Item 1: Cover Page

SPC Financial, Inc.

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Website: www.spcfinancial.com

December 21, 2017

This brochure provides information about the qualifications and business practices of SPC Financial, Inc. If you have any questions about the contents of this brochure, please contact us at 301-770-6800 or info@spcfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about SPC Financial, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

SPC FINANCIAL®
Independent Registered Investment Advisor | SEC

December 2017

Item 2: Material Changes

SPC Financial, Inc. has undergone material changes since its last brochure dated May 26, 2017.

The following is a summary of the material changes appearing in this Form ADV: Firm Brochure compared to the last brochure:

This brochure confirms that the quarterly asset-based fee billed in advance by SPC Financial, Inc. ("SPC") does not exceed 2.25% annually. The previous brochure listed ceiling was 3%. *See Item 5: Fees and Compensation.*

Cash balances in an asset-based fee account are included in the account valuation used to establish the quarterly asset-based fee. Previously, cash balances were excluded unless they exceeded 20% of an account's value for three consecutive quarters and then only the cash up to 20% of the account value was included for billing purposes in the third quarter. Clients who expect to hold cash balances in their advisory accounts should consider holding these cash balances in a brokerage account to avoid being assessed an advisory fee. *See Item 5: Fees and Compensation.*

The use of the PASSPORT account was discontinued by SPC. *See Item 5: Fees and Compensation.*

Many mutual funds charge as an operational expense to fund investors what is known as a "12b-1 fee." The fee is charged annually for marketing and distribution expenses, and it is shared with the adviser. The DOL rule considers this to be "conflicted" income. For mutual funds that charge 12b-1 fees and are rolled over into an AMBASSADOR fee-based account, the 12b-1 fees are credited back to the Clients' accounts by Raymond James Financial Services Inc. ("RJFS"). *See Item 5: Fees and Compensation; and Item 12: Mutual Funds.*

Historically, Clients were able to designate cash or securities as non-billable in their AMBASSADOR retirement accounts when Clients intended for those positions to be held for an extended period of time. To conform to the Department of Labor (DOL) fiduciary duty rule, RJFS requires the removal of non-billable positions from retirement accounts by January 1, 2018. Some exceptions for mutual fund share classes may apply. Clients may continue to designate securities or cash in their non-DOL brokerage accounts that they do not wish to be assessed an advisory fee *See Item 5: Fees and Compensation; and Item 12: The Department of Labor Fiduciary Duty Rule.*

The minimum amount required by RJFS for opening an AMBASSADOR account has been reduced from $50,000 to $25,000, although SPC may open AMBASSADOR accounts for Clients with only $5,000 depending upon their facts and circumstances. *See Item 7: Types of Clients*

The Department of Labor delayed full implementation of the fiduciary duty rule until July 1, 2019. The delay postponed the BICE - Best Interest Contract Exemption, which would have restricted retirement accounts from paying brokerage commissions unless a BICE was entered. To stay in front of the DOL rule's final implementation and to avoid the appearance of providing conflicted advice to clients who have retirement brokerage accounts, SPC has been converting some of its Clients' brokerage retirement accounts into Fee-based asset managed accounts. *See Item 12: Best Interest Contract Exemption (BICE).*

You may obtain our Brochure by visiting our web site www.spcfinancial.com or by contacting Daniel A. Ball, Esq. at (301) 770-6800 or by e-mail at dball@spcfinancial.com.

Item 3: Table of Contents

Item 4: Advisory Business

SPC Financial, Inc. ("SPC" or "Adviser") is an Independent Registered Investment Advisor/SEC engaged since 1970 in Financial Planning and Portfolio Management services for individual, corporate, institutional, ERISA funds, and charitable clients. SPC primarily invests in the following types of investments:

- Equity securities (exchange listed, over-the-counter, and foreign issuers)
- Corporate debt securities (other than commercial paper)
- Certificates of deposits
- Municipal securities
- Investment company securities (variable life insurance, variable annuities, and mutual fund shares),
- Exchange Traded Funds
- U.S. government securities
- Options contracts on securities
- Other types of investments including: collectibles, hard assets, life insurance, unit investment trusts, alternative investments and fixed annuities

Advice is tailored to individual Client needs. Client needs are identified by the collection of pertinent information through interviews with the Client and detailed financial planning, as applicable. Clients may be able to impose reasonable restrictions on their accounts. Reasonable restrictions may include the designation of particular securities or types of securities that should not be purchased in their account (i.e., Company XYZ or companies involved in a particular industry, etc.), or should not be sold if held in their account. However, in some cases, since investment discretion has been delegated to SPC or a third-party manager, SPC or the manager may determine that the implementation of such a restriction may be impractical. In the event such a determination is made, the Client will be notified promptly.

A related firm, Sella & Martinic, LLC, offers tax return preparation through a separate engagement letter with clients. Insurance products (life, disability, and long-term care insurance) are offered by SPC's licensed advisors. SPC employs Investment Adviser Representatives ("IARs") and Financial Planners, as well as various professional and administrative staff, some of whom may be registered securities representatives and licensed insurance brokers/agents.

As of September 30, 2017, SPC had the following assets under management. The figures are approximate:

Discretionary:	607,754,570	Accounts	1,685
Non Discretionary	133,432,537	Accounts	1,414
Total Assets	741,187,106	Accounts	3,099

Privacy Policy

SPC is committed to maintaining the confidentiality, integrity and security of personal information entrusted to it by current, past and potential Clients. SPC collects non-public personal information about Clients from the following sources: information received from Clients on applications or other forms and information about Client transactions with SPC, its affiliates or others. SPC restricts access to non-public personal information about Clients to employees who need to know that information to provide products or services to Clients. SPC employees are subject to a strict employment policy regarding confidentiality.

SPC does not disclose, without client permission, any non-public personal information about Clients or former Clients to anyone except as required by law. SPC may disclose information to nonaffiliated parties as required by law, such as government agency or regulators. SPC may use personal information for the purpose of offering or furnishing products and services, including services offered by Sella & Martinic, LLC. Client names and addresses, or other financial information, are never given or sold to unrelated third parties for use except for the below described service.

SPC will provide certain client information to an unaffiliated third party class action clearing firm, Chicago Clearing Corporation ("CCC"). SPC will periodically provide client information to CCC in order that CCC may process class action claims that Clients may hold by virtue of Clients' securities held in Raymond James Financial Services, Inc. accounts. Clients may elect to opt-out of this service by signing a SPC form. Clients, who are residents of California, Vermont, Alaska, Maine, Massachusetts, North Dakota and Louisiana in accordance with those states' privacy policies, will be offered the option to opt-in to SPC's arrangement with CCC since by law they are automatically opted-out.

Item 4: Advisory Business

SPC retains records relating to professional services that it provides to better able assist Clients with professional needs and, in some cases, to comply with professional guidelines. In order to protect Client non-public personal information, SPC maintains physical, electronic and procedural safeguards that comply with professional standards. Under strict confidence, a backup database of SPC Clients and accounts is maintained.

Officers, Investment Adviser Representatives and CERTIFIED FINANCIAL PLANNER™ Professionals

SPC executive officers, IARs and CERTIFIED FINANCIAL PLANNER™ Professionals are noted below, including their education, date of birth, commencement date with SPC, and business background if employed by SPC for fewer than five (5) years.

E. Geoffrey Sella, CPA/PFS, CFP®
CEO and Principal Owner
IAR (1991)
Marquette University, BS
DOB 1958
Raymond James Financial Services
Registered Principal

Daniel A. Ball, Esq.
General Counsel and CCO (2015)
IAR (2017)
Georgetown University Law Center, LL.M., Securities Regulation
Antioch School of Law, JD
University of Texas at Austin, BA
DOB 1956
Ball Law Offices, P.C. (2006-2015)
Selzer, Gurvitch, Rabin & Obecny, Chtd. (2003 - 2006)
Goldberg & Ball f/k/a Lewis, Goldberg & Ball, P.C. (1994 - 2003)
Law Offices of Daniel A. Ball (1988 - 1994)
U.S. Securities & Exchange Commission (1986- 1988)
Lockie & Associates, P.C. (1982-1985)
Raymond James Financial Services
Registered Representative

Leo Martinic, CPA
Treasurer
IAR (2001)
Marquette University, BS
DOB 1958
Raymond James Financial Services
Registered Principal

William Gregory Chatfield, CFP®
Secretary
IAR (1991)
Frederick Community College, AA
DOB 1962
Raymond James Financial Services
Registered Options Principal

Matthew E. Gilchrist, CPA/PFS, CFP®
IAR (2009)
University of Maryland, BA
DOB 1984
Raymond James Financial Services
Registered Representative

Pamela L. Mudd, CPA, CFP®
IAR (2004)
University of Maryland, BS
DOB 1965

Rory M. McGlynn, CFP®
IAR (2012)
College of the Holy Cross, BA
DOB 1987
Raymond James Financial Services
Registered Representative

Jason J. Davis, CIMA®
Financial Analyst
IAR (2012)
University of Maryland, BA
DOB 1987
Raymond James Financial Services
Registered Representative

Philip J. Mantua, Jr., MBA
Financial Planning Associate
IAR(2016)
Eastern University, BA and MBA
DOB 1988
New York Life Insurance (2014-2015)
Raymond James Financial Services
Registered Representative

Elise M. Weinstein, CFP®
Financial Planning Associate
IAR (2017)
Boston University School of Law, JD
University of Pennsylvania, BS
DOB 1967

