



**Sovereign**  
Wealth Advisors Ltd.

SOVEREIGN WEALTH ADVISORS LLC  
SOVEREIGN COAST WEALTH ADVISORS  
LLC

# **2023 BRANCH CONTINUITY PLAN**

Important: Save this file to your desktop and personal devices.

# **Sovereign Wealth Advisors, LLC**

## **Business Continuity Plan (“BCP”)**

### **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 3 offices located at:

3120 Southwest Freeway, Suite 500  
Houston, Texas 77098

500 N. Shoreline Blvd., Suite 400  
Corpus Christi, Texas 78401

1 Sugar Creek Center Blvd., Suite 340  
Sugar Land, Texas 77478

#### IV. 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 remotely from home.

#### VI. Disaster Recovery Team:

<u>Name</u>	<u>Title</u>	<u>Cell Phone Number</u>
Russell Gebhard	CEO/CCO	713-299-2337
Scott Barber	Wlth. Adv. -Corpus Christi	361-728-3860
Paul Dixon	Mng. Dir. - Sugar Land	281-703-7305
Jackie Ortiz	Administrative Manager	361-655-0259
Diva Silva / Alaina Weber	Administrator	281-684-3375/832-673-7930

#### VII. Responsibilities

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

- Russell Gebhard/Paul Dixon is responsible for documenting computer back-up procedures, i.e., frequency, procedure, person(s) responsible, etc.
- Russell Gebhard/Paul Dixon is responsible for designating back-up storage location(s) and persons responsible to maintain backup data in separate locations.
- Russell Gebhard/Paul Dixon is 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 is 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 is 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 is responsible for determining and assessing back-up systems and/or recovery plans for key vendors and mission critical service providers.
- Russell Gebhard/Paul Dixon is 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: Front of Building

#### **IX.F 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/Paul Dixon 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.F Disruption in Services of Critical Third-Party Vendor**

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, Mr. Gebhard also saves all relevant files on an online cloud that is available at the DRO. Business will continue to run using personal telephones, cloud technology, and internet services available at the DRO.

#### **XI.F Customers' Access to Funds & Securities**

Our firm does not maintain custody of customers' funds or securities. LPL Financial ("LPL"), TD Ameritrade, Charles Schwab, SEI and or CNR (Pershing) 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.F 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.FF 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.FFF 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. Currently, we receive orders from customers via telephone, or in person. If LPL customers are unable to reach the branch to place trades they can contact LPL Financial's Client Service Center at (800) 558-7567

### **XV.FFF Internet Connection**

Our internet carrier is Comcast Business in Houston and the SugarLand Branch office. Our internet carrier is Spectrum Business in the Corpus Christi Branch Office. In the event our internet is unavailable, our DRO has an internet connection that will enable us to access our custodians (LPL, TD/Ameritrade, SEI, Pershing, Charles Schwab) online system as well as the website of our regulators and service providers.

### **XVI.FFF 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 an SBD.

#### **XVII.FF 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 Neal Britt will be responsible for all business functions of Sovereign Wealth Advisors, LLC. Jackie Ortiz will notify all client, key vendors, and regulatory agents of such event and will submit any proper refunds to clients, if applicable.

#### **XVIII.F 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.FF Disclosure of Business Continuity Plan**

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

#### **XX.FF 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.FF 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: 08/22/2023

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Title: Chief Compliance Officer

See Attached Appendices

Sovereign Wealth Advisors LLC  
Firm Continuity Plan Call Tree

**Houston\_Greenway**

NAME	DIRECT	CELL	EXT
Alaina Weber	713-527-3410	832-673-7930	3410
Ben Ock		949-981-4213	
Brandon Gay	713-527-3437	713-922-5286	3437
Charlie Fahy	713-527-3431	281-507-4637	3431
Christine Tang		714-803-7299	
Daniel Eaton	713-527-3405	832-419-6675	3405
David Hanson	713-527-3430	713-819-5067	3430
David Spann	713-527-3432	713-898-5147	3432
Diva Silva	713-527-3400	281-684-3375	3400
Doug Yauger	713-527-3433	713-594-4743	3433
Elisia Pearson	713-527-3406	281-804-7329	3406
Jackie Ortiz	713-527-3412	361-655-0259	3412
Jeff Peskin	713-527-3408	281-451-8826	3408
John Blair	713-527-3456	346-451-3541	3456
Marty Peskin	713-527-3409	713-303-8364	3409
Matt Holder	713-527-3413	713-385-9559	3413
Neal Britt	713-527-3403	713-858-9426	3403
Paul Dixon	713-527-3404	281-703-7305	3404
Paul Wobbe	713-527-3421	713-240-9518	3421
Phillip Evans	713-527-3417	713-725-2019	3417
Robert Lee	713-527-3441	713-515-1178	3441
Ron Meckler	713-527-3443	281-221-0111	3443
Rusty Gebhard	713-527-3401	713-299-2337	3401
Sam Drumond	713-527-3440	617-959-2563	3440
Steve McHale	713-527-3442	281-460-4522	3442
Stephen Petty	713-527-3424	281-382-2855	3424
Teresa Theobald	713-527-3439	713-291-1951	3439
William Vaseliades	832-875-6921		

