



Richfield Orion International, Inc.

Business Continuity Plan – Update

December 2010

Business Continuity Plan

The Firm has developed a Business Continuity Plan to provide procedures for response and recovery in the event of a significant business disruption. The purpose of the Plan is to identify responsible personnel in the event of a disaster; safeguard employees' lives and firm property; evaluate the situation and initiate appropriate action; recover and resume operations to allow continuation of business; provide customers with access to their funds and securities; and protect books and records. The Plan was developed considering the types of business conducted, systems critical to support business, and geographic dispersion of offices and personnel.

1. Emergency Contact and Response Team

The firm has provided FINRA with the contact information for the two emergency contact persons: J. Brett Stuart, the firm's Chief Executive and Chief Compliance Officer, 5203 Apache Creek Rd, Castle Rock, Colorado 720-240-8055, email address Brett.Stuart@RichfieldOrion.com, with a fax number of 720-921-7913 and Debra Snetting, company principal, located at 5255 Villa Circle, Colorado Springs, Colorado, 720-231-4103, email address Debra.Snetting@RichfieldOrion.com, with a fax number of 720-921-7913 through the FINRA Contact System. J. Brett Stuart will promptly notify FINRA of any change in this information through FCS and will review, and if necessary update, this information within 17 business days after the end of each calendar year.

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

The Firm has designed an Emergency Response Team that is responsible for implementing necessary procedures included in this Plan. The Response Team's action will depend on the nature and scope of the disruption. The "first responder" has the primary responsibility for taking action, and the "secondary responder" acts as a back-up in the event the first responder is unable to act. Where feasible, the two responders are located in different office locations.

Emergency Response Team

Action	First Responder/Location	Secondary Responder/Location
Contact emergency services such as police, fire department	Debra K. Snetting, Colorado Springs, CO	J. Brett Stuart, Castle Rock, CO
Establish off-site command center and notify employees	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
Contact employees regarding Plan initiatives	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
For affected offices, evaluate business disruption and transfer employees and business operations to other locations	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
Appoint individuals to manage business areas where needed	J. Brett Stuart, Castle Rock, CO	J. Brett Stuart, Castle Rock, CO
Determined financial and	J. Brett Stuart,	Debra K. Snetting,

credit risk and contact banks and other counter-parties, if necessary, to secure financing to continue operations	Castle Rock, CO	Colorado Springs, CO
Notify regulators in the event of a capital deficiency	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
Interface with SIPC if liquidation of business if liquidated	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
Contact critical service providers	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
Transfer mission critical functions that are disrupted	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
Initiate alternative customer communications systems or procedures	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
Notify customers regarding alternative access to funds and securities	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
Recover back-up records when primary records are destroyed or inaccessible	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO
Contact regulators and notify them of contact persons and recovery plans	J. Brett Stuart, Castle Rock, CO	Debra K. Snetting, Colorado Springs, CO

2. **Firm Policy**

Our firm'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 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.

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

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a 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.

B. **Approval and Execution Authority**

J. Brett Stuart, the firm's Chief Executive Officer, a registered principal, is responsible for approving the plan and for conducting the required annual review. He has the authority to execute this BCP.

C. **Plan Location and Access**

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on the firm's hard drives back-up files.

Rule: FINRA Rule 4370(b), (d) and (e).

3. **Business Description**

Our firm conducts business in equity, fixed income, mutual fund, variable insurance products and private placement securities. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only retail customers.

Our clearing firm is:

Devin Benton – Southwest Securities	Clearing firm	214-859-6320	dbenton@swst.com	1201 Elm Street, Ste. 3500, Dallas, TX 75270
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Our clearing firm has also given us the following alternative contact in the event it cannot be reached:

Trading desk – Southwest Securities	Clearing firm	412-859-1080	listedtrading@swst.com	1201 Elm Street, Ste. 3500, Dallas, TX 75270
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4. **Office Locations**

The firm's home office is located at 5353 N. Union Blvd, Suite G-1, Colorado Springs, Colorado. The phone number is 720-240-8055. Order taking may be done at this location.

Attached as Attachment --- is a complete list of all office locations and registered branch offices of the firm.

