

**OCEAN FINANCIAL SERVICES, LLC**

**BUSINESS CONTINUITY PLAN**

**Effective as of June, 2018**

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# **I. System Security**

## **A. Virus Protection**

All personal computers and laptops used by associated persons of Ocean Financial Services, LLC (“OFS”) have appropriate virus protection measures. Symantec virus protection software with automatic updates will be installed in all PCs and laptops. The server used by OFS is Symantec and also maintains appropriate virus protection measures and automatic updates.

## **B. System Security**

- (1) **Computers.** All personal computers and laptops are password protected. The password guidelines require the staff to change their passwords every 60 days. Staff are prohibited from disclosing their password(s) to any unauthorized person.
- (2) **Internet Access.** OFS has a CISCO Internet router and Checkpoint Firewall with the most current version of its operating system and URL filtering. OFS maintains a backup firewall in case our production firewall fails. The firewall is monitored by the Information Technology staff of Ocean Bank located in Miami, Florida. The Information Technology Staff of Ocean Bank performs the configuration and audit of the firewall. In addition, OFS has implemented an Intrusion Detection and Prevention System that will monitor all access to the WAN. In the event of a breach, OFS’s Chief Compliance Officer will be immediately notified. The severity of the breach will determine the steps to follow.
- (3) **Servers.** The server is located in a locked room. The only persons who have access to the server are the Information Technology staff of Ocean Bank.

## **C. E-commerce**

The Firm does not currently and does not intend to engage in e-commerce. Neither prospective nor existing clients will be using or accessing the Firm's systems.

## **D. Communicating with OFS via Email**

In the event there is a prolonged disruption (a disruption lasting more than 5 hours) to OFS’s email system that prohibits OFS from receiving email, OFS’s Chief Compliance Officer or designee will send a notification to all OFS customers or will place a notification on the Firm’s Web site, identifying an alternate email address to which all electronic communication should be addressed. OFS personnel will be able to access incoming emails sent to the alternate email address remotely. See **Appendix F** for access instructions.

## **E. Voice Mail Security**

OFS’s voice-mail system is password protected. Personnel may not disclose their passwords to any third party.

## **II. Data Backup and Recovery**

### **A. Data Storage**

The Firm maintains its hard copy books and records and its electronic records at its principal place of business located on the 6<sup>th</sup> floor of the building at 780 NW 42nd Avenue in Miami, Florida. The Chief Compliance Officer is responsible for the maintenance of all books and records.

### **B. Backup Routine for Paper Records**

OFS is required to store a wide range of books and records on an ongoing basis. The Firm maintains a File Guide listing the key compliance-related books and records stored and identifying whether such records are stored in a paper format or exclusively in an electronic format. Paper documents that the Firm would be unable to retrieve or recreate will be scanned so that a duplicate copy will be stored electronically. Paper documents may be relocated to an offsite storage facility after 2 years. An electronic copy of the following paper records will be maintained:

- (1) Executed Corporate Minutes
- (2) Executed FINRA Membership Agreement
- (3) Fidelity Bond
- (4) Clearing Agreement
- (5) Indirect Inquirer Agreement for the Lost and Stolen Securities Program
- (6) Regulatory correspondence (material correspondence from the SEC, FINRA, or a state regulatory authority, including manually signed responses to regulatory examinations)
- (7) All hardcopy correspondence received relating to the Firm's business (note that SEC Rule 17a-4(b)(4) requires the Firm to preserve originals of all communications received for at least 3 years)
- (8) For each Registered Representative ("RR"):
  - Manually signed initial Form U4 filed with CRD
  - Copy of fingerprint card filed with FINRA
  - Manually signed Form U4 DRP Amendment
  - Manually signed Eligibility Certification
  - Manually signed Pre-hire Background Authorization
  - FBI Investigation Reports
  - Manually signed Compliance Manual Acknowledgments
  - Manually signed Annual Compliance Questionnaires
  - Annual Compliance Meeting attendance documentation
  - Outside business activity requests/approvals
  - Private Securities Transactions requests/approvals
  - Manually signed Heightened Supervision Agreements
  - Manually signed Form U5
- (9) For each Non-registered Fingerprint ("NRF") staff member:
  - Copy of fingerprint card filed with FINRA
  - Manually signed Eligibility Certification
  - Manually signed Pre-hire Background Authorization
  - Manually signed Unregistered Employee Acknowledgement Form
  - FBI Investigation Reports
  - Private Securities Transactions requests/approvals
- (10) For each associated person for whom the Firm files a Schedule A/B Initial:
  - Copy of fingerprint card filed with FINRA
  - Manually signed Eligibility Certification
  - Manually signed Pre-hire Background Authorization
  - Manually signed Non-registered Attestation Form (if applicable)
  - FBI Investigation Reports
  - Private Securities Transactions requests/approvals
- (11) For each customer (as applicable):
  - Manually signed Customer Account Agreement
  - CIP documents

