



SILICON VALLEY
PARTNERS



Financial Industry Regulatory Authority, Inc.

Business Continuity Plan

Updated on

December 12, 2019

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INTRODUCTION

Planning for the business continuity and recovery in the aftermath of a Significant Business Disruption (SBD) is important in order to ensure that the firm will be able to recover enough to continue business and meet existing obligations to its customers. This plan anticipates two kinds of SBDs: internal and external. Internal disruptions affect the firm's ability to communicate and do business, while external disruptions prevent securities markets or a number of firms from operating, such as in the case of a terrorist attack, an earthquake, a city flood or a wide-scale, regional disruption.

Silicon Valley Partners' policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and the firm's 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.

Silicon Valley Partners (SVP) conducts a limited securities business, including private placements of securities, merger and acquisition advisory services. The firm does not hold customer funds or securities. Since SVP is a small broker/dealer, preparation for, response to and recovery from a disaster requires the cooperative efforts of all employees and Associated Persons of the firm. Silicon Valley Partners is approved to operate under the waiver of the two principal requirement. Blake Warner is the only General Securities Principal of the firm.

The firm operates from one office (home office and supervisory branch office) located at 5871 E. Sanna Street, Paradise Valley, AZ 85253. This location can be reached by foot, bus, train/subway, taxi and personal automobile.

The Business Continuity Plan is developed based on the size and needs of the firm, but will address, at a minimum, each of the following areas:

- Person Responsible for the Business Continuity Plan;
- Data back-up and recovery (hard copy and electronic);
- Mission critical systems;
- Financial and operational assessments;
- Alternate communications between customers and the member;
- Alternate communications between the member and its employees;
- Alternate physical location of employees;



- Critical business constituents, banks and counter-parties;
- Regulatory reporting;
- Communications with regulators; and
- How the member will assure customers' prompt access to their funds and securities in the event that the member determines that it is unable to continue its business.

A copy of this Business Continuity Plan will be maintained in a file in the home office and a copy stored offsite.

PERSON RESPONSIBLE

Blake Warner is responsible for establishing the plan, reviewing the plan on an annual basis, updating the plan annually (or as changes occur), approving the plan in writing and educating the firm's employees regarding the business continuity and disaster recovery procedures of the firm.

EMERGENCY CONTACT PERSONS

SVP's emergency contact persons are: (1) Blake Warner (President, General Securities Principal, Chief Compliance Officer, AML Compliance Officer, Executive Representative), 415-494-3434 primary, 415-317-2894 alternate, 415-494-3401 fax; email address is blake@svpartners.com and (2) Carol Ann Kinzer (CFO and FINOP), 678-525-0992 primary, 404-371-4250 alternate; email address is ckinzer@brokerageconsulting.com.

This information will be promptly updated in the event of a material change, including changes to the designation of the emergency contact persons, via FINRA's Contact System (FCS). SVP's Executive Representative or designee will review and update, when necessary, the emergency contact information on an annual basis (by the 17th business day following the close of the calendar year), or as changes warrant.

COMPUTER SECURITY, DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)

Silicon Valley Partners maintains its primary hard copy books and records and its electronic records at the home office of the broker/dealer in Paradise Valley, AZ. This company data includes customer records, client data,

associated person files, corporate documents, research, due diligence and financial data.

In order to have an effective business continuity plan, the firm will maintain the following information:

- Copy of the Business Continuity Plan
- Copies of corporate documents (operating agreements, formation documents, tax forms, corporate resolutions, minutes, etc.)
- A supply of blank checks
- Copies of marketing materials, if any
- Contact List
 - Employee contact list with home addresses, email addresses, and phone numbers (includes home number, cell number, pager number, emergency contact number, etc.)
 - Vendor contact list with account representative's names and phone numbers
 - FINRA contact list with district and national level names and phone numbers(as necessary)
 - SEC contact list with regional and national level numbers and addresses
 - Insurance Company contact list with regional and national level numbers and addresses (as necessary)
 - Bank contact list with names, numbers, and addresses

SVP has the following technology, communications systems and backup plans in place to provide data back-up and recovery services.