5. **Alternative Business Locations**

b. In the event employees can no longer conduct business at one of the Firm's office locations, the following actions may be taken:

- i. Transfer employees to the closest unaffected office location and notify personnel, or move office hard-copy and electronic data to each representative's or employee's home;
- ii. Transfer critical systems to another office or a back-up firm or system;
- iii. Transfer business operations to another Firm office unaffected by the disruption;
- iv. Transfer business operations to a different broker-dealer or other entity.

c. A list of offices appears as Attachment C to this document.

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

6. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, Southwest Securities. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our Web access is available, our firm will post on our website that customers may access their funds and securities by contacting Southwest Securities at 214-859-6320. The firm will make this information available to customers through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

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

When customer access to funds and securities is impacted by a significant business disruption, customers will be notified by whatever expedient means is available (telephone, e-mail, etc.) regarding who may be contacted to request funds or securities. If ROI is unable to continue business operations, customers will be notified of an alternative financial institution where they may conduct business and access their funds and securities.

7. Data Backup

The Firm maintains its books and records in both hard copy and electronic format. The Book and Records chart (Appendix B to the Plan) indicates whether records are maintained in hard copy or electronic form; location of primary records; and backup site for records.

In the event of internal or external significant business disruption that causes the loss of the Firm's records (whether hard copy or electronic records), back-up records will be recovered from the back-up site.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Rule: FINRA Rule 4370(c)(1).

8. Financial and Operational Assessments

b. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our 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 we will employ will include our website, telephone voice mail, and secure email. In addition, we will retrieve our key activity records as described in the section above,

Rules: *FINRA Rules 4370(c)(3),(c)(4), (c)(5), (c)(7), (c)(9 & (g)(2)).*

c. 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 and investors 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 and immediately take appropriate steps as directed by liaison personnel at FINRA District 3.

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

9. 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. More specifically, these systems include clearing all trades and executions through Southwest Securities, customer account electronic records being maintained off-site at TechMate in Littleton, Colorado, and diverse records being maintained at all separate offices of the firm's representatives.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order. Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents

that it will advise us of any material changes to its plan that might affect our ability to maintain our business and has presented us with an executive summary of its plan. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provides us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm 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. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing, and it has confirmed that it tests its back-up arrangements.

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. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period within 4 hours, and resumption time within the same business day.

The Chief Compliance Officer will periodically review our clearing firm's capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

A. Our Firm's Mission Critical Systems

1. **Order Taking**

Currently, our firm receives orders from customers via telephone through individual branch offices. During an SBD, either internal or external, all individual branch offices will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Each branch office is directed to directly contact the firm's clearing firm should the home office be unreachable. Customers will be informed of alternatives by phone or email. If necessary, we will advise our customers to place orders directly with our clearing firm at Southwest Securities, Trading Desk at **214-859-1080**

2. Order Entry

Currently, our firm enters orders by recording them on paper and electronically and sending them to our clearing firm electronically or telephonically. Individual branch offices and clients have been informed that orders may be entered directly via our clearing firm at Southwest Securities, Trading Desk at **214-859-1080**.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include fax and email. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

3. Order Execution

We currently execute orders via an online trading program provided by our clearing firm, Southwest Securities. In the event of an internal SBD, we would contact the clearing firm's Trading Desk; order entry through execution and confirmation is processed through our clearing firm.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

Rules: FINRA Rules 3510(c)(2) & (g)(1).

10. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using the telephone, email, our website, fax, U.S. mail and in-person visits at our firm or another location. 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 oral form 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 email 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.

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

B. Employees and Representatives

We now communicate with our associates using, *telephone, email, 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 oral form to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is any informed firm principal.

Caller	Call Recipients
<i>Debra K. Snetting</i>	<i>All registered representatives</i>
<i>In the alternative, J. Brett Stuart</i>	<i>All registered representatives</i>

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

C. Regulators

We are currently members of FINRA and the MSRB. We communicate with our regulators using telephone, email, fax, U.S. 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 oral form to the means that we have used in the past to communicate with the other party.

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

9. Critical Business Constituents, Banks, and Counter-Parties

A. Business Constituents

We have contacted our critical 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.

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

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: US Bank, available through any bank. The bank maintaining our Proprietary Account of Introducing Brokers/Dealers (PAIB account) is Southwest Securities. The firm does not rely on any outside source of funds for its daily operation.