- Name change requests
  - Address change requests
  - Mail hold requests
  - Investment objective change requests
  - Manually signed penny stock disclosure acknowledgement
  - Manually signed penny stock written suitability statement
  - Manually signed penny stock transactions agreement
  - Day trading approval documents
  - Manually signed hedge fund suitability form
  - Customer complaints and responses
- (12) In connection with Firm Element training:
- Manually signed Firm Element Acknowledgment Forms (as applicable)
  - Feedback documentation (as applicable)
- (13) In connection with products:
- Due diligence material
- (14) Funds Received Log
- (15) Securities Received Log
- (16) Expense Sharing Agreement
- (17) Audited Financial Statements
- (18) Security breach correspondence
- (19) Annual Internal Inspection Report(s)
- (20) Independent AML Inspection Reports
- (21) Annual executed CEO Certification
- (22) Executed Audit Engagement Letter

OFS will scan newly created records at least semiannually. In the event of loss of the Firm's paper records, the Firm will recover them by downloading the scanned electronic version. All scanned documents will be backed up as described below.

C. **Backup Routines for Electronic Records**

Users will be saving the data to a centralized server. This server will be backed using an agent connected to a backup facility. Full and incremental backups will be performed.

D. **Performance Verification**

The Chief Compliance Officer has primary responsibility for ensuring that the backup process is performed. The Chief Compliance Officer periodically reviews the backup logs and will address any issues.

E. **Spare Hardware**

In the event Firm personnel need hardware to perform their duties during a business interruption, spare hardware is available at Ocean Bank. In the alternative, the Chief Executive Officer or designee may purchase additional hardware with the corporate credit card or his/her personal funds and will be reimbursed by the Firm for the expenses he/she incurs.

F. **Offsite Storage**

Original records will be maintained at the Main Office for at least a two-year period. After the two-year period, the Firm may relocate the records to an offsite storage facility (the "Archive Firm"), which will be secure and environmentally-controlled. Once the Archive Firm is selected, the Firm will update this Plan to identify the Archive Firm and briefly describe the facility's entry and environmental controls.

The Chief Compliance Officer will be responsible for document management and will coordinate the delivery and pickup of the records.

The Firm will maintain a spreadsheet of all records stored at the Archive Firm. The Firm may also store spare office materials at the Archive Firm. If it does so, it will itemize the stored materials in **Appendix I**.

### **III. Business Disruption Recovery Plan – General Information**

#### **A. Implementation Authority**

Manuel Del Cañal, the Firm's Chief Executive Officer, and Dulce Galindo, the Firm's Chief Compliance Officer, have the authority to approve and implement the Firm's Business Continuity Plan ("BCP"). Mr. Del Cañal has primary responsibility for implementation of this BCP. This BCP will be reviewed at least annually and updated as appropriate.