Charles V. Kimmel, III, CFP®
Financial Planning Dept. Supervisor (2015)
IAR (2009)
University of Maryland University College, BS
DOB 1985
Raymond James Financial Services
Registered Representative

Jason C. Perlman
Financial Planning Associate
IAR (2016)
University of Tennessee, BS
DOB 1991
Raymond James Financial Services
Registered Representative

Kevin P. Iler
Financial Planning Associate
IAR (2016)
Clemson University, BS
DOB 1991
Goodwin Brothers (2014-2015)
Raymond James Financial Services
Registered Representative

Kimberly E. Chidel
Sr. Client Service Associate
IAR (2016)
West Virginia University, BA
DOB 1993
AXA Advisors, LLC (2015-2016)
Raymond James Financial Services
Registered Representative

Item 4: Advisory Business

Professional Designation Glossary

Credential	Accrediting Organization	Requirements
Certified Financial Planner™ (CFP®)	Certified Financial Planner Board of Standards, Inc.	A financial planner who has completed study and passed examinations in risk management, investments, tax planning, retirement planning, and estate planning. Must have a minimum level of three years experience, continue to update knowledge in the field, and adhere to prescribed code of ethics. Continuing Education/Experience Requirements: 30 hours every 2 years
Certified Public Accountant (CPA)	State Boards of Accountancy for CPA licenses American Institute of Certified Public Accountants (AICPA)	To attain the right to use the Certified Public Accountant designation (CPA), an individual must satisfactorily complete the following: • Education – College education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting) • Experience – Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA) • Examination – Successful passage of the Uniform CPA Examination • Continuing Education – Successful completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period) • Ethics – All members must adhere to the AICPA's Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interests (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services **Information on requirements: American Institute of Certified Public Accountants*
Personal Financial Specialist (PFS)	American Institute of Certified Public Accountants (AICPA)	To attain the right to use the Personal Financial Specialist (PFS), one must successfully meet the following requirements: • Education – Candidate must complete the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. The individual must hold a CPA license. In addition, they must fulfill 75 hours of personal financial planning CPE credits. • Experience – Candidates must fulfill 3,000 hours of personal financial planning business experience • Examination – Candidates must successfully pass a comprehensive financial planning exam • Continuing Education – Must fulfill 60 hours of financial planning CPE credit every three years. • Ethics – PFS is required to adhere to the AICPA's Code of Professional Conduct, and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning practice. • Membership – Candidates must also be an active member of the AICPA. **Information on requirements: American Institute of Certified Public Accountants*
Certified Investment Management Analyst (CIMA®)	Investments & Wealth Institute™, *formerly* Investment Management Consultants Association® (IMCA®)	Those who have earned the CIMA® certification must meet the eligibility requirements, including the "four E's": experience, education, examination, and ethics. • Have at least three years of work experiences in the financial services industry • Pass a background check • Study for and pass a Qualification Examination • Completion of an executive education classroom program, either in-person or online, at a top 20 business school registered with the IMCA® • Study for and pass a comprehensive Certification Examination • Have a satisfactory record of ethical conduct as determined by the IMCA® Admissions Committee • Agree to abide by the IMCA® Ethics standards and sign a license agreement • Every two years following initial certification, members must complete and report a minimum of 40 hours of continuing education credit, including two ethics hours.

Item 5: Fees and Compensation

INVESTMENT ADVISORY SERVICES FEES

Financial Planning

SPC contracts with Clients to provide investment advisory services including the development of a strategy and investment plan based upon the Client's individual goals and needs. SPC also offers Clients all the services listed on the Investment Advisory Agreement ("Financial Planning"). Each Client is assigned one or two Investment Adviser Representatives ("IAR") who will oversee the implementation and maintenance of the Client's plan. A Financial Plan may include 1) a review, analysis and advice on the Client's assets, including assets not held with SPC's affiliated broker/dealer (see Portfolio Management), 2) retirement planning, 3) survivor needs analysis, 4) income, estate and gift tax planning, 5) education funding, and 6) life, disability, and long term care insurance planning. In preparing a Financial Plan for a Client, the IAR gathers information deemed relevant to the particular service provided through personal interviews with the Client and through documents and/or Client profile questionnaires completed by the Client. Each service includes an analysis of the Client's financial information, which may, but is not necessarily required to include items such as: their current assets, income, investments, liabilities, short and long-term capital and liquidity needs, risk tolerance and short and long-term financial goals and objectives. IARs may also help the Client coordinate the implementation of any recommendations made, including referrals to other practicing professionals such as an attorney, accountant or insurance agent whose services may be required.

SPC and the Client agree in advance to the scope of Financial Planning services and the fee associated with the services.

Basic Fee Schedule
SPC may charge an hourly rate of up to $400 per hour agreed in advance of service or a flat fee for the initial creation/implementation of a Financial Plan. The fee is billed upon completion of services. The minimum fee generally is $400 for a Financial Plan unless reduced or waived by SPC in its discretion.

Refund Policy/Termination Procedure (Basic Fee Schedule)
If the fee is paid in advance of services, the Client may request a refund within five (5) days of payment by termination either verbally or in writing. A Client that terminates the advisory agreement within the first five (5) business days of entering into the initial advisory agreement will have all advisory fees incurred refunded. The Client has no further obligation to SPC upon the return of the fee and SPC has no further obligation to the Client. If the Client retains SPC for initial financial planning services only in accordance with the basic fee schedule, the financial advisory relationship will be terminated upon SPC's rendering of the services and receipt of the Client's payment.

Annual Fee Schedule
The annual fee range may be $350 - $2,000 as agreed in advance by SPC and the Client.

Refund Policy/Termination Procedure (Annual Fee Schedule)
If the fee is paid in advance of services, the Client may request a refund within five (5) days of payment by termination either verbally or in writing. A Client that terminates the advisory agreement within the first five (5) business days of entering into the initial advisory agreement will have all advisory fees paid refunded.

Client Agreement/Assignment
The Financial Planning fee paid by the Client to SPC is based upon an Investment Advisory Agreement, (individually/collectively with the below referenced affiliated Broker Dealer Agreement(s), the "Client Agreement"). SPC will not assign a Client Agreement without the Client's consent.

Portfolio Management

SPC contracts with Clients to provide investment advisory services including periodic review and recommendations of securities portfolio(s) held in a Client's affiliated Broker Dealer account(s) ("Portfolio Management"). SPC's affiliated Broker Dealer is Raymond James Financial Services, Inc., member FINRA/SIPC, and Raymond James & Associates, member NYSE/SIPC ("Raymond James", "RJFS", and/or "RJA"). Clients execute a Broker Dealer Agreement for each securities account held at Raymond James. Raymond James provides to SPC, among other services, custody of Client accounts and clearing of Client securities transactions. Please refer to Item 10, "Other Financial Industry Activities and Affiliations," for more complete information. **Investment advisory services are offered through SPC. SPC is not a registered broker/dealer and is independent of Raymond James.**

Item 5: Fees and Compensation

Fee Schedule
SPC and its IARs receive compensation for Portfolio Management as described below. Portfolio Management fees are separate from and in addition to Financial Planning fees.

Broker Dealer Agreement / Annual Asset-Based Fee
For Portfolio Management investment advisory services, SPC may charge the Clients a fee, billed quarterly, not to exceed two and one-quarter percent (2.25%) annually of the asset value of the Clients' affiliated Broker Dealer securities account(s) ("Asset-based Fee"). The Asset-based Fee and accounts are specified in writing in the Broker Dealer Agreement(s), the SPC Investment Advisory Agreement, or both. A portion of the Asset-based Fee is paid to RJFS for administrative services. When a Portfolio Management account is opened, the Asset-based Fee is billed for the remainder of the current quarterly billing period and is based on the initial contribution. Thereafter, the Asset-based Fee is billed quarterly in advance, based upon the account asset value on the last business day of the previous calendar quarter, and becomes due the following business day. The brokerage statements issued by RJFS will show the amount of the Asset-based fee.

Payment of the Asset-based Fee in advance may cause the actual percentage amount charged to the Client during any quarter to be more or less than the stated percentage due to fluctuations in the Client's account(s) value during the quarter, deposits made during the quarter, and withdrawals made during the quarter.

Clients authorize and direct Raymond James as Custodian to deduct Asset-based Fees from their account(s) at the beginning of each quarter. Clients authorize and direct Raymond James to pay SPC. RJFS/RJA provide various administrative services to Clients which include determining the fair market value of assets held in their accounts, account transactions, receipt and disbursement of funds including fees paid to SPC, interest and dividends received, and account gain or loss by security, as well as for the total account.

The U.S. Department of Labor (DOL) introduced a new rule governing retirement accounts (commonly referred to as the "Fiduciary Rule"). To comply with the rule, Raymond James revised how Asset-based advisory fees are assessed on retirement accounts and other investment accounts. Previously, Raymond James and SPC did not charge an Asset-based Fee on cash balances if they exceeded 20% of the Account Value for three consecutive quarters. The 20% exclusion has been eliminated; therefore, cash balances are included in the Account Value and the Asset-based Fee is applied to cash balances in retirement and other investment accounts. Raymond James sent written notices to SPC clients in May 2017 informing them that the billing practices would change as of June 2017. Clients that expect to hold cash balances in their advisory accounts should understand that advisory fees will be assessed on the total Account Value even if cash balances exceed 20%. As an alternative, clients may hold these cash balances in a brokerage account to avoid being assessed an advisory fee.