Computer Security:

SVP operates on a mixed MAC / Windows platform. All computers are password protected with “complex” password strength, utilizing minimum password length and case sensitivity. Passwords must also utilize alpha, number and symbol characters.

Telephone System:

SVP's phone/voice mail system is cloud-hosted solution through RingCentral and should not experience any downtime.

Email Back-up, Maintenance, Storage and Retention

Email is backed-up and archived by an independent provider, Global Relay, Inc., (866) 484-6630 (phone), , support@globalrelay.net (email). This data can be accessed within a reasonable amount of time (no longer than 48 hours).



Back-up of Firm Data and Documents

SVP has contracted with Egnyte to provide secure third party back up services for the data and documents of the broker/dealer. Services include back-up, recovery and archiving. Egnyte's contact information is: 1350 West Middlefield Road, Mountain View, CA 94043, Toll-free: 877-734-6983. Email is support@egnyte.com.

Also, SVP utilizes QuickBooks Online as its accounting software. Financial data is also backed up as noted above. In addition, the offsite/outsourced FINOP also provides additional financial documentation back-up for the firm. The FINOP maintains copies of monthly financials, bank statements, bank account reconciliations, net capital computations and FOCUS reports.

On-site Storage of Hard Copy/Paper Documents

In addition, SVP utilizes an on-site storage (lockable) for back-up hard copy document storage that is only accessible to the registered or non-registered fingerprinted persons associated with the broker/dealer.

TIMEFRAME FOR RESUMPTION OF BUSINESS IN THE EVENT OF AN SBD

Resumption depends on the infrastructure and utilities compromised in an emergency event or significant business disruption, and if SVP is able to relocate critical equipment (i.e. computers, file servers to an alternate location in the event the primary location structure is damaged to inhabatability). In consideration of these factors, and the fact that SVP has contracted with 2 outside vendors for email and document archiving, SVP could be up and running with complete functionality in 24 to 48 hours. In the event of not having access to the primary location to recover hardware, the time to recover critical data and resume business would be a little longer.

MISSION CRITICAL SYSTEMS

Mission critical systems are those used by the firm to ensure prompt and accurate processing of securities transactions. Due to the firm's limited securities business, no clearing firm relationship exists, nor does the firm utilize a back office system for record keeping and order processing.

Subscription documents, due diligence, offering documents, engagement letters, etc. are maintained according to the securities business conducted by the firm. The firm does not conduct a traditional retail securities business.

In the case of a SBD, deals will be executed in the same manner as described above, if possible. Should alternative arrangements for conducting business become necessary, SVP will make its investors and clients aware of those arrangements when communication becomes available.

The responsible person at SVP (Blake Warner) has the primary responsibility for establishing and maintaining business relationships with customers and has the responsibility for the mission critical systems of the broker/dealer.

FINANCIAL AND OPERATIONAL ASSESSMENTS

The firm utilizes the QuickBooks Online accounting software package. Access to the firm's financial data is available through online access and through the frequent back-ups conducted and stored by the system and by the FINOP.

Operational Risk

In the event of an SBD, SVP will immediately identify through what means the firm can communicate with investors, clients, 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 the firm will employ will include one or more of the following: the affiliate's web site, telephone voice mail, and email. In addition, the firm will retrieve key activity records as described in the section entitled Data Back-Up and Recovery.

Financial Risk

Note: SVP does not hold customer accounts, nor does it accept or hold any customer funds or securities.

In the event of a significant business disruption, the firm will determine the value and liquidity of its investments and assets and decide whether or not it is able to remain in compliance with net capital requirements. If the firm determines that it may not be able to meet its obligations, additional financing will be obtained through principal contributions in order to fulfill obligations to the firm's customers. If unable to maintain capital sufficiency, the firm will file appropriate notices with regulators and immediately take the steps that are outlined in SEC Rule 17a-11. This would include giving notice of deficiency

that same day to the principal office of the Commission in Washington, D.C., the regional or district office of the Commission, and FINRA. This notice shall be given by telegraph or fax.

Back-ups of the firm's monthly financial reports, net capital computation and FOCUS Reports are also maintained by the firm's Financial and Operations Principal, Carol Ann Kinzer.