#### **B. Plan Location and Access**

The Firm will provide all personnel with a copy of the BCP. The Firm will maintain a hard copy of the original BCP, all amendments thereto and the current BCP on the premises of the Firm. An electronic version of the BCP will be stored on the Firm's computers and will be backed up. Personnel may request a new copy of the BCP from Ms. Galindo.

#### **C. Emergency Contact Persons**

The Firm's primary emergency contact person is Manuel Del Cañal, [mdelcanal@oceanfinancial.com](mailto:mdelcanal@oceanfinancial.com). The Firm's secondary emergency contact person is Dulce Galindo [dgalindo@oceanfinancial.com](mailto:dgalindo@oceanfinancial.com) , If the Firm appoints new emergency contact persons, the Firm will update this BCP and will update the names in the FINRA Contact System within 30 calendar days of the change. The Firm's Executive Representative, Mr. Del Cañal or designee will review the information provided on the FINRA Contact System at least annually, within 17 business days of each calendar year end, to ensure the accuracy of the emergency contact information provided therein, including the emergency contacts' name, title, mailing address, email address, telephone number, and facsimile number.

Contact information for key personnel of the Firm and key affiliates is located at **Appendix A**.

Contact information for external parties is located at **Appendix B**.

Contact information for technology support is located at **Appendix C**.

Contact information for the regulators is located at **Appendix D**.

#### **D. Description of Business**

The Firm is a registered broker/dealer. The Firm provides brokerage services to individuals, trusts and business entities, including institutional clients. The Firm operates from the premises of Ocean Bank. Registered Persons of the Firm may also be employed by Ocean Bank. Customers of Ocean Bank may be referred to the Firm. The Firm is an introducing firm and does not perform any clearing function for itself or others. The Firm does not maintain custody of customers' funds or securities. All customer funds and securities are maintained by the custodian or clearing broker/dealer carrying the brokerage account. The Firm accepts and enters orders. Orders are sent to the Clearing Firm for execution. The contact information for the Clearing Firm is located at **Appendix B**. The Clearing Firm executes orders and compares, allocates, clears and settles them. The clearing firm maintains the customer accounts, can grant customers access to the customer accounts, and delivers funds and securities.

The Firm operates from 2 registered offices and from no non-registered offices. The registered offices may engage in order taking and order entry activities. Office addresses and contact information are listed on **Appendix A**.

Staff may travel to each of these office locations by foot, by bicycle, or by car. Generally, taxi cabs service all locations.

Ocean Bank manages the building complexes and has a business continuity plan which includes contact information. The Chief Compliance Officer will maintain a copy of Ocean Bank's continuity plan.

#### E. **Introduction to Plan**

This BCP contains specific information that will allow our managers and staff to efficiently and effectively mobilize their efforts and respond in the event of a significant or material internal business disruption ("SBD"). Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Firm's ability to communicate and do business, such as a fire in our offices. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

Examples of an SBD follow:

- Extended loss of power
- Extended disruption to telecommunications (internet and telephone)
- Fire
- Flooding (pipes)
- Nuclear, biological or chemical fallout
- Bombs or the threat of bombing
- Terrorist attack
- War
- Hurricane, earthquake or other natural disaster
- Pandemic

It is important to take into account that the Firm has an agreement with Ocean Bank, by which, the latter provides Management Information System and Personnel services to the Firm. These services include the coordination of the disaster recovery effort.

#### F. **Objectives of the Plan**

The Firm's goal is, first and foremost, to **safeguard the lives of its personnel**. The secondary goals during an SBD follow:

- Safeguard the Firm's property, including regulatory books and records
- Make, as appropriate, financial and operational assessments
- Assure that customers can access their funds and securities
- Continue to transact business
- Restore normal business operations

The itemization of tasks in the following section provides a guideline of assigned responsibilities to be followed in the event of an SBD (other than a pandemic). This is a guideline only and the facts and circumstances surrounding an SBD or threat of an SBD may require additional or different steps to be taken.

Note that the Firm's Pandemic Preparedness Plan is attached as **Exhibit II**.