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

C. Counter-Parties

The firm does not maintain any critical relationship with parties not already reviewed above.

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

10. Regulatory Reporting

Our firm is subject to regulation by FINRA, the SEC and the MSRB. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, email 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 to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

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

11. Disclosure of Continuity Plan

Information about the Firm's Business Continuity Plan is provided to customers as follows:

- a. At the time of account opening;
- b. On the Firm's web site www.RichfieldOrion.com;
- c. Upon request, by mail.
- d. Annually by mail or email from each representative.

12. Updates and Annual Review

Our 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, our firm will review this BCP annually, during December and January of each year to modify it for any changes in our operations, structure, business or location or those of our clearing firm.

We, the undersigned firm principals, have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Rule: FINRA Rule 4370(d).

J. Brett Stuart, CEO

Debra K. Snetting, Corporate Principal

Attachment C

Branch Offices and Supervising OSJ

Registered Representatives:	Office Location:	Type of Office:	Designated Supervisor:	Person to Explain Office Records:	Business Conducted:
Snetting, Debra	Colorado Springs, CO	OSJ	J. Brett Stuart	J. Brett Stuart	GP, GS, MP, SI, IB
Stuart J. Brett	Colorado Springs, CO	OSJ	J. Brett Stuart	J. Brett Stuart	GP, GS, MP, SI, FN, OP, IB
Jackson, Leete	Dallas, TX	BR	J. Brett Stuart	J. Brett Stuart	GP, GS, IB
Urech, Ryan	Dallas, TX	BR	J. Brett Stuart	J. Brett Stuart	GP, GS, IB
Margolin, Adam	Denver, CO	BR	J. Brett Stuart	J. Brett Stuart	GS, GP, IB
Group, Doug	Broomfield, CO	BR	J. Brett Stuart	J. Brett Stuart	GP, GS, OP, AG, SI, IB

Registration Categories:

GP General Securities Principal (S24)

GS Full Registration/General Securities Representatives (S7)

IP Investment Company and Variable Contracts Products Principal (S26)

IR Investment Company and Variable Contracts Products Rep. (S6)

DR Direct Participation Program Representative (S22)

FN Financial and Operations Principal (S27)

MP Municipal Securities Principal (S53)

OP Registered Options Principal (S4)

PG Government Securities Principal (S73)

RG Government Securities Principal (S72)

IB Investment Banking (S79)

BOOKS AND RECORDS APPENDIX B

Business Continuity Plan Date of Last Review:
December 2010

Note: This chart summarizes ROI’s books and records, whether kept in hard copy or electronic form, where primary records are located, and where the records are retained at a back-up site.

Description of Record	Retention Requirement under amended Rules 17a-3 and 17a-4	Hard Copy	Electronic	Location of Primary Records	Back-up drive: secured
Blotters (or other original entry records) containing itemized daily records of securities purchases and sales, securities receipts and deliveries, cash receipts and disbursements, and other debits and credits. (Required by Rule 17a-3(a) (1))	Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4 (a))	X	X	Southwest Securities & WinOps	Back-up drive: secured
Ledgers reflecting assets, liabilities, income, expense and capital accounts, (Required by Rule 17a-3 (a)(2))	Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a))	X	X	ROI Home Office,	Back-up drive: secured
Ledgers itemizing for each customer and firm account all purchases, sales, receipts, deliveries of securities and commodities, and other debits and credits. (Required by Rule 17a-3 (a)(3))	Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a))	X	X	ROI home office and OSJ files SWS confirmations on Back-up drive; secured	Product vendors, clearing firm, and product sponsors
Order tickets for brokerage orders (Required by Rule 17a-3(a)(6))	Three (3), with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1))	X		ROI home office and OSJ files	Clearing firm
Copies of confirmations (Required by Rule 17a-3(a)(8))	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1))	X		ROI home office and OSJ files	Clearing firm and product sponsors
Records of beneficial ownership of cash and margin accounts. (Required by Rule 17a-3(a)(9))	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1))	X		ROI home office and OSJ files	Clearing firm and product sponsors
Trial balances and computation of aggregate indebtedness and net capital. (Required by Rule 17a-3(a)(11))	Three (3) years, with the first two (2) in an easily accessible place. (Rule 17a-4(b)(5))	X	X	ROI home office, Back-up drive; secured	Clearing firm, FINRA
Records pertaining to each “associated person” (Required by Rule 17a-3(a)(12))	Three (3) years, with the first two (2) in an easily accessible place after termination of employment and other connection with the firm. (Rule 17a-4(e)(1))	X	X	ROI home office files and ROI computers	Back-up drive; secured
Fingerprint exemption notices (Required by Rule 17a-3(a)(13) and 17f-2(d))	Three (3) years, with the first two (2) in an easily accessible place after termination of employment or association with the firm. (Rule 17a-4(e)(2))	X		ROI home office files	FBI
Fingerprint exemption notices. (Required by Rules 17a-3(a)(15) and 17f-2 (e))	Retention, in an easily accessible place, for the life of the enterprise.(Rule 17a-4(e)(3))	X		ROI home office files	FINRA
Account record information. (Required by Rule 17a-3(a)(17))	Six (6) years, in an easily accessible place, after account closing or after date information replaced or updated. (Rule 17a-4(e)(5))	X	X	ROI home office and OSJ files	Clearing firm, product sponsors, Back-up drive; secured
Customer complaint records. (Required by Rule 17a-3(a)(18))	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1))	X		ROI home office files	OSJ files, FINRA backup of written complaints