**Sugar Land**

Brad Bowman	713-527-3452	713-598-4776	3452
Jim Hawryluk	713-527-3451	713-502-5526	3451
Kimberly Meade	713-527-3450	512-422-7191	3450
Courtney James	713-527-3453	409-350-8800	3453

**Corpus Christi**

Bill Bevill	361-888-8700	361-779-6051	
Scott Barber	361-883-1363	361-728-3860	

## **APPENDIX B**

### **CRITICAL VENDOR CONTACT SHEET**

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#### **Regulators & Compliance**

##### **Securities & Exchange Commission:**

100 F Street, NE, Washington D.C., 20549

(P): 202-942-0644

(P): 1-800-732-0330

(F): 202-551-8090

CRD#: 188524

##### **FINRA:**

1100 Poydras Street, Suite 850, Energy Centre

New Orleans, LA 70163

(P): 240-386-4848

(F): 504-522-6527

[www.finra.org/index.htm](http://www.finra.org/index.htm)



# FIRE SAFETY CHECKLIST

In the case of a fire, you may have as little two minutes to escape. Smoke alarms can give an early warning, to activate your fire safety plan. To ensure, all employees have the necessary resources and knowledge to protect themselves and others in a fire situation and guarantee a fast recovery, follow these tips:

## Before a Fire

- ☐ Install a smoke alarm in every room and level of your house of building and test once a month. Replace batteries once a year.
- ☐ Learn how to use a fire extinguisher.
- ☐ Educate you children on smoke alarms and what to do if they hear it.
- ☐ Have at least two planned exits for each person and designated meeting spot outside away from where the fire would occur.
- ☐ Confirm everyone knows how to call 911 for help.
- ☐ Set emergency contacts and communications to ensure all members know who to contact if they cannot find each other.
- ☐ Practice: STOP, DROP, and ROLL.
- ☐ Practice your fire safety plan at least twice a year.

## During a Fire

- ☐ Know the building's evacuation plan.
- ☐ Evacuate calmly and quickly.  
GET OUT, STAY OUT, and CALL 911.  
Yell "FIRE" to alert others and go outside immediately. Use stairs only, not elevators.
- ☐ Never open doors that are warm to touch.  
If they are use your second way out.
- ☐ If you encounter smoke, stay low to the floor.
- ☐ If smoke or fire block your exits, stay in the room with the door closed. Place a wet towel under the door and call the fire department or 911. Open a window and shine a flashlight or wave a cloth to indicate you need help.
- ☐ Once outside, go to your meeting place and/or follow the emergency contact plan.

## After a Fire

- ☐ Call 911. Cool and cover burns to reduce injury or infection.
- ☐ Dispose of any food exposed to heat, smoke, or soot.
- ☐ Check in with family and friends to ensure their safety and yours.
- ☐ Stay out of the building until local fire authorities say it is safe to enter.

## Fire Safety Tips

- ☐ Install smoke alarms on every level of your building/house.
- ☐ Test Smoke alarms in every month to ensure they are working and the batteries are not dead.
- ☐ Plan and practice a fire escape plan twice a year.
- ☐ If a fire occurs, GET OUT, STAY OUT, and CALL FOR HELP. Never go back inside for anything or anyone.

**EXIT**



## If Your Clothes Catch On Fire:

**STOP** where you are

**DROP** to the ground, covering your face.

**ROLL** back and forth until the flames go out. Running makes the fire burn faster.

## Fire Safe Habits:

- Keep items that can catch on fire 3 feet away from anything that gets hot.
- Smoking materials is the most common reason and starter of home fires. Please use precautions if you smoke.
- Educate and talk with your children about fire danger and keep matches and lighters out of their reach.
- Be cautious and aware of burning candles. Do NOT leave them unattended.

## Know the Risks



There is a house fire **every ten seconds** in the U.S.



Home fires can spread in as little as **thirty seconds**.