## **IV. Business Disruption Recovery Plan**

### **PHASE 1 –EARLY PREPARATION**

Early preparation will take place when a Hurricane Watch has been issued for Miami-Dade County. Preparation will involve notification to staff, review of plan details with key personnel, and identification of persons, if any, who will be removed to a Remote Site. Plan implementation will begin when a Hurricane Warning has been issued for Miami-Dade County.

#### **Hurricane Watch:**

Hurricane conditions are possible in the specified area of the watch usually within 36 hours. During Hurricane Watch prepare to take immediate action to protect your family and property in case a Hurricane Warning is issued.

#### **Hurricane Warning:**

Hurricane conditions are expected in the specified area of the watch usually within 24 hours. Complete all storm preparation and immediately follow local emergency management advice about evacuating dangerous or low-lying locations.

**TASK 1:** Decide severity of the threat; hold meeting.  
Responsible: Manuel del Cañal

If the threat is imminent (e.g. fire; terrorist attack) and evacuation is advisable, evacuate all personnel immediately. All essential tasks may be performed from a remote location. Keep in mind that the Firm's primary goal is the safety and well being of its staff.

Following are specific steps to take in response to the following types of imminent threats or disasters:

<b>Threat</b>	<b>Specific Measures</b>
Extended loss of power	Contact Building Management
Extended disruption to telecommunications (internet and telephone)	Contact Building Management; Contact IT Support
Fire	Evacuate Immediately <ul style="list-style-type: none"> <li>▪ fire extinguishers are located in every floor of the building as well as in designated areas of the parking garage.</li> <li>▪ remind personnel to use stairwell</li> </ul> Call 911 Contact OB Security Dept/Building Management
Flooding (pipes)	Contact Building Management
Nuclear, biological or chemical fallout	Call 911 Contact OB Security Dept/Building Management <ul style="list-style-type: none"> <li>▪ if threat is outdoors, may need to be quarantined inside</li> </ul>
Bombs or the threat of bombing	Call 911 Contact OB Security Dept/Building Management
Riots	Call 911. Contact OB Security Dept/Building Management
Terrorist attack	Call 911
Earthquake or other natural disaster	Take cover under desk; in doorway Contact Building Management for building

	closures
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If the threat is not imminent, tasks 2 through 13 may be completed onsite and the Firm should hold a meeting. All employees should attend this meeting. The tasks should be reviewed and revised as appropriate, a primary off-site location should be selected, and, if any revisions to the Plan are made, the revised Plan should be distributed to all personnel. Mr. del Cañal may consider forming a Disaster Recovery Committee to coordinate recovery efforts.

**TASK 2:** Inform Clearing Firm of impending threat. See **Appendix B.**  
Responsible: Manuel del Cañal, Dulce Galindo

**TASK 3:** Verify that contingency email addresses and cellular phones for the Firm’s key personnel (see **Appendix A)** and IT contacts (see **Appendix C)** are operational.  
Responsible: Manuel del Cañal, Dulce Galindo

**TASK 4:** Identify Remote Site and make hotel reservations if appropriate.  
Responsible: Manuel Del Cañal or designee

In the event of an SBD, the Firm may relocate its staff from affected offices to the closest of its affiliates’ unaffected office locations. If the Firm will be continuing its business operations at an affiliate's office location, notify the principal contact of such office of the Firm's temporary relocation to those offices. Supplies and equipment will be available at all affiliates' offices. Additional supplies can be purchased by Mr. Del Cañal, or Ms. Galindo and such expenses will be reimbursed by the Firm.

If none of OFS’s office locations or its affiliate’s locations is available to receive staff, the Firm will relocate its staff to a Remote Site, which may be a hotel. This will be coordinated with Ocean Bank CBP Coordinator. Contact information for hotels is listed at **Appendix G.**

The exact location of the hotel will depend on the scope of the disaster. Where a hurricane is threatened, a location will be chosen outside of the hurricane’s expected path. The location and contact information of the selected remote location will be communicated to all personnel, via an in-person meeting, by telephone, or via email.