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BOOKS AND RECORDS APPENDIX B

Business Continuity Plan Date of Last Review:

December 2010

Note: This chart summarizes ROI's books and records, whether kept in hard copy or electronic form, where primary records are located, and where the records are retained at a back-up site.

Description of Record	Retention Requirement under amended Rules 17a-3 and 17a-4	Hard Copy	Electronic	Location of Primary Records	Back-up drive: secured
Associated person compensation records, (Required by Rule 17a-3(a)(19))	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1))	X	X	ROI home office files	Back-up drive; secured
Records of approvals for public communications. (Required by Rule 17a-3(a)(20))	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1))	X		ROI home office and OSJ file	No backup, if records destroyed ROI must resubmit
Records identifying persons capable of explaining the firm's records. (Required by Rule 17-3(a)(21))	Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a))		X	WSP Manual	WSP Manual backup,
Records identifying principals. (Required by Rule 17a-3(a)(22))	Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a))		X	WSP Manual	WSP Manual backup, Back-up drive; secured
Retention of Firm's Financial and Other Business Records					
Checkbooks, bank statements, cancelled checks, cash reconciliations	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(2))	X	X	ROI home office files, and Quick Books, Back-up drive; secured	US Bank
Bills receivable or payable, paid or unpaid.	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(3))	X		ROI home office	Vendors
Trial balances, Computations of aggregate indebtedness and net capital, financial statements, branch office reconciliations, internal audit working papers.	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(5))	X	X	ROI home office files, and Quick Book	Back-up drive; secured
All agreements relating to the firm's business.	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(7))	X		ROI home office files	Product sponsors, clearing firm, and other parties to agreements
Certain records supporting the firm's annual financial statements	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(8))	X	X	ROI home office files, and Quick Books	Back-up drive; secured
Retention of Communications					
Communications sent or received by the firm, including inter-office and email communications.	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(4))	X	X	ROI home office and OSJ files	Back-up drive; secured Smarsh system
"Approvals" of communications the firm sends.	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(4))	X		ROI home office and OSJ files	Back-up drive; secured
Communications that must be kept under SRO rules on "communications with the public" including any advertising actually published or otherwise distributed to the public.	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(4))	X		ROI home office and OSJ files	Back-up drive; secured
Sales scripts used in communication with the public (even though the scripts themselves are typically not delivered to the public).	Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(4))	X		ROI home office and OSJ files	Back-up drive; secured

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BOOKS AND RECORDS APPENDIX B

Business Continuity Plan Date of Last Review:

December 2010

Note: This chart summarizes ROI's books and records, whether kept in hard copy or electronic form, where primary records are located, and where the records are retained at a back-up site.