In non-DOL impacted retirement accounts, certain securities may be held in a Client's AMBASSADOR account and designated as "Administrative-Only Investments." SPC and the Client may designate certain investments as Administrative-Only Investments in order to temporarily waive the advisory fee over those assets. This arrangement between SPC and the Client may be for a security that the Client wishes to hold for an extended period of time and does not wish for SPC to sell in the foreseeable future. Raymond James may designate certain securities as Administrative-Only Investments if it determines that they are not eligible for the advisory fee (such as mutual funds purchased with a front-end sales charge through Raymond James within the last two years, new issues and syndicate offerings).

PLEASE NOTE: Due to DOL regulations, the designation of Client-designated Administrative-Only Investments and the maintenance of such positions in the Client's account are not permissible in DOL impacted retirement accounts (such as IRAs and employer sponsored retirement plans). The underlying premise of this prohibition is that the maintenance of assets in an advisory account that are not being assessed an advisory fee introduces a potential conflict that the financial advisor's advice may be biased as a result of their not being compensated on this asset. As a result, the financial advisor may recommend a course of action in their and not the client's interest (such as selling the security to increase the financial advisor's compensation). Raymond James has elected to preserve the ability for clients and their financial advisors to designate assets as Client-designated Administrative-Only in their non-DOL impacted accounts in order to maintain client choice and avoid the need to maintain a separate account to hold these securities or cash. Nevertheless, while Raymond James cannot accommodate this level of flexibility in DOL-impacted retirement accounts, Clients can choose to maintain securities or cash in their brokerage account that they do not wish to be assessed an advisory fee.

Item 5: Fees and Compensation

The Annual Asset-based fees include all execution charges except (1) certain dealer-markups and odd lot differentials, transfer taxes, exchange fees mandated by the Securities Exchange Act of 1934, as amended, and any other charges or taxes imposed by law for transactions in the account; and (2) offering concessions and related fees for public offerings of securities as described in the prospectus.

RJFS facilitates the maintenance of custody of Client securities positions through RJA at no additional charge, including holding securities in nominee name.

Termination Procedure (Annual Asset-Based Fee)
Either party may terminate the Investment Advisory Agreement, as it relates to the Annual Asset-based Fee, upon written notification to the other party. If the Agreement is terminated before completion of services, any unearned fees paid by the Client will be refunded back to the Client. Termination of SPC and the Investment Advisory Agreement does not automatically terminate SPC or its IARs as the financial advisor or agent of record on any Client Broker Dealer securities accounts, direct mutual fund and variable annuity accounts, or insurance contracts.

Client Agreement/Assignment
The Asset-based Fee paid by the Client to SPC is based upon the Client Agreement. SPC will not assign a Client Agreement without the Client's consent.

Accounts
For Portfolio Management, SPC utilizes the RJFS AMBASSADOR account described below. Asset-based Fees the Clients pay for investment advice and services are based upon the value of assets in their account(s), independent of the level of trading activity. By deciding to pay a fee based on asset values rather than commissions on transactions, a Client's fee may be higher than the cost of a commission alternative during periods of lower trading activity.

The Asset-based Fee charged is in addition to the management fees and operating expenses charged by open-end and closed-end mutual funds and by exchange traded funds (ETFs). To the extent that a Client intends to hold shares for an extended period of time, these internal fund expenses should be added to the Asset-based Fees when evaluating the costs of a fee-based account. In addition, certain mutual fund families impose short-term trading charges (typically 1% to 2% of the original amount invested) which are generally NOT waived for fee-based accounts. These short-term charges are imposed by the funds (not SPC, RJFS or RJA) to deter "market timers" who trade actively in fund shares. Clients should consider these short-term trading charges when selecting the account and/or mutual funds in which they invest. These charges, as well as operating expenses and management fees, which may increase the overall cost to the Client are disclosed in each fund's prospectus.

Certain no-load variable annuities may be offered in AMBASSADOR accounts and may be subject to the Asset-based Fee, which is in addition to the mortality and expense charges, management fees and operating expenses charged by the insurance companies offering these products. More sophisticated investments such as options and margin may be offered in AMBASSADOR accounts. Fees for advice and execution on these securities are based on the total asset value of the account. While a negative amount may show on a Client's statement for the margined security as the result of a lower net market value, the amount of the fee is based on the absolute market value. This could create a conflict of interest where an IAR may have an incentive to encourage the use of margin to create a higher market value and therefore receive a higher fee. The use of margin may result in interest charges in addition to all other fees and expenses associated with the security involved. The use of margin also increases the risk of loss to Client portfolios.

A Client's total cost of each of the services provided through these accounts, if purchased separately, could be more or less than the costs of each respective service. Cost factors may affect the Client's ability to:

1) obtain the services provided within the accounts separately with respect to the selection of mutual funds,

2) invest and rebalance the selected mutual funds without the payment of a sales charge, and

3) obtain performance reporting comparable to those provided within each account.

When making cost comparisons, Clients should be aware that the combination of multiple mutual fund investments, advisory services, custodial and brokerage services available through each account may not be available separately or may require multiple accounts, documentation and fees. If an account is actively traded or the Client does not qualify for reduced sales charges for fund purchases, the fees may be less expensive than separately paying the sales charges and advisory fees. If an account is not actively traded or the Client otherwise would qualify for reduced sales charges, the fees in these programs may be more expensive than if utilized separately.

Item 5: Fees and Compensation

Investments which are included in the asset value of the Client's Asset-based Fee account(s) for purpose of calculating the Asset-based Fee compensation to SPC are hereinafter referred to as "Fee Investments." These investments include open-end mutual funds offered with no sales commission or load, publicly traded closed-end mutual funds, ETFs, common and preferred stocks, American Depository Receipts, options contracts, real estate investment trusts, corporate bonds, U.S. Government and Government agency bonds, mortgage backed securities and municipal bonds, cash and money market investments, and any other investment that may, from time to time, be designated as a Fee Investment. For the purposes of the Client Agreement, the term "value of the account" shall mean the total absolute value of the securities in the account, long or short, plus all credit balances, with no offset for any margin or debit balances.

Mutual funds which charge a Client 12b-1 fees to compensate securities professionals for selling the fund, which funds are rolled over into an AMBASSADOR account, are credited to the Client by RJFS (if applicable). The AMBASSADOR account restricts the purchase of mutual fund shares with a sales load.

Other investments may be bought or sold by Clients in their Asset-based Fee accounts but will be defined as "Fee Exempt Investments." Fee Exempt Investments generally include new or secondary securities offerings, including brokered certificates of deposit. Should a Client buy any of these securities, Client will pay, directly or indirectly, a commission which is defined by the terms of the offering as stated in the prospectus or confirmation for the security. Unless otherwise agreed to by the Client and RJFS, said investments will be exempt from inclusion in the asset value of the Client's account subject to the Asset-based Fee for a period of twelve (12) months from the date of purchase in the Client's account. After a twelve (12) month period from the date of purchase, the applicable Fee Exempt investments will revert to Fee Investments.

Retirement accounts, employer sponsored retirement plans such as defined benefit pension plans, Keogh, 401(k), Roth 401(k), 403(b), 457, SIMPLE SEP, and individual retirement accounts such as traditional IRA and Roth IRA plans are protected by the Department of Labor ("DOL") rule. Historically, Clients had been able to designate cash or securities as non-billable in their AMBASSADOR **retirement** accounts, but RJFS changed that practice to conform to the DOL rule interpretations. For new AMBASSADOR **retirement** accounts, as of June 1, 2017, the choice to designate cash or securities as non-billable was removed. Financial advisors and clients have until January 1, 2018 to remove existing non-billable positions from existing retirement accounts. Certain exceptions for non-billable positions to remain in AMBASSADOR **retirement** accounts are available for Class A Share fee-eligible mutual funds as well as Class C Shares that are exchanged into an advisory fee eligible share class as described in this section. Existing Primary Market Distributions and Structured Products may also remain in AMBASSADOR **retirement** accounts and will continue to be not included in the billable value of the account for fee calculation purposes for four (4) quarters following their purchase. These assets will automatically become fee-eligible at the quarterly billing following the one year purchase date.

If cash or securities, or a combination thereof, amounting to at least $100,000 are deposited to or withdrawn from an account on an individual business day in the first two months of the quarter, Raymond James will: (i) assess asset-based fees to the deposited assets based on the value of the assets on the date of deposit, or (ii) refund prepaid asset-based fees based on the value of the assets on the date of withdrawal. No additional asset-based fees or adjustments to previously assessed asset-based fees will be made in connection with deposits or withdrawals that occur during the last month of the quarter unless requested by the client. Notwithstanding the above, Raymond James reserves the right, in its sole discretion, to process or not process fee adjustments, as applicable, when the source and destination of deposits and withdrawals involve a client's other fee-based advisory accounts. In addition, Raymond James may, in its sole discretion, take any action it considers fair and reasonable with respect to the application of fee adjustments based upon its review of the timing and amounts of deposits to and withdrawals from a client's account.