In the alternative, and if appropriate, key staff will be instructed to work from their respective residences.

**PHASE 2 –IMPLEMENTATION (e.g. Hurricane Warning has been Issued)**

**TASK 5:** Notify affiliates and FINRA Coordinator of implementation.  
Responsible: Manuel del Cañal, Dulce Galindo

**TASK 6:** Notify the Clearing Firm of implementation.  
Responsible: Manuel del Cañal, Dulce Galindo

When contacting the Clearing Firm, describe the nature of the disruption, provide a list of critical contacts and how they can be reached, and outline the issue to the Customer Service Managers on what the Clearing Firm should tell the customers regarding the business disruption.

Note that the Clearing Firm will perform liquidation-only transactions, check requests and wire requests directly from customers with proper letters of authorization. COR will not accept purchase or buy orders.

Notification instructions for the Clearing Firm are set forth on Appendix B.

**TASK 7:**

Box up current work.  
Responsible: All Personnel

If personnel will be working from a location other than their residences, personnel should box up the documents they need and give the box(es) to Manuel del Cañal who will coordinate the delivery of the documents to the Remote Site. If personnel will be working from their residences, each person should record which documents are being removed and provide that list to Manuel del Cañal or designee.

**TASK 8:**

Coordinate delivery of office supplies to Remote Site.  
Responsible: Manuel del Cañal, Dulce Galindo

If office supplies will be required at Remote Site, and the Firm is not able to take supplies from the office, contact the Archive Firm to schedule delivery or pick up.

**TASK 9:**

Fund Clearing Firm account, if appropriate  
Responsible: Manuel del Cañal or the FinOP

- a. Give instructions to Bank of America to wire sufficient funds to cover possible pending transactions.  
Wire transfer instructions follow:

The Bank of New York  
ABA 021000018  
COR Clearing  
8900620633  
For further credit to:  
Customer Name  
Eight Digit Customer Account number

Additional information if needed:  
Swift Code IRVTUS3N  
The Bank of New York  
1 Wall Street  
New York NY10286  
Phone 212-495-1784

- b. The Clearing Firm can be contacted at 402-384-6100 or 800-811-3487.

**TASK 10:**

Designate the registered principals who will be required to take telephone instructions for securities transactions.  
Responsible: Manuel del Cañal, Dulce Galindo

Instruct the designated persons to keep their cellular phones or other communication devices (as agreed upon) in close proximity to their person during regular business hours throughout the duration of the disaster so that customer orders may be taken and relayed to the Clearing Firm.

**TASK 11:**

Record greeting for all incoming calls to the Firm.  
Responsible: Manuel del Cañal, Dulce Galindo

The following message is a sample message that may be recorded:

*Thank you for calling Ocean Financial Services, LLC. Today is [insert date]. Due to an emergency situation, we have evacuated our offices and have implemented our disaster recovery program. If you require immediate assistance, please contact us at \_\_\_\_\_. If you would like to place a securities transaction, please contact \_\_\_\_\_ at \_\_\_\_\_. We will update this message periodically to advise you of our scheduled return to normal business operations.*

This message must include a telephone number of a registered principal of the Firm who can take all telephone instructions for securities transactions.

**TASK 12:** Meet to review strategy and designate remote site.  
Responsible: All Personnel

All personnel should attend this meeting. Assign responsibilities and duties. Contact Ocean Bank's telecommunications department staff to provide them with the remote site and/or numbers where calls need to be re-directed. The telecommunications staff is responsible for forwarding the calls to the remote site.

**TASK 13:** Shut down operations.  
Responsible: All Personnel

Disconnect computers. Disconnect telephones. Take laptops. Depending on nature of the disaster and time considerations, box up or cover computers and relocate computer equipment from floor to desktop or other elevated area (in the event of flooding).

