
Burch & Co., Inc.
Business Continuity Plan (BCP)

Emergency Contact Persons

Our firm's two emergency contact persons are A. Randal Burch, 816-309-3844, rburch@burchco.com, and Jessica B. Pastorino, 816-799-5886, jburch@burchco.com. These names will be updated in the event of a material change, and our Executive Representative will review them on an annual basis.

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.

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.

Approval and Execution Authority

A. Randal Burch, a registered principal, is responsible for approving the plan and for conducting the required annual review. A. Randal Burch has the authority to execute this BCP.

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 at Securities Compliance Advisors, with Mr. David McBride, who may be reached at 1-405-577-5030, as well as backed up each night via KC Computer Support (a local Kansas City vendor).

Business Description

Our firm conducts business in direct participation programs, mergers and acquisitions and offers general broker dealer services to issuers of securities. Our firm does not currently have a clearing relationship and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. Purchases are made through subscription agreements, stock purchase agreements or applications which are sent directly to sponsors by each representative or coordinated, in institutional deals, via each parties counsel.

Office Locations

Office Location #1

Our Location #1 Office is located at 4151 N. Mulberry Drive, Suite 235, Kansas City, MO 64116. Our main telephone number is 816-842-4660. Our principals may travel to that office by means of car or public transportation. We maintain the firm's books and records and engage in supervision of firm representatives and Broker Dealer compliance at this location.

Alternative Physical Location(s) of Employees

In the event of an SBD, our principals have the ability of operating remotely from their homes. Our principals' main telephone numbers are Randy Burch – 816-309-3844 and Jessica Burch 816-799-5886.

Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at various third-party issuers. Our firm's clients only have accounts directly with issuers/sponsors who currently maintain all client investment information and communicate with such clients directly. Our firm does not generate investment reports either monthly, quarterly or annual to our clients such is done directly from the issuer to the client. In the event of an internal or external SBD, if telephone service is available, our registered persons can contact issuers on behalf of our clients but such is unlikely since our clients communicate directly with the issuer currently. Through our Web access however we can post information about clients and their sponsors name and telephone numbers if needed. 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. Our firm holds no funds or securities for its clients and is operating under an exemption to the "Customer Protection Rule 15c3-3.

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

Our firm maintains its primary hard copy books and records and its electronic records at 4151 N. Mulberry Drive, Suite 235 Kansas City, MO 64116. A Randal Burch, President, 816-842-4660 is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms: New Account Forms or Investor Record, Issuer Subscription Agreements and Purchaser Questionnaires and Agreements, financial records for the firm, registration and compliance records for both Burch and its Registered Persons, Issuer Selling Agreements and Offering Documents.

Our firm maintains its back-up hard copy and via electronic server, which is backed up nightly. Client related books and records are also stored with various issuers as they are provided with and maintain the documents required for each client investment. The financial records are backed-up on Mr. A. Randal Burch's home laptop computer which is then backed up via external server. The client-related records are maintained hard copy. The financial records are electronic. Mr. A. Randal Burch, President, 816-842-4660 is responsible for the maintenance of these back-up books and records. Our client-related records are backed-up every time subscription agreements or applications are submitted to an issuer in that each issuer maintains all purchase/subscription documents. Financial-related records are backed-up at least quarterly.

In the event of an internal or external SBD that causes the loss of our paper records, we can physically recover them from our back-up sites. If our primary site is inoperable, we will continue operations from our back-up sites 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.

Financial and Operational Assessments

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 Web site at www.burchco.com, our blog at <http://burch.typepad.com>, our telephone voice mail and email. In addition, we can retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

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 owners, independent contractors, bank or other credit sources to fulfill our obligations to our customers and clients. Our firm holds no funds or securities for customers and all investments are paid directly by our customers to sponsors/issuers. If we cannot remedy a capital deficiency, we will

file appropriate notices with our regulators and immediately take appropriate steps as outlined in Burch's Policies and Procedures.

Mission Critical Systems

Our firm does not have the standard "mission critical systems" as we are not involved in the time sensitive processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions or holding of customer funds or securities.

Alternate Communications between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using the telephone, email and U.S. mail. 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

Our home office staff consists of five persons, all of whom are accessible via multiple phone numbers, email and are residents of Kansas City.

C. Regulators

We are currently members of FINRA which is our firm's Designated Examining Authority. We are also licensed with the SEC and all 50 states. We communicate with our regulators using the telephone, facsimile, e-mail, U.S. mail, overnight delivery services, through their various web services such as CRD and Regulatory Form Filing 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 form (written or oral) to the means that we have used in the past to communicate with the other party.

Critical Business Constituents, Banks, and Counter-Parties

Business constituents

We do not have business constituents.

Banks

The bank maintaining our operating account is UMB, 1011 Walnut St., Kansas City, MO 64106; 816-860-4862.

Counter-Parties

We do not have any counter-parties

Regulatory Reporting

Our firm is subject to regulation by the SEC, FINRA and Missouri state securities regulators. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, 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 (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. FINRA District 4 Office, 816-421-5700 – SEC, 202-942-8088 – Missouri Securities Division, 573-751-4136 - FINRAR Washington, 301-590-6500 and SEC Regional Office Chicago, IL, 312-353-7390.

Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at account opening. We mail this statement to customers annually and upon request. Our disclosure statement is attached.

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 or those of our clearing firm.