The fee schedules for the various types of accounts are as follows:

AMBASSADOR FEE SCHEDULE

Account Value*	Annual Asset-based Fee**
Up to $1 million	2.25%
$1 million up to $2 million	2.00%
$2 million up to $5 million	1.75%
$5 million up to $10 million	1.50%
$10 million and up	1.25%

**The minimum Account value is $25,000.* ***This fee schedule is retroactively applied to the first dollar as each breakpoint is met.*

Item 5: Fees and Compensation

Aggregating Related Accounts For Fees

The aggregate value of related Raymond James fee-based accounts will be used to determine the applicable standard advisory rate applied to each account. "Related accounts" are accounts of an individual, his or her spouse, and their children under the age of 21. This includes individually owned accounts, individual IRAs, self-directed accounts (i.e., directed by individual participants) under an employee-benefit pension plan (ERISA plan), and ERISA plans in which an individual is the sole participant. Aggregating accounts will decrease the overall client fee by allowing clients to attain higher asset breakpoints where the scheduled rate is lower. Furthermore, accounts of the same corporation or business entity are normally deemed as related. For example, if ABC Manufacturing has both a profit sharing plan and a pension plan (non-directed), these two accounts will be considered related. However, corporate accounts such as corporate cash would not be related to such retirement plan accounts. Also, charitable trusts are not included in the aggregation.

FREEDOM Account

Freedom is an investment advisory account managed by RJA. SPC does not exercise discretionary authority over a Client's Freedom account(s), but retains oversight responsibility. Raymond James allocates assets in Freedom accounts through discretionary mutual fund management, based upon a Client's financial objectives and risk tolerances.

Account Value*	Annual Asset-based Fee**
Up to $1 million	2.25%
$1 million up to $2 million	2.00%
$2 million up to $5 million	1.75%
$5 million up to $10 million	1.50%
$10 million and up	1.25%
**The minimum Account value is $50,000.*	***This fee schedule is retroactively applied to the first dollar as each breakpoint is met.*

Accounts – Additional Disclosures

SPC IARs are also registered representatives of Raymond James Financial Services, Inc., member FINRA/SIPC, and must recommend Raymond James to all advisory clients for brokerage services. IARs are subject to FINRA Conduct Rule 3040 that restricts them from conducting securities transactions away from Raymond James. Therefore, Clients are advised that IARs are limited to conducting securities transactions only through Raymond James. It may be the case that Raymond James charges a higher fee than another broker charges for a particular type of service, such as transaction fees. Clients may utilize the broker/dealer of their choice and have no obligation to effect transactions through Raymond James. However, if a Client does not utilize Raymond James as their broker/dealer, SPC will not be able to accept the Client's account(s), place securities trades for the client or perform any Portfolio Management investment advisory services for the Client.

IARs may receive other forms of compensation as a part of business activities unrelated to the Adviser. These activities may create a conflict for the IAR. However, SPC has policies and procedures in place to recognize and appropriately deal with any conflicts that arise amidst the IAR's multiple roles. These activities are discussed in *Item 10*.

Raymond James calculates quarterly fees based on the actual number of days in the billing period. This policy applies to individual additions and withdrawals made during the first two months of the quarter. Fees will be calculated based on the day they occur and will not be aggregated across multiple days. Fees will be based on the previous quarter-end Relationship Value – that is, the Relationship Value will not be adjusted to account for intra-quarter additions or withdrawals.

Item 6: Performance-Based Fees and Side-By-Side Management

SPC does not have performance-based fees or utilize side-by-side management. Performance-based fee arrangements involve the payment of fees based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Item 7: Types of Clients

SPC has the following types of clients:

- Individuals
- Trusts
- Estates
- Charitable Organizations
- Corporations
- Pension and Profit Sharing Plans

SPC does not require a minimum asset amount for financial planning or hourly consulting. RJFS has a minimum investment of $25,000 for an AMBASSADOR account and $50,000 for a Freedom account, although smaller accounts may be accepted and SPC may open AMBASSADOR accounts for clients with only $5,000 based upon the specific circumstances of an account or client.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

The investment programs and strategies recommended to clients are based upon the client's investment objectives, financial situation and needs, and tolerance for risk, as identified during consultations with our financial advisors and other representatives. It is important for an investor to review investment objectives, risk tolerance, time horizon, tax objectives and liquidity needs with their financial advisor prior to selecting an investment product, program or strategy. All investments carry a certain degree of risk and no one particular security, investment product, investment style or portfolio manager is suitable for all types of investors.

SPC and its financial advisors recommend and offer a broad spectrum of investment products, programs and strategies. Given the number of financial advisors providing advice at SPC, the methods of analysis and investment strategies recommended will vary based upon the individual financial advisor making the Client assessment and providing the advice.

METHODS OF ANALYSIS

SPC and its financial advisors may employ one or more of the following methods of investment analysis:

Fundamental Analysis: involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Technical Analysis: involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

Cyclical Analysis: a type of technical analysis that involves evaluating recurring price patterns and trends. The risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day to day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

SPC obtains research from several sources including Raymond James research, financial publications, research materials prepared by others, corporate rating services, annual reports, prospectuses and filings with the Securities and Exchange Commission.

INVESTMENT STRATEGIES

SPC provides numerous investment management styles and strategies, including large and small cap equity, international equity, fixed income, and a broad spectrum of mutual funds and exchange traded funds, either individually or in combination within a portfolio. Generally, SPC recommends a long term approach to investing and provides clients a diversified investment strategy incorporating domestic and international equities, fixed income, and other asset classes such as real estate, and commodities. However, sell stop or portfolio hedging strategies may be utilized to limit downside risk, which may result in short term holding periods. SPC also may employ shorter term strategies as economic conditions warrant or for tax benefits. SPC strives to build assets over time with sound investments. Investment strategies are structured only after careful analysis of a Client's overall financial situation, risk tolerance, and investment objectives. As economic conditions change, recommendations and investment philosophy may change accordingly to maximize benefits and minimize risk to Client portfolios.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

SPC IARs may utilize margin and option trading for Clients based upon a Client's financial situation, risk tolerance, and investment objectives. All margin and option accounts must be approved by RJFS Compliance and consented to in writing by the Client. The exact composition of recommended programs and investment strategies will be determined by the Client's legal and tax considerations and greatly influenced by the Client's liquidity needs and tolerance for risk (fluctuations in portfolio values).

SPC also provides investment advice based on asset allocation strategies through the Eagle, Freedom, Freedom UMA, and RJFS managed account programs offered through Raymond James. Unaffiliated asset allocation products may also be available through SPC. Unless specifically noted, tax efficiency is not a primary consideration in the management of accounts offered by Raymond James through the programs named above.

SPC, through its financial advisors, may offer advice on collectibles, hard assets, fixed insurance, unit investment trusts, and business valuation and succession planning. Raymond James, through its advisors, may also offer non-publicly traded products, including non-listed real estate investment trusts, limited partnerships, hedge funds, equity funds and other structured products.

PRINCIPAL RISKS

Investing in securities involves risk of loss that you should be prepared to bear. All investment programs have certain risks that are borne by the investor. Investors face the following investment risks:

Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

Business Risk: Business risk refers to the possibility that the issuer of a stock or a bond may experience a substantial decline in revenues, or may go bankrupt or be unable to pay interest or principal in the case of bonds.

Item 9: Disciplinary Information

There are no legal, disciplinary or administrative events affecting SPC, its management or its IARs.

Item 10: Other Financial Industry Activities and Affiliations

SECURITIES BROKERAGE

IARs or related persons, in their individual capacity as Registered Representatives of Raymond James Financial Services, Inc., are paid fees and/or commissions on securities transactions. All commissions are disclosed to the Clients. All commissions received are assigned by the IARs or related persons to SPC or its designee, except the portion paid to the IARs or related persons, if applicable. Notwithstanding the fact that the IARs or related persons of SPC are Registered Representatives of RJFS, SPC is solely responsible for all investment advice rendered to Clients.

Item 10: Other Financial Industry Activities and Affiliations

SPC also offers through its broker-dealer affiliation the services of Raymond James & Associates, Inc. ("RJA"), a New York Stock Exchange member firm. RJA executes securities transactions for RJFS. Transactions and compensation are governed by SEC regulations regarding disclosure requirements. SPC also offers, through its broker-dealer affiliation, the portfolio management services of Raymond James Consulting Services and Asset Management Services (AMS). AMS is an operating division of Raymond James. SPC also offers, through its broker-dealer affiliation, public and private limited partnerships and Real Estate Investment Trusts.

Commission charges may vary depending upon any number of factors, including type of security, purchase or sale, secondary market price, volume of trading, market float, and traded or listed exchange. SPC believes that commissions charged by RJFS are competitive with other full service broker-dealers and, while generally fair and reasonable, are not the lowest in the industry.

Client accounts which are charged a Portfolio Management fee (Asset-based Fee accounts) are not charged commissions and transaction fees. However, clients who execute brokerage transactions through RJFS may be charged commissions and transaction fees in addition to the Portfolio Management fee charged by SPC. Brokerage transactions are placed only through RJFS. There is an inherent potential conflict of interest in this arrangement in that SPC through its IARs or related persons who are Registered Representatives of RJFS may share in a percentage of the brokerage commissions; however, commission charges paid by Clients are not higher as a result.

IARs and related persons may recommend Raymond James Consulting Services, an account platform offered by RJA, or Asset Management Services, a division of Raymond James & Associates, Inc. Raymond James Consulting Services and/or Asset Management Services retain outside portfolio managers who are Registered Investment Advisers. Asset Management Services also sponsors Eagle Asset Management, a Registered Investment Adviser. IARs or related persons may recommend to Clients any of these affiliated firms and receive fees and/or commissions. Commissions and/or fees received by IARs or related persons are assigned to SPC or its designee, except the portion paid to related persons, if applicable. Quarterly fees to Eagle and other portfolio managers under Raymond James Consulting Services and/or Asset Management Services are automatically deducted from Client accounts and detailed on RJA statements. The statement includes line items showing the value of the Client's assets upon which the fee is based and the specific manner in which the fee is calculated. It is the Client's responsibility to review these statement entries for accuracy and to notify SPC of any discrepancies.