### **PHASE 3 – OFFSITE OPERATIONS**

**TASK 14:** Establish offsite operations at Remote Site.  
Responsible: Manuel del Cañal, Dulce Galindo

- a. Setting up an alternate computer system may be unnecessary since key personnel will have laptops with them that can be connected to the Internet.
- b. Send an email to current clients for whom the Firm has obtained email addresses and provide such clients with new contact information.
- c. If appropriate, change telephone greeting at the Firm's offices to provide Remote Site contact information.

### **PHASE 4 – RECOVERY**

**TASK 15:** Assess the damage.  
Responsible: Manuel del Cañal, Dulce Galindo

- a. Contact the Building Manager for assessment information.
- b. Key people will be assigned to assess the damage after the disaster. They will determine whether the facility will be made operational within a short time, or whether an alternative long-term location is required. If an alternative long-term location is required, communicate needs to the Firm's members and commence search for alternative office space. Coordinate search with OB plan.
- c. If appropriate, identify appropriate parties to conduct a search and salvage operation.

**TASK 16:** Schedule return to Offices.  
Responsible: Manuel del Cañal, Dulce Galindo

- a. Prior to return, the building must be inspected for possible structural deficiencies.
- b. The wiring must also be inspected for any visible hazards.
- c. Communicate return date to all personnel. See **Appendix A** for contact information. See **Appendix J** for call tree and residential proximity table (persons who live in close proximity to each other and may be able to make contact in person.)
- d. Return archived materials to Archive Firm.

## V. **Business Continuity**

### A. **Operational Risk**

In the event of an SBD, Mr. del Cañal or Ms. Galindo will immediately identify what means will permit the Firm to communicate with its customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options the Firm may elect include telephone, telephone voice mail, facsimile, secure email, express mail delivery, and U.S. mail. In the event of an emergency, the Firm may utilize instant messaging and text messaging, where available, even though the use of these methods of communication is normally not permitted.

### B. **Financial and Credit Risk**

In the event of an SBD, Mr. del Cañal or the Firm's FinOP will determine the value and liquidity of the Firm's investments and other assets to evaluate the Firm's ability to continue to fund its operations and remain in net capital compliance. If Mr. del Cañal, in consultation with the Firm's FinOP, determines that the Firm may be unable to meet its obligations or to otherwise continue to fund its operations, Mr. del Cañal will request its shareholders to make a capital contribution to the Firm or will request financing from the Firm's bank or other credit sources to fulfill the Firm's obligations to clients and other parties. We will contact our clearing firm, critical banks and investors to apprise them of our financial status. If the Firm is not able to immediately remedy a capital deficiency, the Firm's FinOP or designee will file the appropriate notices with the regulatory authorities and outline the steps the Firm will take to remedy the deficiency.

### C. **Alternate Communication between the Firm and its Customers**

The Firm now communicates with its customers using the telephone, e-mail, fax, U.S. mail, and in person visits at our Firm. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with the customer by e-mail but the Internet is unavailable, we will contact them via the telephone and, when appropriate, follow up the communication with a hard copy confirmation of the communication to be sent to the customer by the U.S. mail.

### D. **Customers' Access to Funds and Securities**

The Firm does not maintain custody of customers' funds or securities. In the event of an internal or external SBD and the Firm elects to move operations to a Remote Site, clients contacting the Firm via its main telephone number will be redirected to a telephone number at the Remote Site or to a registered principal's cellular or alternative telephone number. The designated registered principal will take client instructions via telephone at the telephone number provided and contact the Clearing Firm on the client's behalf to enter such instructions. Mr. del Cañal or Ms. Galindo will contact the Clearing Firm at the earliest opportunity to advise them of the SBD event.

If the Firm's IT personnel is able to access the Firm's web site and modify its content, the Firm will post on the web site a notification to customers that they may access their funds and securities by contacting the Clearing Firm directly. The Firm will make this information available through its disclosure policy.

Information regarding accessibility to the Clearing Firm and Bloomberg is located at **Appendix E**.

