes operations. In addition, during an internal SBD, customers may need to be referred directly to custodians for order entry.

Virtual Partners Group (VPG) located in California, is also authorized to enter orders for Trinity at Assetmark and Envestnet and could be extremely valuable in case of an SBD.

### **3. Order Execution**

Neither firm currently executes orders.

### **4. Other Services Currently Provided to Customers**



In addition to those services listed above in this section, both firms provide maintenance of customer account records and assisting customers with access to accounts.

In the event of an internal SBD, these services would continue to be provided from the Alternate Physical Location by phone, fax, email, regular mail or overnight mail service. In the event of an external SBD, customer request(s) for assistance would be maintained in electronic or paper format, and the request would be completed with the custodian by the fastest means available when it resumes operations. In addition, during an internal SBD, customers may need to be referred directly to the custodian(s) for maintenance of customer account records and access to customer accounts.

## **B. Mission Critical Systems Provided by Custodians**

TWA relies, by contract, on custodial firms to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts. TWS relies on the investment companies with which we make direct investments.

*Rules: FINRA Rules 3510(c) & (g)(1).*

## **X. Alternate Communications Between the Firm and Customers, Employees, and Regulators**

### **A. Customers**

Communications with our customers are accomplished via the telephone, email, fax, U.S. mail, and in person visits at the firms' office or at the other's location. In the event of an SBD, an assessment will be made as to which means of communication are still available, and use the means closest in speed and form (written or oral) to the means that have been used in the past to communicate with the other party. For example, if communications with a party have typically been conducted by email but the Internet is unavailable, the telephone will be used as the replacement means with a paper copy in the U.S. mail where a written record is needed.

*Rule: FINRA Rule 4370(c)(4).*

### **B. Employees**

Communications with employees is accomplished using the telephone, email, 'instant messaging,' and in person. In the event of an SBD, an assessment will be made as to which means of communication are still available, and the means closest in speed and form (written or oral) to the means that that have used in the past to communicate with the specific employee will be employed. A 'call tree' will also be utilized so that senior



management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. Individuals have been identified, as noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: Jim Matush.

<b><u>Caller</u></b>	<b><u>Call Recipients</u></b>
Jim Matush	Alan Smith, Eric Steiner, Carol Campey
Alan Smith	Debbie Seeney, Karen Kresyman, Jennifer Yarbrow, Joyce Nischbach, Deb Hawley, Justin Anderson
Eric Steiner	Jim Evens, Thomas Grady

*Rule: FINRA Rule 4370(c)(5).*

### **C. Regulators**

The firms are currently regulated by one or more the following: FINRA, SEC, Missouri Secretary of State - Securities Division, and the State of Missouri Insurance Department. Communications with regulators is accomplished using the telephone, email, fax, U.S. mail, and in person. In the event of an SBD, an assessment will be made as to which means of communication are still available, and the means closest in speed and form (written or oral) to the means that have been used in the past to communicate with the other party will be used.

*Rule: FINRA Rule 4370(c)(9).*

## **XI. Critical Business Constituents, Banks, and Counter-Parties**

### **A. Business constituents**

Critical business constituents (businesses with which an ongoing commercial relationship in support of operating activities, such as vendors providing critical services) have been contacted, and the extent to which the business relationship with them (in light of the internal or external SBD) has been determined. If a business constituent can no longer provide the needed goods or services when needed because of a SBD to them or the firms, alternative arrangements will established quickly. Our major suppliers are:

Portfolio Management	Microsoft Office365
Schwab Performance Technologies	(800) 865-9408
8717 West 110th Street	
Suite 100	Virtual Partners Group
Overland Park, KS 66210	21241 Ventura Blvd.
(913) 491-8383	Suite 176
	Woodland Hills, CA 91364
	(818) 716-1934

Data Downloading  
DST Systems, Inc.  
4900 Main, 7th Floor  
Kansas City, Missouri 64112  
(816) 936-2964

Charter Communications  
941 Charter Commons Street  
Town and Country, MO 63017  
(888) 438-2427

*Rules: FINRA Rule 4370(c)(7).*

## **B. Banks**

The firm's banks and lenders have been contacted to determine if they can continue to provide the financing that would be needed in light of an internal or external SBD. The bank maintaining the operating accounts is:

PNC Bank  
333 S. Kirkwood Road  
St. Louis, MO 63122  
(314) 800-1520

The bank maintaining the Proprietary Account of Introducing Brokers/Dealers (PAIB account) is:

PNC Bank  
333 S. Kirkwood Road  
St. Louis, MO 63122  
(314) 800-1520

If the banks and other lenders are unable to provide the financing, alternative financing will be immediately sought from:

US Bank  
470 N Kirkwood Rd  
Kirkwood, MO 63122  
(314) 835-2320

*Rules: FINRA Rule 4370(c)(7).*

## **C. Counter-Parties**

Critical counter-parties, such as other broker-dealers or institutional customers, have been contacted to determine if the firms will be able to carry out ongoing transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, custodians or other counter-parties will be contacted directly to make alternative arrangements to complete those transactions as soon as possible.

*Rules: FINRA Rules 4370(a) &(c)(7).*

## **XII. Regulatory Reporting**



The firms are subject to regulation by: FINRA, SEC, and the Missouri Secretary of State - Securities Division. Reports are filed with regulators using paper copies in the U.S. mail, and electronically using fax, email, and the Internet. In the event of an SBD, SEC, FINRA, and other regulators will be contacted to determine which means of filing are still available, and the means closest in speed and form (written or oral) to the previous filing method will be used. In the event that a regulator cannot be contacted, reports will continue to be filed using the most comparable means of communication that are available.

FINRA District 4  
120 West 12<sup>th</sup> Street Suite 900  
Kansas City, MO 64105  
(816) 802-4740  
(816) 421-5029 fax  
(301) 590-6500 CRD# hotline

SEC  
Midwest Regional Office  
175 W. Jackson Blvd., Suite 900  
Chicago, IL 60604  
(312) 353-7390  
Email: [chicago@sec.gov](mailto:chicago@sec.gov)

Office of the Secretary of State  
Securities Division  
600 West Main Street  
Jefferson City, MO 65102  
(573) 751-4704

State of Missouri Insurance Dept.  
MO DIFP-Insurance  
PO Box 4001  
Jefferson City, MO 65102  
(573) 751-3518  
Email: [licensing@insurance.mo.gov](mailto:licensing@insurance.mo.gov)

*Rule: FINRA Rule 4370(c)(8).*

### **XIII. Disclosure of Business Continuity Plan**

TWS will disclose in writing a summary of the BCP to customers at account opening. It will also be mailed to customers upon request. The summary addresses the possibility of a future SBD and the plan to respond to events of varying scope. In addressing events of varying scope, the summary (1) provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption); (2) states whether the firm plans to continue business during that scenario and, if so, the planned recovery time; and (3) provides general information on the intended response. The summary discloses the existence of back-up facilities and arrangements.

*Rule: FINRA Rule 4370(e).*

### **XIV. Updates and Annual Review**

The 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, the firm will review this BCP annually, by December 31, to modify it for any changes in operations, structure, business, or location, or those of the custodians.

*Rule: FINRA Rule 4370(b).*



## XV. Senior Manager Approval

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

*Rule: FINRA Rule 4370(d).*

Signed: 

Name: James E. Matush, Jr.

Title: President (Trinity Wealth Securities and Trinity Wealth Advisors)

Date: 2/19/15