INSURANCE BROKER/AGENT

SPC and its IARs or related persons have insurance company affiliations, individually, from which they receive commissions. Insurance products (life, disability, and long-term care insurance) are offered by SPC's licensed advisors. Clients are under no obligation to execute recommendations relating to insurance and/or annuity products through SPC's IARs. Variable insurance products are placed through Raymond James Insurance Group, an affiliate of RJFS.

TAX PREPARATION

SPC IARs or related persons offer tax preparation services through the related firm Sella & Martinic, LLC through a separate engagement letter with clients. Sella & Martinic, LLC charges separate fees for preparation and/or amending of Client income tax returns based upon the complexity of the return and the time involved by the preparer. Fees for income tax preparation are payable by the client upon completion of the return. Sella & Martinic, LLC provides additional accounting services but does not provide any attest services (such as audits, reviews and compilations). Edward Geoffrey Sella, Leo Martinic, Pamela Mudd, William Gregory Chatfield, Matthew Gilchrist, Rory McGlynn and Elise Weinstein receive compensation from Sella & Martinic, LLC. Some Financial Planning Associates and support staff of SPC provide assistance to Sella & Martinic, LLC, often during tax season, and they receive compensation from Sella & Martinic, LLC for their services. In addition, Sella & Martinic, LLC is a sub-tenant of SPC Financial, Inc. As such, Sella & Martinic, LLC pays rent to and shares in common expenses with SPC. **Sella & Martinic, LLC is not a registered broker/dealer and is independent of RJFS.**

OTHER ACTIVITIES

SPC IARs and related persons may participate in events or accept speaking engagements regarding various financial topics unrelated to investment services or securities products. SPC IARs or related persons may render general tax and financial advice to Clients when providing financial planning services.

For more information regarding other financial industry activities and affiliations by a specific IAR, please consult the *Brochure Supplement* for the respective individual.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

SPC IARs or related persons may buy or sell securities that are also recommended to Clients. All conflicts of interest are disclosed to the Client. SPC has adopted specific policies to prevent its IARs and related persons from trading ahead of Client orders, from receiving better pricing than Clients when trading in the same securities at the same time, from the misuse of material, non-public information to trade in securities, and from the misuse of any Client information to trade in securities. SPC also prohibits without pre-approval from its Chief Compliance Officer, purchase by its IARs or related persons of any Initial Public Offering or privately issued securities, to prevent misappropriation of an investment opportunity from Clients. SPC strictly monitors IARs and related persons' securities accounts, and employs additional specific procedures and reviews to enforce these policies. SPC policies and procedures governing participation of interest in Client transactions are contained in SPC's Code of Ethics, a copy of which will be furnished to Clients or prospective Clients upon request.

A potential conflict may exist as a result of the compensation associated with the AMBASSADOR account because RJFS and SPC may have a financial incentive to recommend a fee-based program rather than recommending that the Client pay for investment advisory services, brokerage, and other services separately. This potential conflict could extend to the various share classes of mutual funds available and the fees assessed by the funds. AMBASSADOR is an advisory account, and SPC is being paid for its knowledge, judgment and advice; therefore. SPC is not required to recommend the lowest cost alternative to Clients. However, as a fiduciary, SPC considers whether the fee which Clients are paying is appropriate based on the services provided. In addition, in retirement accounts, if lower cost mutual fund shares are available, SPC will recommend them for new purchases.

SPC, its IARs, and related persons have a duty to exercise authority and responsibility for the benefit of the Client, to place the interests of the Client first, and to refrain from having outside interests that conflict with the interests of the Client. All SPC IARs and related persons must avoid any circumstances that might adversely affect, or appear to affect, the duty of complete loyalty to the Client. All SPC IARs and related persons must adhere to SPC's Code of Ethics.

Item 12: Brokerage Practices

The Advisor currently uses RJA as its Custodian. Clients may use a Custodian of their choice and have no obligation to utilize RJA/RJFS. However, the Advisor cannot accept the account if the Client chooses another Custodian. The Custodian may have their own fee and cost schedules; they are entitled to as a Custodian of the account. These fees and costs are completely independent of the Adviser, and the Adviser does not receive any portion of these collected fees.

Clients who maintain brokerage accounts with RJFS which are not Fee-based accounts pay commissions on securities trades. The amount of the commissions will vary depending upon the type of security, the exchange or market where traded, the number of shares traded, the price, and other factors. RJFS sets the commission rate. For mutual funds, RJFS charges transaction fees of $15 on load funds and $40 on no-load funds if the funds are not "Partner Funds" (mutual fund companies which have agreed to pay marketing services and support fees to Raymond James). These mutual fund fees do not apply to DOL impacted retirement accounts. RJFS charges an annual account maintenance fee of $50 for client relationships up to $100,000, but waives the fee if the relationship is $100,000 or more. Clients also may incur RJFS service fees for issuing certified or cashier's checks, outgoing wire transfers, returned deposit items, extensions for payment of securities received after the settlement date, overnight or Saturday check disbursements, transferring an account outside of RJFS, and on small stock transactions which are $300 or less. RJFS may waive any of these fees for client relationships valued at $500,000 or more.

Investment of Cash Reserves

Raymond James has established a system in which cash reserves "sweep" daily to and from the Client's investment account to cover purchases or to allow excess cash balances to immediately begin earning interest, subject to certain minimum balances. The account in which these cash reserves are held is considered the Client's sweep account. Available sweep options include the Raymond James Bank Deposit Program ("RJBDP"), the Client Interest Program ("CIP") sponsored by Raymond James, and a proprietary class of money market funds (the "Eagle Class - JP Morgan Money Market Funds") of the JP Morgan Prime Money Market Fund and JP Morgan Tax Free Money Market Fund, managed by J.P. Morgan Investment Management, Inc. ("J.P. Morgan") and offered by Eagle. Clients may select RJBDP, CIP, the Eagle Class - JP Morgan Money Market Funds, or any combination thereof.

Item 12: Brokerage Practices

With respect to cash reserves of advisory Client accounts, the custodian of the account assets will determine where cash reserves are held. The custodian may offer one or multiple options to different account types (such as non-taxable and managed accounts). In addition, the custodian may, among other things, consider terms and conditions, risks and features, conflicts of interest, current interest rates, the manner by which future interest rates will be determined, and the nature and extent of insurance coverage (such as deposit protection from the Federal Deposit Insurance Corporation ("FDIC") and Securities Investor Protection Corporation ("SIPC"). The custodian may change an investment option at any time by providing the Client with thirty (30) days advance written notice of such change, modification or amendment.

Due to the foregoing practices, RJA may obtain federal funds prior to the date that deposits are credited to Client accounts and thus may realize some benefit because of the delay in investing such funds.

For further information please refer to the Cash Sweep Options disclosure statement, a copy of which is available from your IAR, or is available on the Raymond James public website, www.raymondjames.com.

Note: SPC assesses advisory fees on cash sweep balances held in advisory accounts.

Billing cash balances, particularly when the cash balance is maintained for an extended period of time or comprises a significant portion of the Account Value, may create a financial incentive for a financial advisor to recommend maintenance of this cash versus Investing in an otherwise advisory fee-eligible security. For example, it is generally expected that the advisory fee will be higher than the interest a client will earn on this cash balance through their sweep account, so the client should expect to achieve a negative return on this portion of their account, although such cash balances will not be subject to market risk (that is, risk of loss) associated with securities investments. As a result, clients should periodically re-evaluate whether their maintenance of a cash balance is appropriate in light of their financial situation and investment goals, and should understand that this cash may be held outside of their advisory account and not subject to advisory fees.

Custodial, Research and Trading Practices

RJA, as the Custodian, is obligated to seek best execution for all trades; however, better executions may be available via another broker/dealer based on a number of factors including volume, order flow, and market making activity. By executing transactions with the above Custodian, it is not guaranteed that a client will receive the most favorable execution of their trades, which in turn may cost clients more money.

SPC selected RJFS for Client account custody and trade processing due to accessibility, electronic trading, efficient and professional service, technical support, and timely reporting to Clients. In addition, Client funds are covered through the excess SIPC coverage maintained by RJFS. RJFS prohibits SPC from utilizing any other broker-dealer for Client custody or securities trading.

SPC IARs and related persons may receive research information through its broker-dealer affiliation on securities, market, and economic conditions. Raymond James does not impose surcharges on Clients for research. However, Raymond James does seek to do investment banking and other business with some companies covered by its research. Raymond James complies with all securities laws and regulations to manage these potential conflicts of interest. Additionally, Raymond James does not require that SPC IARs or related persons recommend any securities to Clients.

The Advisor may aggregate sale and purchase orders of securities held by the Advisor's Clients with similar orders being made simultaneously for other Clients if such aggregation is reasonably likely to result in overall economic benefit to Clients based on an evaluation that the Clients are benefited by relatively better purchase or sale prices, lower commission expenses or beneficial timing of transactions, or a combination of these and other factors. In some instances, the purchase or sale of securities for Clients will be effected simultaneously with the purchase or sale of like securities for other Clients. Such transactions may be made at slightly different prices, due to the volume of securities purchased or sold. In such event, the average price of all securities purchased or sold in such transactions is determined and the Clients may be charged or credited, as the case may be, the average transaction price. RJFS commission charges are the same for individual or block trades.