Description of Record	Retention Requirement under amended Rules 17a-3 and 17a-4	Hard Copy	Electronic	Location of Primary Records	Back-up drive: secured
Retention of Account Records					
Account guarantees, powers of attorney, other documents granting discretionary authority, resolutions allowing agent to act for corporation	Three (3) years, with the first two (2) years in an easily accessible place. (Rules 17a-4(b)(7))	X		ROI home office and OSJ files	Clearing firm and product sponsors
All agreements concerning any account	Three (3) years, with the first two (2) years in an easily accessible place. (Rules 17a-4(b)(7))	X		ROI home office and OSJ files	Clearing firm and product sponsors
Customer account cards and records concerning terms and conditions of account opening and maintenance	Six (6) years after account closing. (Rule 17a-4))	X	X	ROI home office and OSJ files	WinOps, Back-up drive; secured
Retention of Organizational Documents					
All firm partnership articles, articles of incorporation or charter, minutes, books, and stock certificate books.	Retention for the life of the firm and for the life of any successor firm (Rule 17a-4(d))	X		ROI home office	ROI Fireproof safe
Forms BD (registering a broker dealer under 17 C.F.R. §249.501) and BDW (withdrawing a broker dealer registration under 17 C.F.R. . §249.501a), and amendments to these forms	Retention for the life of the firm and for the life of any successor firm. (Rule 17a-4(d))	X	X	ROI home office	FINRA website
Registrations documents and licenses with all securities regulators.	Retention for the life of the firm and for the life of any successor firm. (Rule 17a-4(d))	X		ROI home office	Regulators copies
Retention of Reports					
Reports requested or required from the firm by any securities regulator under any order or settlement with the regulator.	Three (3) years, in an easily accessible place after the date of the report. (Rules 17a-4(e)(6))	X		ROI home office computers	Ability to rerun reports and regulators copies
Examination reports by any securities regulator.	Three (3) years, in an easily accessible place after the date of the report. (Rule 17a-4(e)(6))	X		ROI home office files	Regulators
Reports of unusual activity in customer accounts (or the ability to regenerate these reports from a computer system).	Eighteen (18) months, in an easily accessible place, after the date of the report. (Rule 17a-4(e)(8))	X	X	ROI home office and OSJ files	Rerun reports from WinOps back-up drive; secured
Retention of Compliance, Supervisory and Procedures Manual					
Compliance, supervisory and procedures manuals.	Three (3) years in an easily accessible place after termination of use of the manual(Rule 17a-4(e)(7))		X	ROI Website	Back-up drive; secured
Updates, modifications and revisions to compliance, supervisory and procedures manual.	Three (3) years in an easily accessible place after termination of use of the manual. (Rule 17a-4(e) (7)).	X	X	ROI home office computers	Back-up drive; secured

MISSION CRITICAL SYSTEMS APPENDIX: A

Business Continuity Plan, Date of Last Review:
December 2010

Functions	System Name or Procedure	Third Party Providing System (if applicable)	Back-up or Alternate System
Retail order taking – clearing firm business	Southwest Securities 214-859-5135		Place orders directly with clearing firm
Direct business	Approval thru home office/WinOps		Manual approval through OSJ
Retail order entry	Southwest Securities	Southwest Securities	Ph: 214-859-1080, Fax: 214-742-1209
Corporate fixed income trading	Southwest Securities	Southwest Securities	Ph: 214-859-6699, Fax: 214-859-6628
Municipal bond trading	Southwest Securities	Southwest Securities	Ph: 214-859-1510
Options trading	Southwest Securities	Southwest Securities	Ph: 214-859-5147, Fax: 214-859-5623
Receipts and disbursements	Southwest Securities	Southwest Securities	Ph: 314-859-5110, Fax: 214-859-6885
Maintenance of customer accounts	Southwest Securities, product sponsors	Southwest Securities, sponsors	SWS Ph: 214-859-9363, Fax: 214-859-6038 or direct sponsor
Access to customer accounts	Southwest Securities, product sponsors	Southwest Securities	SWS Ph: 214-859-5360, Fax: 214-859-6095 or direct sponsor
Delivery of funds	Forward to clearing firm or product sponsors	Southwest Securities	OSJs forward to clearing firm or sponsor
Website & email support		Smarsh Systems	(866) 762-7741 option 2
Transaction and statement review	Southwest Securities	Southwest Securities	Manual review of hard copy confirmation statements

EMERGENCY CONTACT LIST AND KEY EMPLOYEES, APPENDIX: D

Business Continuity Plan, Date of Last Review:

December 2010

Note: This list includes contact information for key vendors or service providers; regulators; insurance carriers; banks, attorneys; and other critical contacts in the event of a major business disruption. This form is NOT INTENDED FOR INCLUSION IN THE WSP MANUAL since it may require frequent updating.