ALTERNATE COMMUNICATIONS BETWEEN CUSTOMERS AND THE MEMBER

This Plan is designed to provide a consistent communication framework to plan for and/or respond to any crisis situation that may disrupt the firm's operations. Its purpose is to support the response to any crisis that may occur by providing timely, accurate information to customers.

In the event of a significant business disruption that disables telephone service or forces employees out of their primary location, SVP will remotely forward their office phones to their cell phones. By doing so, clients/customers can reach SVP by dialing the existing office telephone numbers.

SVP will communicate with clients/customers via telephone, fax, US mail, in-person visits and email. The firm will maintain (electronic and hard copy) a list of clients/customers, client/customer contact phone numbers and address, and if available, email addresses. This list will be updated on a regular basis. Client/customer information can be accessed remotely; therefore, if telephone service is available, the firm can communicate verbally with customers in the event of a significant business disruption. In the event of a disruption, the firm will determine which means of communication are still available and use the means closest in speed and form (written or oral) to the means used in the past to communicate with customers. For example, if the firm has communicated with a party by e-mail but Internet access is unavailable, the customer will be called on the telephone. SVP may also use registered mail as a way to contact customers.

If the firm has customer email addresses, an email will be sent to each client that may have pending securities business with the firm. This will give customers the opportunity to contact the firm, even if phone service is interrupted.

Each Associated Person has a cell phone and internet/email capabilities away from the office. This will allow contact with Registered Representatives away from the office, if necessary.

Any disruption to the firm's service will be posted on the firm's web site. This will give detailed information regarding the emergency situation and how to contact someone associated with the firm. The web site is also a good forum for communicating further emergency instructions to employees, clients and individual investors. Silicon Valley Partners' Business Continuity Plan Disclosure Statement also includes the language that customers may access firm information during an emergency situation by accessing the firm's webpage at www.svpartners.com.

ALTERNATE COMMUNICATIONS BETWEEN THE MEMBER AND ITS EMPLOYEES

This Plan is designed to provide a consistent communication framework to plan for and/or respond to any crisis situation that may disrupt the firm's operations. Its purpose is to support the response to any crisis that may occur by providing timely, accurate information to its employees. Should it be necessary to contact employees, senior managers will use the fastest, most efficient means available at the time. Communication may consist of telephone, email, fax, website or in person. In the event of an SBD, we will assess which means of communication are available for use and will employ the form of communication that will be the quickest, most effective way to reach that employee.

The firm will maintain a list of employee names, addresses and all contact phone numbers. This list will be maintained at the home office, branch office and stored electronically. Once the broker/dealer is operational, a call tree will be developed to allow for speed of contact with the employees of the firm. Employees will be contacted by the fastest method of communication available in the event of an SBD. The affiliate company's website will also be a good forum for communicating further emergency instructions to the firm's employees and associated persons.

To aid in the continuity and recovery process, each employee will have available a list of important phone numbers, and a secure list of computer log-ins and passwords.

Should there be a significant business disruption at the home office; employees will be instructed to work from home until further notice.

CRITICAL BUSINESS CONSTITUENTS, BANKS AND COUNTER-PARTIES

Critical Business Constituents

Critical business constituents (business with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services, issuers or product sponsors) 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 due to a SBD (either theirs or ours).

Banks

SVP maintains its bank accounts (checking and savings) with Wells Fargo Bank which has locations throughout the area and throughout the nation. Contact information for the Well Fargo branch for SVP is: Wells Fargo Bank, N.A., 100 E. 4th Avenue, San Mateo, CA 94401, 650-348-4518.

Silicon Valley Partners' bank records, including deposits, withdrawals and bank statements can be accessed from any Wells Fargo location or through the bank's on-line banking services.

The firm utilizes the QuickBooks Online accounting software package. Financial data can be accessed online by the firm and by the outsourced FINOP.

Counter-Parties

If necessary, SVP will contract with critical counter-parties to determine if transactions will be carried out in light of an internal or external SBD. Where the transactions cannot be completed, SVP will work with or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

REGULATORY REPORTING

SVP is regulated by FINRA, SEC, and the Arizona securities regulators, in addition to other state jurisdictions as selected by SVP after FINRA approval. Reports are currently filed electronically. In the event of a SBD, the firm will contact regulatory authorities and determine what methods of reporting are available. If the firm cannot contact authorities, regulatory reports, such as FOCUS reports, will be filed by the speediest method available that is closest in form to the previous filing method. If the internet is not available, the firm will file reports via overnight delivery service, US mail or fax.