Item 12: Brokerage Practices

The Department of Labor Fiduciary Duty Rule

Retirement Accounts

Since 1974, the Employee Retirement Income Security Act ("ERISA") has empowered the Department of Labor ("DOL") to protect consumers who have retirement plans including defined benefit pension plans, Keogh, 401(k), Roth 401(k), 403(b), 457, SIMPLE, SEP and individual retirement accounts such as traditional IRA and Roth IRA plans. In 2016, after seven years of consideration and public comment, the DOL issued a rule effective April 10, 2017, designating as a "fiduciary" any financial professional who receives compensation for providing individualized retirement advice on retirement plans or IRAs. The DOL fiduciary rule, which requires brokers to act in the best interests of their clients, was partially implemented in June 2017. Full implementation of the DOL fiduciary rule, originally set for January 1, 2018, was delayed by the DOL several times following an executive memorandum issued by President Donald J. Trump asking the DOL to re-examine the rule's impact on consumers, the financial services industry, and the potential for an increase in litigation - and to rescind the rule if further analysis finds the rule causes harm.

The DOL sent a final rule for an 18-month delay to the Office of Management and Budget ("OMB"), which approved the measure. The transition period for full implementation of the DOL has been extended from January 1, 2018 through July 1,2019. The DOL will use the delay period to reassess the impact of the rule under the directive of President Trump. That review could lead to substantial revisions in the remaining parts of the rule.

The delay in the full implementation of the DOL Rule has postponed the BICE - Best Interest Contract Exemption – for 18 months. *See Item 12: Best Interest Contract Exemption (BICE).* The DOL Rule would have imposed new requirements for registered representatives and investment advisers to be paid compensation on securities transactions. What has been delayed was the January 1, 2018, requirement that for securities transactions with IRA owners - where compensation is paid on a transaction basis – the financial institution would have to enter into an enforceable written contract with the retirement investor that would include an enforceable promise to adhere to the Impartial Conduct Standards, an express acknowledgement of fiduciary status, and a variety of disclosures related to fees, services and conflicts of interest. The BICE contract, if signed, would provide retirement investors a right of action under state law to enforce their contractual rights, i.e., the right to conflict-free advice in their best interest. IRA owners otherwise do not have a statutory contractual enforcement right under ERISA.

Although full implementation of the rule has been delayed, the extension does not postpone sections which were enacted in June 2017. The Fiduciary Rule created the "Impartial Conduct Standards." In general, this means that (1) financial institutions and advisers must give prudent advice that is in the retirement investors' best interests (recommendations that are prudent and loyal), (2) charge no more than reasonable compensation, and (3) avoid misleading statements.

The Securities and Exchange Commission is working on its own fiduciary rule proposal that would apply to retail investment accounts. Published reports indicate that the DOL and SEC are cooperating in setting investment-advice standards.

SPC Financial, Inc. is a Fiduciary

To understand the impact which the DOL rule will have on SPC, it is important to understand some of the basic tenets of the law. We start with the question, "What is a fiduciary?" A fiduciary is a person or organization that owes a duty of good faith and trust to another. A fiduciary is obligated to act in a client's best financial interests. A stockbroker, registered investment adviser, insurance agent, or other type of adviser can be a fiduciary. The fiduciary duty standard enacted into law by the DOL for those providing financial advice means that the adviser must put the client's best interest ahead of the adviser's own financial interest. The DOL fiduciary duty rule is limited, however, to advice over retirement accounts because the DOL's jurisdiction over investments is limited to ERISA or retirement accounts.

As a SEC registered investment adviser firm, SPC always has adhered to fiduciary duty principles. There are two main legal bases for an investment adviser's fiduciary duties: common law and Section 206 of the Investment Advisers Act of 1940. As a fiduciary, SPC always has strived to put Clients first. SPC makes investment recommendations and decisions for Clients which it believes are in the best financial interests of the Clients. SPC makes an effort to understand Client objectives beyond just risk tolerance and time horizon in order to make investment decisions. SPC maintains a relationship of trust and confidence with Clients. Especially important is that SPC's fiduciary duty to Clients is not limited to their retirement accounts.

Brokerage Accounts vs. Managed-Fee Based Accounts

In considering Client objectives and needs, SPC typically considers whether it is better for Clients to be in a managed-fee based account or a brokerage account. Unlike a managed-fee based account, in a brokerage account only relationship, SPC

Item 12: Brokerage Practices

generally does not provide comprehensive financial planning and investment advice tailored around a specific financial plan. In a brokerage account relationship, Clients pay commissions on transactions, i.e., the purchase and sale of securities. In a managed-fee based account relationship, Clients do not pay commissions on transactions but instead pay an annual percentage fee based on Client assets under management.

SPC frequently advises Clients who have 401(k), 403(b) and 457 plans or government Thrift Savings Plans (TSPs) on whether they should roll-over their retirement accounts into Raymond James. The DOL rule prohibits SPC from receiving commissions for transactions within a Client's retirement brokerage account unless a BICE (Best Interest Contract Exemption) is entered into between Raymond James and the Client. *See BICE discussion below.*

Mutual Funds
The securities industry has been struggling under the DOL rule with how to treat various classes of mutual funds. One objective of the DOL rule is to require advisers to use the lowest cost share class available and to equalize or level the fees which clients pay for owning mutual funds. It is a challenge to level the costs of owning mutual funds in retirement accounts and IRAs because there are variations in front-end sales charges, recurring sales charges, and 12b-1 fees. The challenge is assessing which class of mutual fund shares is best for Clients because Client investment objectives, financial needs, and anticipated holding periods of mutual fund investments may change over time.

Class A shares typically charge a front-end sales charge, which means that a portion of the Client's dollars available for investment is not invested as the money is paid in the form of a commission to the broker. Class A shares may impose an asset-based sales charge (often 0.25%), however, that is lower than the asset-based sales charge imposed by Class B and Class C shares (often 1%). Class B shares typically do not charge a front-end sales charge but may impose asset-based sales charges on a recurring basis that may be higher than Class A shares. Class B shares also impose a contingent deferred sales charge (CDSC), which means that if the shares are not held for a certain duration, often 6 years, the CDSC is assessed when the shares are sold. If held for longer than the duration period, the CDSC is eliminated. Eventually, the Class B shares are converted to Class A shares and are charged the lower asset-based sales charge. Class C shares do not impose a front-end sales charge on the purchase so that the full dollar amount is invested. However, Class C shares typically impose higher asset-based sales charges than Class A shares, and because they generally do not convert into Class A shares, those fees are not reduced over time. SPC generally invests Client assets in only Class A or Class C shares. In the case of C share mutual funds, Raymond James and SPC anticipate that C shares already owned by a client will be grandfathered initially, but may be required to be converted to A shares. The timing of these changes is uncertain as SPC and Raymond James await clarity on the DOL rule.

Many mutual funds charge as an operational expense to fund investors what is known as a "12b-1 fee." The 12b-1 fee is used for annual marketing and distribution and is included in the fund's expense ratio. It generally ranges from 0.25% and 1% of a fund's net assets. The 12b-1 fee earned by the fund is shared with the adviser. The DOL rule considers this to be "conflicted" income and is not allowed unless a BICE (Best Interest Contract Exemption) is entered into between Raymond James and the Client. *See BICE discussion below.*

Best Interest Contract Exemption (BICE)
The delay in the full implementation of the DOL Rule has postponed the BICE – Best Interest Contract Exemption – for 18 months until July 1, 2019. It is presently uncertain whether Raymond James will implement a BICE or modified form of BICE on its own accord. The explanation below, therefore, is qualified in its entirety by (i) future decisions of the DOL that may materially change terms of the DOL rule or rescind all or parts of the rule, and (ii) future decisions by Raymond James on how it may interpret or implement the rule.

The BICE is a written contract between Raymond James and the Client. It will apply only to retirement accounts and IRAs carried at Raymond James as brokerage accounts, but will not apply to fee-based accounts with SPC. The BICE terms will include the following:

- A written acknowledgement of fiduciary status
- A statement that the firm and SPC will adhere to the Impartial Conduct Standards (meaning that advice must be in the best interest of clients, fees must be reasonable, and material conflicts must be disclosed)
- Warranties that Raymond James has and complies with written policies and procedures designed to ensure that SPC adheres to the Impartial Conduct Standards; that Raymond James has identified and documented its Material Conflicts of Interest and has adopted measures to prevent such conflicts from causing violations of the Impartial Conduct Standards; and that there are no incentives that encourage SPC to make recommendations that are not in the best interests of clients.

Item 12: Brokerage Practices

The DOL rule would have imposed restrictions on the payment of commissions in retirement brokerage accounts unless a BICE was entered between the client and Raymond James. In its desire to continue providing investment advice and services to clients with retirement brokerage retirement accounts, and to stay in front of the DOL rule's final implementation, SPC has been converting some of its Clients' brokerage retirement accounts into Fee-based asset managed accounts. All conversions are subject to the Clients' informed consent and only where appropriate for their needs. Realizing that managed fees may be costlier to Clients than commissions, SPC may analyze the amount of commissions paid in a brokerage account the previous 12 months and has offered Clients a fee cap reflective of those commissions. SPC expects that it will be converting more retirement brokerage accounts into Fee-based accounts.