Make sure that your family has a **fire escape plan** for your home and practice it regularly.



**Remember:** If there's ever a fire, GET OUT, STAY OUT and CALL for help.



Cooking is the **leading cause** of house fires.



More than **15,000** fires a year are started by clothes dryers. Clean the vents at least once a year.

# POWER OUTAGE CHECKLIST

A Power Outage is an unexpected loss of electric power. Power Outages may interrupt communication, transportation, water, businesses, and result in spoiled food and water contamination. It is hard to predict when these events will happen but to ensure, that these interruptions, do not affect our ability to serve our customers here are some tips and strategies:

## Before a Power Outage

- ☐ Take note of how many electrical appliances you need that run on electricity.
- ☐ Have an Emergency Kit.
- ☐ Have an electrical maintenance manager onsite or on call for immediate help.
- ☐ Be familiar with what equipment can and cannot be turned off.
- ☐ Have working batteries.
- ☐ Functional flashlights, for every person, with extra batteries.
- ☐ Register for text notifications of weather alerts and warnings.
- ☐ Keep a thermometer in the refrigerator and freezer to keep track of the temperature when the power comes back. Food should be disposed if temperature is 40° Fahrenheit (4° Celsius).
- ☐ Have a cooler and ice on hand for keeping food cold.
- ☐ Maintain gas tanks with at least a half of tank of gas.
- ☐ Keep cell phones and electrical equipment charged.
- ☐ Consider getting a generator. Confirm its power is sufficient for your home/ building and that you know how to operate it.
- ☐ Check or install a carbon monoxide detector.

## During a Power Outage

- ☐ Unplug appliances, equipment, and electronics to avoid an electrical surge when power resumes.
- ☐ Keep freezer and refrigerator closed. Food will stay cold in the fridge for approximately 4 hours, the freezer for 48 hours. Use coolers with ice if necessary.
- ☐ Use flashlights, not candles.
- ☐ Try to stay indoors and not on the road as the traffic lights will be disrupted and traffic will be heavy.
- ☐ Have non-perishable food.
- ☐ Avoid carbon monoxide poisoning by keeping stove and gas appliances off and generators outside.
- ☐ Leave one light on so you are aware when the power comes back.
- ☐ Use the stairs, not the elevator, as the elevator will be disabled.

## Important

- ☐ It is important for the employees to know the building, equipment, and the emergency plan for what they need to do in these instances!

## After a Power Outage

- ☐ Do not touch fallen power lines. Report collapsed power lines to your utility company.
- ☐ Dispose of any food exposed to 40° Fahrenheit (4° Celsius) and any food with a suspicious odor or color. If unsure, throw it out, to ensure that you do not consume contaminated food.
- ☐ Check in with family and friends to ensure their safety and yours.

## Preparedness Tips

- ☐ **STEP 1: Emergency Kit**
  - Have copies of important documents, 1 Gallon of water per day per person, flashlights, batteries, non-perishable food, and first aid kit.
- ☐ **STEP 2: Make a Plan**
  - Place to meetup outside house and or outside, practice plan 2 times a year with entire family include pets.
- ☐ **STEP 3: Be informed**
  - Monitor the news, at one family member should be CPR certified.



- Turn off lights, computers, and other devices when they are not being used.
- Use energy-efficient halogen, compact fluorescent lights, or LED bulbs.
- Go Easy on the A.C.

# Hurricane

## Preparedness Checklist

Hurricanes and tropical storms are rotating storms that form over warm waters. These storms bring high winds, heavy rain, storm surge (rise in water level), flooding and tornadoes. Climate change has caused hurricanes to strengthen faster and bring heavier rainfall. The most common cause of death during a hurricane is from drowning. These storms are dangerous and can damage places far inland. But we can take action to prepare. Prepare now to protect yourself, your loved ones and your home.



## What to Do: Before

### Make Plans to Stay Safe

Determine your best protection from high winds and flooding.  
Have a plan to evacuate and a plan to shelter safely.



#### If advised to evacuate, do so immediately

- You may have to leave your home quickly and go to a safe place.
- Know where you will go, how you will get there and where you will stay.
- Plan well in advance if you will need help leaving or use public transportation.
- Mobile, manufactured, trailer homes and recreational vehicles (RVs) are not safe in high wind events. Plan ahead by preparing to evacuate to a safe location.



#### Plan to shelter safely

- Be ready to live without power, water, gas, phone and internet for a long time.
- Practice going to a designated safe shelter for high winds. The next best protection is a small room with no windows on the lowest level of a sturdy building that is not likely to flood.
- Be aware that flooding can happen quickly. Have a plan to evacuate fast before floodwaters reach you.
- Create a personal support team of people you may assist and who can assist you.