Name	Affiliation	Phone Number Land	Phone Number Cell	Email	Other Contact Information
Trading desk – Southwest Securities	Clearing firm	412-859-1080	none	listedtrading@swst.com	1201 Elm Street, Ste. 3500, Dallas, TX 75270
Devin Benton – Southwest Securities	Clearing firm	214-859-6320	none	dbenton@swst.com	1201 Elm Street, Ste. 3500, Dallas, TX 75270
State Farm – Tom Harbert	Insurance carrier	719-594-4500	none	tom@tomharbert.com	1555 Promotory Cr, Greeley, CO 80638
Frank Crystal & Co.	Fidelity Bond	212-504-5987	none	corderok@fcystal.com	32 Old Slip, NY, NY 10005
Financial Advisors Assurance Select Risk Retention Group-Doug Schriner	Insurance broker E&O	303-597-1987	none	dschriner@harrisondouglas.net	7469 West Mead Blvd., Ste. 170, Las Vegas, NV 89128
WinOps (Techmate)	Consolidated statement	303-356-5962	none	techmate@opsplus.com	6657 W. Ottawa Ave., Ste. A-10, Littleton, CO 80128
US Bank	Bank	719-872-2657	none	none	6050 Stetson Hills Blvd., Ste. B, Colorado Springs, CO 80922
Stockman, Kast, Ryan, and Co.	CPA	719-630-1186	none	dkast@skrco.com	102 North Cascade Ave., Ste. 400, Colorado Springs, CO 80918
Shane Sutherland	FINRA Denver	303-446-3100	none	terrence.sutherland@finra.org	4600 S. Syracuse St., Ste. 1400, Denver, CO 80237
SEC, Denver	Regulator	303-844-1000	none	snyder@sec.gov	Denver, CO 80237
Stuart, J. Brett	CEO/President	720-240-8055	720-240-8055	Brett.stuart@richfieldorion.com	5353 N. Union Blvd., Ste. G-1, Colorado Springs, CO 80918
Snetting, Debra K.	Principal	720-231-4103	720-231-4103	Debra.snetting@richfieldorion.com	5353 N. Union Blvd., Ste. G-1, Colorado Springs, CO 80918
Group, Doug	Registered Rep	303-451-5710	303-513-4190	Doug.group@richfieldorion.com	1395 W. 139 th Pl., Broomfield, DO 80023
Margolin, Adam	Registered Rep	303-951-1179	303-951-1179	Adam.margolin@richfieldorion.com	1127 Auraria Pkwy, Unit 402B, Denver, CO 80204
Cooper, Peter	Registered Rep	847-719-1234		Peter.Cooper@richfieldorion.com	534 Prairie Ln, Lake Zurich, IL
Jackson, Leete	Registered Rep	214-315-5175		Leete.Jackson@richfieldorion.com	5300 W. Plano Pkwy, Ste 100, Dallas, TX
Urech, Ryan	Registered Rep	214-217-0033		Ryan.Urech@averefinancial.com	9301 N. Central Pkwy, 360, Dallas, TX
Slomberg, Stephen	Registered Rep	330-807-3329		Stephen.Slomberg@richfieldorion.com	1697 Hibbard Dr. Stow, OH 44224
McColly, Rachell	Registered Rep	208-639-4488		Rachell.McColly@richfieldorion.com	1300 E. State Street, Ste 103, Eagle ID

SIPC LIQUIDATION CONTACT LIST, ATTACHMENT B

Business Continuity Plan, Date of Last Review

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Name	Affiliation	Phone Number-Land	Phone Number-Cell	Email	Other Contact Information
Stuart, J. Brett	CEO/President	720-240-8055	720-240-8055	Brett.Stuart@RichfieldOrion.com	5353 N. Union Blvd., Ste. G-1, Colorado Springs, CO 80918
Snetting, Debra K.	CCO	720-231-4103	720-231-4103	Debra.Snetting@RichfieldOrion.com	5353 N. Union Blvd., Ste. G-1, Colorado Springs, CO 80918