Item 13: Review of Accounts

SPC IARs offer annual reviews/updates to all Clients. More frequent meetings may be triggered by a Client request, or by market or economic events, including changes in governing law. Portfolio Management Client accounts are periodically monitored by SPC IARs for ongoing correlation of the Client portfolio to the Client stated investment objectives and risk tolerance. Portfolio Management Clients (non-discretionary) are contacted by SPC IARs as warranted by changes in the Client portfolio allocation, portfolio performance, market or economic events, known changes in the Clients financial situation, changes in governing tax law, and new or varied securities offerings.

Clients are assigned a month each year for their annual review. SPC IARs and/or the Financial Planning department contact the Client for their current financial data. One or more Financial Planning team members prepares the Clients annual financial documents and submits to the IAR for their review. The IAR then conducts the Client annual meeting, occasionally in conjunction with Financial Planning staff.

SPC offers a variety of reports to Clients as applicable, including Client personal financial statements, retirement projections, an estimate of survivor needs at death, overview of education funding needs, and asset allocation reports, including Morningstar Detail and Snapshot reports. For Portfolio Management Clients, SPC also provides performance reports, including historical, realized gain and loss, and performance by security. Raymond James also furnishes either quarterly or monthly account statements to SPC Clients who maintain Raymond James accounts.

Item 14: Client Referrals and Other Compensation

If a Client acts upon the IAR advice and chooses to use one of RJFS's affiliates as a money manager, custodian or to purchase insurance, SPC or its IAR may receive compensation in the form of commissions from the affiliate. If a Client chooses to use an IAR in his individual capacity as an insurance agent, the individual IAR will receive a commission. Additionally, if a Client purchases a mutual fund containing a 12b-1 fee, SPC and the IAR may receive such fees.

As part of its fiduciary duties to Clients, SPC endeavors at all times to put the interests of its investment advisory Clients first. Clients should be aware, however, that the receipt of economic benefits by SPC or its related persons in and of itself creates a potential conflict of interest.

SPC does not pay for or receive compensation for client referrals.

Item 15: Custody

SPC is deemed to have custody of Client's assets as defined by SEC Rule 206(4)-2 because there are certain instances in which an IAR is a trustee on a Client's trust account or estate. All Clients will receive an account statement from the Custodian, which they should carefully review. SPC also provides performance reports to Clients. Clients are urged to compare the information received by the Custodian and Adviser and contact the Advisor with any questions.

Item 16: Investment Discretion

SPC obtains discretionary authority over Client accounts via the Client Agreements. A Client always maintains the right not to grant discretion to the Advisor if the Client chooses. An investment advisory Client who has delegated investment discretion to SPC or a third- party manager should be aware of their ability to impose reasonable restrictions on the investments made within their account(s), or reasonably modify existing restrictions they may have already imposed. Reasonable restrictions may include the designation of particular securities or types of securities that should not be purchased in their account (i.e. Company XYZ or companies involved in a particular industry, etc.), or should be sold if held in their account. However, since investment discretion has been delegated to SPC or a third-party manager, SPC or the manager may determine that the implementation of such a restriction may be impractical. In the event such a determination is made, the Client will be notified promptly.

As owner of the securities in their account(s), Clients, even if discretion has been granted, also have the right to:

1) Withdraw securities or cash from their account(s), provided they maintain the minimum account balance, as appropriate, based on their particular account type;

2) Vote securities or delegate the authority to vote securities to another person (i.e. proxies, tender offers, etc.);

3) Be provided written confirmation, in a timely manner, of securities transactions placed for their account; and

4) Proceed directly against any issuer (i.e. class action participation) and not be obligated to join other parties as a condition precedent to initiating such a proceeding.

Should a Client wish to impose or modify existing restrictions, or their financial condition or investment objectives have changed, they should contact their IAR or the SPC Compliance Department at 301-770-6800. An IAR may have a limited discretionary trading authority to determine the types and amount of securities bought and sold in a Client account. This authority is granted in writing by the Client for each account via a discretionary asset management agreement. The IAR cannot take possession of funds or securities. Clients should understand that Raymond James Financial stock (RJF) cannot be purchased and held in discretionary accounts. Doing so could create a conflict of interest due to an SPC IAR's personal affiliation with RJF and or their personal holdings of RJF stock and/or RJF stock options.

Even with discretion, SPC does not render advice to or take any actions on behalf of Clients with respect to any legal proceedings, including bankruptcies and shareholder litigation, to which any securities or other investments held in a Client's account, or the issuers thereof, become subject. SPC also does not initiate or pursue legal proceedings, including without limitation shareholder litigation, on behalf of Clients with respect to transactions, securities or other investments held in a Client's accounts. The right to take any actions with respect to legal proceedings, including shareholder litigation, with respect to transactions, securities or other investments held in a Client's account is expressly reserved to the Client.

SPC has contracted with an independent third party vendor, Chicago Clearing Corporation (CCC), to provide this service to SPC Clients who have consented to the release of Client Personally Identifiable Information by SPC to CCC. CCC is a claims filing specialist in securities class action settlements. CCC serves a wide range of investors and uses its experience to retrieve funds owed to the investor.

Item 17: Voting Client Securities

SPC does not vote proxies on the behalf of Clients. Clients should receive their proxy materials from the Custodian or transfer agent. However, in the event the Advisor receives such material, it will forward all proxy materials to Clients. Furthermore, the Advisor will not advise Clients on how to vote their proxies.

Item 18: Financial Information

SPC is deemed to have custody of Client assets as defined by SEC Rule 206(4)-2. SPC has not been subject to bankruptcy and knows of no reason that its financial condition would be impaired in meeting its contractual obligations to Clients. The most current balance sheet for SPC is attached in the back of this brochure.

SPC FINANCIAL, INCORPORATED

AUDITOR'S REPORT AND STATEMENTS OF FINANCIAL CONDITION

DECEMBER 31, 2016 AND 2015

SPC FINANCIAL, INCORPORATED

AUDITOR'S REPORT AND STATEMENTS OF FINANCIAL CONDITION

DECEMBER 31, 2016 AND 2015

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E. COHEN
AND COMPANY, CPAs
Building Profitable Ideas

INDEPENDENT AUDITOR'S REPORT

Board of Directors
SPC Financial, Incorporated
Rockville, Maryland

We have audited the accompanying statements of financial condition of SPC Financial, Incorporated (the Company) as of December 31, 2016 and 2015, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements
Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the financial statements that is free from material misstatement, whether due to fraud or error.

Auditor's Responsibility
Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion
In our opinion, the statements of financial condition referred to above present fairly, in all material respects, the financial position of SPC Financial, Incorporated as of December 31, 2016 and 2015, in accordance with accounting principles generally accepted in the United States of America.

E. Cohen and Company CPAs

February 24, 2017

One Research Court, Suite 101, Rockville, Maryland 20850
Tel: 301.917.6200 | Fax: 301.917.6220 | www.ecohencpas.com

PrimeGlobal
An Association of Independent Accounting Firms

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SPC FINANCIAL, INCORPORATED
STATEMENTS OF FINANCIAL CONDITION
DECEMBER 31, 2016 AND 2015

	2016	2015
ASSETS		
Current assets		
Cash and cash equivalents	$ 1,687,883	$ 1,629,598
Accounts receivable, net of allowance for doubtful accounts of $2,100 and $2,125 respectively	1,258	3,334
Prepaid expenses	104,915	96,312
Due from related party	8,371	8,180
Total current assets	1,802,427	1,737,424
Property and equipment, net	174,715	232,151
Other assets		
Deposits	18,805	19,255
Total assets	$ 1,995,947	$ 1,988,830
LIABILITIES AND STOCKHOLDERS' EQUITY		
Current liabilities		
Current portion of notes payable	$ 94,269	$ 92,286
Accounts payable	16,773	14,701
Accrued salaries and expenses	120,792	104,988
Current portion of deferred rent	27,037	14,679
Deferred revenue	34,575	30,400
Distributions payable	-	600,000
Total current liabilities	293,446	857,054
Long-term liabilities		
Notes payable, net of current portion	42,392	136,661
Deferred rent, net of current portion	333,939	360,977
Total liabilities	669,777	1,354,692
Stockholders' equity		
Common stock - no par value, 20,000 shares authorized, 15,000 shares issued and outstanding	6,940	6,940
Retained earnings	1,319,230	627,198
Total stockholders' equity	1,326,170	634,138
Total liabilities and stockholders' equity	$ 1,995,947	$ 1,988,830

See notes to financial statements.

SPC FINANCIAL, INCORPORATED
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2016 AND 2015

1. Organization and summary of significant accounting policies

Organization
SPC Financial, Incorporated (the Company) was incorporated on November 27, 1970, pursuant to the laws of the State of Maryland. On October 16, 1978, the Company filed an application with the Securities and Exchange Commission (SEC) to become an Independent Registered Investment Advisor, with approval granted October 23, 1978.

Cash and cash equivalents
The Company considers all cash and investment accounts with original maturities of three months or less to be cash equivalents. The Company maintains cash balances which may, from time to time, exceed federally insured limits. The Company does not believe that this results in any significant credit risk.

Accounts receivable
The face amount of accounts receivable is reduced by an allowance for doubtful accounts. The allowance reflects the best estimate of probable losses determined principally on the basis of historical experience and specific allowances for known troubled accounts. All accounts or portions thereof that are deemed to be uncollectible are written off to the allowance for doubtful accounts.