#### Plan to stay connected

- Sign up for free emergency alerts from your local government.
- Plan to monitor local weather and news.
- Have a backup battery or a way to charge your cell phone.
- Have a battery-powered radio during a power outage.
- Understand the types of alerts that you may receive and have a plan to respond when you receive them.
  - A WATCH means **Be Prepared!**
  - A WARNING means **Take Action!**

- Alerts you may receive include: Hurricane Watch & Warning, Tropical Storm Watch & Warning, Extreme Wind Warning, Storm Surge Watch & Warning, Flash Flood Watch & Warning, Flood Watch & Warning.



### Learn emergency skills

- Learn First Aid and CPR.
- Be ready to live without power. Utilities may be offline. Be ready to live without power, gas and water. Plan for your electrical needs, including cell phones and medical equipment. Talk to your doctor. Plan for backup power.



### Gather emergency supplies

- Gather food, water and medicine. Stores and pharmacies might be closed. Organize supplies into a Go-Kit and a Stay-at-Home Kit.
- Go-Kit: at least three days of supplies that you can carry with you. Include backup batteries and chargers for your devices (cell phone, CPAP, wheelchair, etc.)
  - Stay-at-Home Kit: at least two weeks of supplies.
  - Have a 1-month supply of medication in a child-proof container and medical supplies or equipment.
  - Keep personal, financial and medical records safe and easy to access (hard copies or securely backed up). Consider keeping a list of your medications and dosages on a small card to carry with you.



### Protect Your Home

#### Wind

- Secure or bring inside outdoor items, such as lawn furniture and trash cans, that could be picked up by high winds and hurt someone.
- Anchor objects that would be unsafe to bring inside, such as gas grills and propane tanks.
- Trim or remove trees close enough to fall on your home.
- Protect windows with permanent storm shutters or sheeting.



## Protect Your Home

### Flood

- Clean out drains, gutters and downspouts.
- Stockpile protective materials such as plastic sheeting and sandbags.
- Consider installing a sump pump with battery backup.
- Consider elevating the heating system, water heater and electric panel.
- Review insurance policies with your agency.

## What to Do: During



### If local authorities advise you to evacuate, go right away.

- Bring your Go-Kit.
- Follow evacuation routes and do not try to take shortcuts because they may be blocked.
- Check with local officials for shelter locations. Download the Red Cross Emergency App to find shelters near you.



### Determine your best protection for high winds and flooding.

- Take shelter in a designated storm shelter or an interior room for high winds.
- Stay away from glass windows and doors.
- Move to higher ground before flooding begins.

**Never walk, swim, or drive through floodwater.**

**Remember, Turn Around! Don't Drown!**

## What to Do: After



### Stay Safe

- Wait for officials to say it is safe before going back home.
- Avoid damaged or fallen power lines, poles and downed wires. They can electrocute you.
- Do not touch floodwaters because they may contain sewage, bacteria and chemicals that can make you ill.
- If power is out, use flashlights or battery-powered lanterns to reduce fire risk.
- Be aware of carbon monoxide poisoning. Prevent carbon monoxide poisoning. Gasoline, propane, natural gas or charcoal-burning devices should never be used inside a home, basement, garage, tent or camper – or even outside near an open window. Carbon monoxide can't be seen or smelled, but it can kill you fast. If you start to feel sick, dizzy or weak, **get to fresh air right away – do not delay.**



### Cleanup Safely

- Wear appropriate protective equipment including gloves, goggles and boots.
- Clean and disinfect everything that got wet.
- When cleaning heavy debris, work with a partner.
- Make sure that you have proper training before using equipment, such as chainsaws.
- Heart attacks are a leading cause of deaths after a hurricane. Be mindful of overworking.
- Cleaning up is a big job. Take breaks and take care of yourself.



### Stay Healthy

- **When in doubt, throw it out!** Throw out food that got wet or warm.
- Ask your healthcare provider or doctor about refrigerated medicines.
- Hurricanes and flooding can make drinking water unsafe. Monitor your local health department for information about drinking water safety.



### Take Care of Yourself

- It's normal to have a lot of bad feelings, stress or anxiety.
- Eat healthy food and get enough sleep to help you deal with stress.
- You can contact the Disaster Distress Helpline for free if you need to talk to someone. Call or text **1-800-985-5990**.

Prepare so you can protect. | For more information, visit [redcross.org/prepare](https://redcross.org/prepare) | Download the Emergency App

