

SELECT PORTFOLIO MANAGEMENT, INC.

Business Continuity Plan (BCP)

I. Emergency Contact Persons

Our firm's three emergency contact persons are: **Carin R. Amaradio**, office phone (949) 975-7900 or cell phone (949) 903-0488 camaradio@aol.com; **Laurie A. Thompson**, office phone (949) 975-7900 or cell phone (949) 500-6534 laurie.thompson@selectportfolio.com; and **Mark E. Goldsmith**, office phone (949) 975-7900 or cell phone (949) 463-7020 mgoldsm21@aol.com.

II. 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 the clearing firm of our affiliate broker-dealer, Securities Equity Group.

B. Approval and Execution Authority

Carin R. Amaradio, CEO, CCO is responsible for approving the plan, conducting the required annual review and has the authority to execute the Business Continuity Plan. Laurie A. Thompson, COO, CCO also has the authority to execute this Business Continuity Plan.

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. Paper copies will be maintained in the Home Office. An electronic copy of our plan is located in the Home Office on “Server1” (P:) in the Carin folder with a file name of SPM BusinessContinuityPlan2014.docx.

III. Business Description

Our firm offers general investment advisory services for individuals and businesses, developing and recommending an investment strategy tailored to their needs and special circumstances, including pension and retirement plans. We prepare formal financial plans using MoneyGuidePro. We also conduct regular financial reviews and regular reports regarding our client’s accounts.

IV. Office Locations

The following is the firm’s mission critical operational location:

Office Location - The Home Office of Select Portfolio Management, Inc. is located at 26800 Aliso Viejo Parkway, Suite 150, Aliso Viejo, California 92656. Its main telephone number is (949) 975-7900 or toll-free (800) 445-9822. Our home office employees and investment advisor representatives may travel to that office by means of car, motorcycle, bus or by foot.

V. Alternative Physical Location(s) of Employees

In the event of an SBD that affects the West Coast and thus our Home Office operations, Mission Critical Operations staff have also been equipped to operate from their homes by computer if the SBD has only affected the ability to physically go to the offices and not the online capabilities of the firm.

VI. Customers’ Access to Funds and Securities

Our firm does not maintain custody of customer’s funds or securities. Customers are advised to contact investment custodians directly in the case that an SBD affects our ability to assist them.

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

Our firm maintains its primary hard copy books and records and its electronic records at the Home Office – 26800 Aliso Viejo Parkway, Suite 150, Aliso Viejo, California 92656. Carin R. Amaradio, CEO, CCO (949) 975-7900 camaradio@aol.com & Laurie A. Thompson, COO, CCO (949) 975-7900 laurie.thompson@selectportfolio.com are responsible for the maintenance of these books and records. Our firm maintains the following document types: Confidential Client Questionnaires, Confidential Client Data Sheets, Financial Plans, Financial Planning Services Agreements and Correspondence to and from clients.

Our firm maintains its back-up of the financial books and records at – 58540 Van Dyke, Suite 8, Washington, MI 48094. These records are located on the office server in Marlene’s folder using the QuickBooks Accounting Software. Marlene A. Waskiewicz (586) 677-8657 m.wask@selectportfolio.com is responsible for the maintenance and back-up of this information. This financial information is backed up daily and stored by physical tape media which is taken and stored off-site daily.

The Home Office backs up its electronic records daily by physical tape media, which is taken and stored off-site daily at 34475 Via Gomez, Capistrano Beach, CA 92624. The firm also maintains any back up copies of various paper records at 30731 Paseo Elegancia, San Juan Capistrano, CA 92675.

In the event of an internal or external SBD that causes the loss of our electronic or paper records, we will physically recover them from our back-up site(s). If our primary site is inoperable, we will continue operations from our back-up site or an alternate location as detailed above.

VIII. Financial and Operational Assessments

A. 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 – telephone (land lines and cell phones), voice mail, secure e-mail and our web site www.selectportfolio.com In addition, we will retrieve our key activity records (electronic and hard copy) as described in the section above “Data Back-Up and Recovery”.

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

A. Customers

We now communicate with our customers using the telephone, fax, U.S. mail, e-mail and in person visits at our Home Office or at other locations. 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 form (written or oral) 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 e-mail 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.

B. Employees

We now communicate with our employees using the telephone, fax, U.S. mail, e-mail, and in person visits. 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 form (written or oral) 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 and investment advisor representative's office, home and cell phone numbers. The person to initiate the use of the **Call Tree** is: Carin R. Amaradio. She will give instructions to each of the First Level Call Recipients as to the procedures to follow depending on the specifics of the SBD. (ie: "confirm the safety of everyone" or "direct all brokerage clients to call the clearing firm directly for any and all trades"). First level call recipients will then contact those on the **Call Tree** that have been assigned to them to pass on any emergency information and/or confirm the safety of the employee or registered representative. Likewise anyone else who has been assigned a call will carry out that function. First Level Call Recipients will then report back to Carin Amaradio after all contacts have been made. If for any reason someone is not contacted by the person above them on the **Call Tree** the employee or registered representative is instructed to contact Carin R. Amaradio immediately.

Call Tree Initiator	First Level Call Recipients
<i>Carin Amaradio</i>	<i>Laurie Thompson</i>
Office Main: 949-975-7900	<i>Mark Goldsmith</i>
Office Direct: 949-900-8167	<i>Tony Amaradio</i>
Cell: 949-903-0488	<i>Dan Amaradio</i>
Home: 949-248-1155	<i>Gary McCarver</i>

Call Tree - attached

C. Regulators

We are currently registered with the United States Securities and Exchange Commission (“SEC”). We communicate with our regulators using the telephone, fax, U.S. mail, and the Internet. 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 form (written or oral) to the means that we have used in the past to communicate with the other party.

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

A. Business constituents

We have contacted our critical business constituents, and determined the extent to which we can continue our business relationship with them in light of an 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. Our major supplier is our bank: Wells Fargo Bank.

B. Banks

The bank maintaining our operating account is: Wells Fargo Bank 27250 Alicia Parkway, Laguna Niguel, CA 92677 (949) 831-0128. If our bank is unable to provide necessary financing that may result from an SBD, we will seek alternative financing immediately from all possible sources that may be available to us at that time.

XI. Regulatory Reporting

Our firm is subject to regulation by: The Securities Exchange Commission (SEC) and the State of California Department of Corporations. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax and the internet. In the event of an SBD, we will check with the SEC, and the State of California to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) 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.

SEC Headquarters
100 F Street NE
Washington, DC 20549
(202) 942-8088
e-mail: help@sec.gov

SEC-Pacific Regional Office
5670 Wilshire Blvd., 11th Floor
Los Angeles, CA 90036
(323) 965-3998
e-mail: losangeles@sec.gov

California Department of Corporations
1515 K Street, #200
Sacramento, California 95814
(916) 445-7205

XII. Disclosure of Business Continuity Plan

We provide a BCP Disclosure Statement for our clients on our website: www.selectportfolio.com. The statement covers the BCP of Select Portfolio Management, Inc. and its affiliates.

XIII. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location. In addition, our firm will review this BCP annually, to modify it for any changes in our operations, structure, business, or location.

XIV. 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 an SBD.

Signed: _____
Carin R. Amaradio

Title: CEO/CCO

Date: _____