

Business Continuity Plan

Background

While it is recognized it is not possible to create a plan to handle every possible eventuality, it is the intent of LAMI to set up a framework to be used in the most likely of scenarios. It is also the intent that this framework provide guidance as to how to respond should an unforeseen situation occur.

LAMI believes that an adviser's fiduciary obligation to its clients includes the obligation to take steps to protect the clients' interests from being placed at risk as a result of LAMI's inability to provide advisory services after, for example, a natural disaster or, in the case of some smaller firms, the death of the owner or key personnel. The clients of an adviser that is engaged in the active management of their assets would ordinarily be placed at risk if the adviser ceased operations.

Business Description

LAMI conducts business in equity, fixed income, and other securities; it does not hold customer funds or securities. Transactions are sent to LAMI's brokerage firm, which executes its orders, compares them, allocates them, clears and settles them. LAMI's custodian maintains its clients' accounts, grants clients access to them, and delivers funds and securities.

Emergency Information

Firm Contact Persons

LAMI's two emergency contact persons are:

Contact Name	Phone	Email	Relationship
Joseph R Birkofer	(713) 503-2641	jbirkofer@legacyasset.com	President/CCO
Richard E Kaplan	(713) 828-3586	rkaplan@legacyasset.com	Vice President

Support Services

In the event of an emergency, the following is a list of support services and the methods by which they may be contacted:

Emergency Services (EMS): 911

Fire Department: 911

Police Department: 911

Internet Service Provider: Pure Light Wave (832) 615-8000
info@pslightwave.com

Data Backup Provider: Carbonite (855) 227-2249
businesssteam@carbonite.com

Service Provider	Company Name	Contact Name	Phone	Email
Accountant	BJ&J Small Business Services	Bernard J O'Rourke	(281) 236-6064	bj@bjjsmallbiz.com

Alternative firm contact in case of death of Key Personnel	Joseph R Birkofer
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This information will be updated in the event of a material change, and LAMI's CCO will review the plan on an annual basis.

Firm Policy

LAMI'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 the firm's books and records, and allowing its clients to transact business.

In the event that LAMI determines it is unable to continue its business, it will assure clients prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

LAMI's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only LAMI's ability to communicate and do business, such as a fire in its building or the death of a key member of the firm. 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.

LAMI's response to an external SBD relies more heavily on other organizations and systems, such as the brokerage firm(s) and Internet Service Providers it uses.

Approval and Execution Authority

The CCO is responsible for approving the plan and for conducting the required annual review. The CCO has the authority to execute this BCP.

Plan Location and Access

LAMI maintains copies of its BCP and annual reviews, and all changes that have been made. A physical copy of the BCP is stored with the company's Written Policies and Procedures Manual, which is kept in the following location: On the CCO's office desk in a red binder.

Each employee is given a copy of the plan and notified of the location/file within LAMI's electronic systems to which employees have access. Physical copies need to be returned upon termination of employment with the firm.

LAMI's Custodian and Brokerage Firm Contacts

Charles Schwab & Co., Inc. Advisor Services
450 Newport Center Dr. Suite, #410
Newport Beach, CA 92660
(877) 687-4085

Office Locations

LAMI's primary office address and phone number are:

3411 Richmond Ave, Suite 750
Houston, TX 77046
United States
713-355-7171

LAMI engages in client servicing, order taking and entry at this location.

Alternative Physical Location(s) of Employees

In the event of an SBD that makes it impossible or impractical to use any or all of the company offices, LAMI will move its staff from affected offices to the closest of its unaffected office locations.

If none of LAMI's other office locations is available, it will move the firm operations to:

2336 Dunstan Road
Houston, TX 77005
United States
(713) 520-5642

Mission Critical Systems

LAMI's "mission critical systems" are those that ensure client communication, access to client accounts and trading systems. More specifically, these systems include the office computer systems.

LAMI has primary responsibility for establishing and maintaining its business relationships with its clients. LAMI's brokerage firm/custodian provides the execution, comparison, allocation, clearance and settlement of securities transactions as well as the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

LAMI's brokerage firm/custodian contract provides that the brokerage firm/custodian will maintain a business continuity plan and the capacity to execute that plan.

LAMI's brokerage firm/custodian represents that it backs up LAMI's records at a remote site. LAMI's brokerage firm/custodian represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. It has also confirmed the effectiveness of its 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.