COMMUNICATIONS WITH REGULATORS

The firm will maintain a list of names and telephone numbers of the securities regulators of SVP, as well as other contacts at FINRA, both on the district and national level. The list will include addresses, phone numbers and, if available, email addresses. This will allow the firm to communicate to FINRA, the SEC or any state regulator, any significant business disruption that may be experienced. Communication with regulators may be through telephone, fax, email, US mail and overnight delivery services. The firm's home office is in California where FINRA district and SEC regional offices are located. If necessary, the principals of the firm can access FINRA district personnel and SEC district personnel in person.

FINRA District Office - San Francisco District

FINRA

One Montgomery Street, Suite 2100
San Francisco, CA 94104
(415) 217-1100
Fax: (415) 956-1931

FINRA Office - Washington, DC

1735 K Street, NW
Washington, DC 20006

FINRA Office in Rockville, MD

9509 Key West Avenue
Rockville, MD 20850
301-590-6500
301-869-6699



SEC Regional Office

San Francisco District Office
Helene Morrison, District Administrator
44 Montgomery Street, Suite 2600
San Francisco, CA 94104
(415) 705-2500
e-mail: sanfrancisco@sec.gov

SEC - Washington, DC

SEC Headquarters
100 F Street, NE
Washington, DC 20549
Office of Investor Education and Assistance
(202) 551-6551
e-mail: help@sec.gov

Arizona Corporation Commission - Securities Division

1300 W. Washington St., 3rd Floor
Phoenix, AZ 85007
(602) 542-0326
www.azcc.gov

Arizona is the home state of SVP; however, SVP is also registered to conduct limited securities business in New York, Colorado, Massachusetts, Illinois, Nevada, Washington, and California.

**PROMPT ACCESS BY CUSTOMERS TO THEIR FUNDS AND SECURITIES
SHOULD SILICON VALLEY PARTNERS NOT BE ABLE TO CONTINUE
BUSINESS**

SVP does not hold any customer funds or safekeep customer securities. In the event of a SBD, if customers are unable to get in touch with SVP directly, they may contact escrow agents and/or issuers directly to gain access to their funds. Subscription agreements and/or memorandums received by customers contain addresses and contact information for escrow agents and issuers.

If SIPC determines that the firm is unable to meet its obligations to customers, or if its liabilities exceed assets, thus violating Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse the firm's assets to



customers. Should that event occur, the firm will provide its books and records identifying customer accounts subject to SIPC regulation.

REVIEW, MAINTENANCE AND UPDATING OF THE BUSINESS CONTINUITY PLAN

Ensuring that the Business Continuity Plan reflects ongoing changes is crucial to the successful implementation of the plan. This task includes reviewing the Plan and revising it to reflect updates, testing the updated Plan (if necessary) and training employees and Associated Persons to the updates. Maintenance of this plan is the responsibility of Blake Warner, President and General Securities Principal. Changes will be made as they occur and the firm will review the full Business Continuity Plan on an annual basis.

DISCLOSURE OF BUSINESS CONTINUITY PLAN

SVP provides a written BCP disclosure statement to individual investors the time the investment is made and thereafter, upon request. The firm's disclosure statement is attached.

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 a Significant Business Disruption.

Signed: _____

Title: _____

Date: _____



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Business Continuity Plan Disclosure

Updated on

December 12, 2019

BUSINESS CONTINUITY PLAN DISCLOSURE

Silicon Valley Partners LLC has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us - If after a significant business disruption, you cannot contact us as you usually do at 415-494-3400, you should call our alternative number 415-317-2894. You may also visit our website for further information or instructions (www.svpartners.com) on how to contact us.

Our Business Continuity Plan - We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Varying Disruptions - Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24 hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 48 hours. In either situation, we plan to continue business and notify you through best and quickest means possible how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities, if applicable.

For more information - If you have questions about our business continuity planning, you can contact us at 415-494-3400.