Property and equipment
Property and equipment are recorded at original cost and are depreciated, net of salvage value, using the straight-line method over useful lives of three to ten years.

Income taxes
Effective January 1, 2013 the Company, with the consent of its stockholders, elected under the Internal Revenue Code to be taxed as an S Corporation for federal and state income tax reporting purposes. The stockholders of an S Corporation are taxed on their proportionate share of the Company's taxable income. Therefore, no provision or liability for federal or state income taxes has been included in the financial statements as of December 31, 2016 and 2015. Certain specific deductions and credits flow through the Company to its stockholders.

The Company adopted the requirement of FASB ASC 740, which requires an assessment of uncertainty in income taxes and certain financial statement disclosures relating to recognition, measurement, and disclosure of uncertain tax positions.

Use of accounting estimates
The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

SPC FINANCIAL, INCORPORATED
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2016 AND 2015

1. Organization and summary of significant accounting policies (continued)

Deferred rent

Total non-contingent minimum lease payments due under noncancellable long-term operating leases are recognized as rent expense over the term of the leases on a straight-line basis. The excess of reported expense over payments due under the terms of the leases at the statement of financial condition date are reflected as deferred rent.

Deferred revenue

The Company recognizes revenue as earned. The unearned portion of revenue collected is reflected as deferred revenue in the accompanying financial statements.

2. Accounts and commissions receivable

All of the officers of the Company are registered representatives of an affiliated corporation, Raymond James Financial Services, Inc. (RJFS), which is a registered broker-dealer and is regulated by the Financial Industry Regulatory Authority (FINRA).

In their capacity as registered representatives of RJFS, the officers of the Company may receive commissions from broker/dealer securities transactions. All of this commission income from RJFS is assigned back to the Company by the officers. All of the commissions and fees are disclosed to the clients either through prospectuses, confirmations of trades, or written agreements with the portfolio manager, copies of which are provided to the clients.

Commissions receivable, included in accounts receivable, represents commissions earned from transactions, net of any clearing costs and fees. At December 31, 2016 and 2015, the net amount due to the Company from RJFS was $82 and $2,634 respectively. The remaining commissions receivable were due from non-related parties.

3. Property and equipment

Property and equipment at December 31, 2016 and 2015 consists of the following:

	2016	2015
Vehicles	$ 220,968	$ 282,688
Office furniture and fixtures	247,272	271,066
Office equipment and computers	59,096	61,362
Software	12,136	13,916
Leasehold improvements	28,850	45,305
	568,322	674,337
Accumulated depreciation	(393,607)	(442,186)
Property and equipment, net	$ 174,715	$ 232,151

SPC FINANCIAL, INCORPORATED
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2016 AND 2015

4. Long term debt

Long-term debt at December 31, 2016 and 2015 consists of the following:

	2016	2015
Notes payable to stockholder:		
Unsecured, due in monthly installments of $5,661, including interest at 5%, matures January 2018	$ 66,131	$ 129,044
Unsecured, due in monthly installments of $1,450, including interest at 6%, matures October 2017	14,110	30,137
Unsecured, due in monthly installments of $1,378, including interest at 6%, matures October 2020	56,420	69,766
Total	136,661	228,947
Less current portion	(94,269)	(92,286)
Long-term debt, net of current portion	$ 42,392	$ 136,661

At December 31, 2016, the scheduled future principal maturities of long-term debt are as follows:

Years Ending December 31,	Amount
2017	$ 94,269
2018	14,747
2019	15,501
2020	12,144
	$ 136,661

5. Stock purchase agreement

The Company has entered into a stock purchase agreement with the minority shareholders of the Company. Upon the death or termination of employment of these stockholders, the agreement calls for the purchase of the Company's stock by the Company from the stockholder or the estate of the deceased stockholder. The purchase price will be the fair market value of the stock as determined in accordance with the terms of the agreement. The determination of the purchase price is to be completed within 90 days of the Company's year-end. The maximum commitment for repurchase of stock effective January 1, 2017 is $613,200.

SPC FINANCIAL, INCORPORATED
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2016 AND 2015

6. Lease commitments

The Company leases office space in Rockville, Maryland, under a lease, expiring January 2022, which requires annual fixed increases of 3% per year over the lease term. The total minimum lease payments required under the lease are recognized as an expense over the term of the lease on a pro rata basis.

Total future minimum lease payments required under the office lease agreement as of December 31, 2016, are as follows:

Years Ending December 31,	Amount
2017	$ 424,313
2018	437,042
2019	450,153
2020	463,658
2021	477,568
2022	491,895
	$ 2,744,629

7. Related Party

During the years ended December 31, 2016 and 2015, an entity wholly owned by two of the stockholders had an informal agreement to reimburse the Company for administrative expenses incurred on their behalf. The balance due as of December 31, 2016 and 2015 was $8,371 and $8,180, respectively.

During the year ended December 31, 2016 the Board of Directors approved the sale of a Company automobile to one of the Company's stockholders, for $9,000. The net book value of the vehicle at the time of sale was $3,300.

8. Income taxes

Management evaluated the Company's tax positions and concluded that the Company has taken no uncertain tax positions that require adjustment to the financial statements as of December 31, 2016. The Company's tax returns for the years 2013 – 2015 remain subject to examination by the Internal Revenue Service and the State of Maryland. The calendar year 2016 income tax returns have not yet been filed.

SPC FINANCIAL, INCORPORATED
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2016 AND 2015

9. Employment agreements

The Company has employment agreements with several officers and employees that provide for certain disability and/or death benefits. The minimum cumulative contingent liability of the Company under these agreements was $2,077,125 at December 31, 2016.

10. Employee benefit plans

The Company has a SIMPLE IRA for all present and future eligible employees of the Company. The annual contribution to the Plan is a dollar for dollar matching of employee's contributions up to a maximum of 3% of the employee's compensation for the year. Company contributions are made each pay period. Employees vest immediately in all contributions.

During 2008, the Company established a flexible spending plan which is funded by employees through payroll deductions. The Company also established a health reimbursement plan under which employees may be reimbursed up to a specific limit per employee for out-of-pocket health costs. The liability under this plan, which assumes that 60% to 80% of the maximum benefit is actually incurred each year, is included in accrued salaries and expenses on the statements of financial condition.

11. Subsequent events

On January 3, 2017 a $600,000 distribution, to be paid on January 6, 2017, was approved for shareholders of record on December 31, 2016.

Management of the Company has evaluated events and transactions that occurred after December 31, 2016 through February 24, 2017, the date the financial statements were available to be issued, and has determined that, other than the approved distribution listed above, no subsequent events or transactions have occurred that require recognition or disclosure in the financial statements.

PRIVACY POLICY
SPC FINANCIAL, INC.

WHAT DOES SPC FINANCIAL, INC. DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: - Name - Date of Birth - Social Security Number - Insurance Policy Information - Address - Raymond James Account Information - Phone Number - Account Information & Balances
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons SPC Financial, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SPC Financial, Inc. share?	Can you limit this sharing?
For our everyday business purposes- such as to process your transactions and maintain your account(s).	**Yes**	**No**
For our marketing purposes- to offer our products and services to you.	**Yes**	**No**
For joint marketing with other financial companies.	**No**	**No**
For our affiliates' everyday business purposes- information is shared with SPC Financial, Inc.	**Yes**	**No**
For our affiliates to market to you.	**No**	**No**
For nonaffiliates to market to you.	**No**	**No**

To limit our sharing	- Email or call 1-301-770-6800 to speak to your financial advisor. **Please note:** If you are a ***new*** customer, we can begin sharing your information ***30*** days from the date we sent this notice; however, for our affiliates' everyday business purposes, information may be shared with SPC Financial, Inc. immediately. When you are ***no longer*** our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
Independence	Securities offered through Raymond James Financial Services, Inc. (RJFS). Investment advisory services offered through SPC Financial, Inc. SPC Financial, Inc. is not a registered broker/dealer and is independent of RJFS.
Questions?	Call your financial advisor at 1-301-770-6800

PRIVACY POLICY

SPC Financial, Inc.

Who we are	
Who is providing this notice?	SPC Financial, Inc.

What we do?	
How does SPC Financial, Inc. protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files, office space and buildings.
How does SPC Financial, Inc. collect my personal information?	We collect your personal information, for example, when you - Open an account or deposit money - Submit documents for financial planning purposes - Purchase an insurance policy **OR** We also collect your personal information from others, such as Raymond James Financial Services, Inc., Insurance companies, or e-Money Advisor.
Why can't I limit all sharing?	Federal law gives you the right to limit only ▪ sharing for affiliates' everyday business purposes information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for a service that is provided to me jointly with someone else?	Your choices will apply to everyone on your account unless you tell us otherwise.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Other important information	
State or local regulations	If, in addition to federal law, you are protected by specific state or local regulations concerning information sharing and marketing, SPC Financial, Inc. will fully comply with these regulations as well.
Chicago Clearing Corporation	SPC Financial, Inc. has contracted with Chicago Clearing Corporation to file and collect class action lawsuits on behalf of clients who maintain their account with Raymond James & Associates. We will automatically share investment and account information for clients who are residents of California, Vermont, Alaska, Maine, North Dakota, Massachusetts, Louisiana and who have signed a consent form. We will also automatically share investment and account information for all other clients unless they have signed a form requesting that we do not share this information (known as an "opt out" form). The services of Chicago Clearing Corporation are not those of Raymond James or SPC Financial, Inc.