Charles Schwab & Co., Inc. Advisor Services has the following SBD recovery time objectives: within seconds for critical, core trading functions and within seconds for critical, non-core trading functions.

The Firm's Mission Critical Systems

Trading

LAMI uses the electronic order entry system provided by its custodian or another third party to enter trading activity and transactions. If electronic means are not available, LAMI may place orders by fax or telephone, in which case order tickets will still be maintained.

In the event of an internal SBD, LAMI will enter and send records to its brokerage firm by the fastest alternative means available. In the event of an external SBD, LAMI will maintain the order in electronic or paper format, and deliver the order to the brokerage firm by the fastest means available when it resumes operations. In addition, during an internal SBD, LAMI may need to refer its clients to deal directly with its brokerage firm for order entry.

Clients' Access to Funds and Securities

LAMI does not maintain custody of clients' funds or securities, which are maintained at its brokerage firm. In the event of an internal or external SBD, if telephone service and internet service are available, LAMI's investment adviser representatives (IARs) will take customers' orders or instructions from its alternative locations, phone numbers, websites or alternative email addresses and contact its brokerage firm on their behalf. If internet access is available, LAMI will post on its website and Twitter and LinkedIn that clients may access their funds and securities by contacting it.

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

LAMI maintains its primary hard copy books and records and its electronic records at its primary office.

The firm's CCO is responsible for the maintenance of these books and records. LAMI maintains the following document types and forms that are not transmitted to its brokerage firm: Investment Policy Statements, Client Contracts and other related documents.

The firm backs up its electronic records daily by online digital backup and keeps a copy at Carbonite.

In the event of an internal or external SBD that causes the loss of its paper records, LAMI will physically recover them from its back-up site(s). If its primary site is inoperable, LAMI will continue operations from its back-up site or an alternate location. For the loss of electronic records, it will either physically recover the storage media or electronically recover data from its back-up site(s). If its primary site is inoperable, LAMI will continue operations from its back-up site or an alternate location. LAMI obtains the Business Continuity Plans of its electronic storage partners for access to its records in case of a regional event.

Operational Assessments

Operational Risk

In the event of an SBD, LAMI will immediately identify what means will permit it to communicate with its clients, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options LAMI will employ will include its website, telephone voice mail, secure e-mail, etc. In addition, LAMI will retrieve its key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). Employees will establish contact with the firm's Emergency Contacts and communicate key firm directives as they apply to operating the business whether it be from a new location, each employee's residence or an alternative regional location with access to a different power grid from the principal office.

Client Account Information

LAMI currently accesses client account information via its brokerage firm's website. In the event of an internal SBD, LAMI would access client information via fax correspondence, alternate phone systems, etc. LAMI may relocate to its alternative business location(s) if access to the brokerage firm website can be accomplished.

Alternate Communications with Clients, Employees, and Regulators

Clients

LAMI now communicates with its clients using the telephone, e-mail, its Website, fax, U.S. mail, and in person visits at LAMI's or at the other's location. In the event of an SBD, LAMI will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. For example, if LAMI has communicated with a party by e-mail but the Internet is unavailable, LAMI will call the party on the telephone and follow up and where a record is needed with paper copy in the U.S. mail. In the event of an anticipated significant regional business disruption, LAMI will communicate to its clients in advance how to establish contact with it and its personnel or brokerage and custodian prior to the disruptive event occurrence.

Employees

LAMI now communicates with its employees using the telephone, e-mail, and in person. In the event of an SBD, LAMI will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. In the event of key employees being unable to perform their job functions, immediately and for any time period afterwards, LAMI will delegate, if possible, those key functions to other employees.

Regulators

LAMI communicates with its regulators using the telephone, e-mail, fax, U.S. mail, and in person. In the event of an SBD, LAMI will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party.

Regulatory Reporting

LAMI is subject to regulation by the Securities and Exchange Commission (SEC). LAMI now files reports with its regulators using the IARD/CRD System. In the event of an SBD, LAMI will check with the SEC to determine which means of filing are still available to it, and use the means closest in speed and form (written or oral) to its previous filing method. In the event that LAMI cannot contact its regulators, it will continue to file required reports using the communication means available to it and forward those reports at the earliest opportunity.

Regulatory Contact:

Office of Compliance Inspections and Examinations
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549
(202) 551-6200

Investment Adviser Regulation Office, Division of Investment Management
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549
(202) 551-6999