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

### E. **Alternate Communication between the Firm and its Employees and Key Contacts**

We now communicate with our employees and key business contacts in-person and by telephone and email. In the event of an SBD, Manuel del Cañal or designee will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that the Firm has used in the past to communicate

with the employees and key contacts. The Firm will also employ a call tree so that the Firm can reach all employees and key contacts quickly during an SBD. A Call Tree is located at Appendix H.

F. Maintenance Contracts

All personal computers, laptops, and servers are covered by a standard next day warranty. IT contact information is provided on Appendix C.

G. Mission Critical Systems

The Firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

The Firm has primary responsibility for establishing and maintaining our business relationships with our customers and has sole responsibility for our mission critical functions of order taking and order entry.

(a) Order Taking

Currently, the Firm might receive orders from customers via telephone/facsimile/e-mail/in person visits by the customer. During an SBD, Mr. del Cañal or designee, will identify which registered persons will be authorized to continue to accept orders from customers and will identify those methods the registered persons may use, which are available and reliable. As communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by contacting our office and being redirected to one or more designated persons. If necessary, we will advise our customers to place orders directly with our clearing firm.

(b) Order Entry

Currently, the Firm enters orders by recording them and sending them to our clearing firm electronically. *Alternatively*, the Firm places customer orders by telephone directly with the appropriate desk.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include telephone, facsimile, email, and administrative wire. When selecting a Remote Site, internet connectivity will be a primary consideration. If internet service is unavailable at the Remote Site, the Firm will place transactions in the customer accounts via telephone and/or facsimile. If both telephone service and internet service is not available at Remote Site, Mr. del Cañal will consider relocating to an alternate location where service may be available. We also may instruct customers to contact the Clearing Firm directly for order entry.

Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

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

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing, and it has confirmed that it tests its back-up arrangements periodically.

The Clearing Firm's recovery time objective for business resumption, including those involving a relocation of personnel or technology, is four (4) hours. Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure (particularly telecommunications) can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond the Clearing Firm's control.

#### H. **Business Constituents**

The Firm has contacted its critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing the Firm with critical services), and determined the extent to which we can continue our business relationship with them in light of an internal or external SBD.

We will promptly establish alternative arrangements in the event a business constituent becomes unable to provide necessary goods or services due to an SBD affecting them or us. Our major suppliers are listed below:

- Clearing and Settlement – Cor Clearing, 9300 Underwood Ave, Ste. 400, Omaha, NE 68114  
402-384-6100 or 800-811-3487
- Telecommunications – ATT, 7300 NW 19<sup>th</sup> Street, Miami, FL 33126 Tel: 305-569-7346 Cell/24 Hrs: 954-394-0556
- Email Hosting and Surveillance – Smarsh, 921 SW Washington Street, Suite 540, Portland, OR 97205 Tel: 866-762-7741
- Infrastructure & General Services - Ocean Bank, 780 NW, 42<sup>nd</sup> Avenue, Miami, FL 33126 Tel:305 569-5000

#### I. **Data Restoration and Recovery of Records**

In the event the Firm needs to restore data to its systems at the Firm's offices, the Firm will obtain the data from its backup location. If the Firm needs to recover paper records, it will download the electronic copy. IT personnel at Ocean Bank may assist in the recovery of documents.



## **VI. Communication with Regulators**

### **A. Alternate Communication with Regulatory Authorities**

The Firm is subject to regulation by the SEC, FINRA, and the State of Florida.

The Firm communicates with its regulators using the Internet, telephone, facsimile, U.S. mail and express mail delivery. In the event of an SBD, Manuel del Cañal or designee will assess which means of communication are still available to the Firm and use the means closest in speed and form (written or oral) to the means that the Firm has used in the past to communicate with the regulators. Contact information for the regulators is located at **Appendix D**.

### **B. Regulatory Reporting Obligations**

We now file reports with our regulators using paper copies in the U.S. mail, and electronically through the Internet and via email. In the event of an SBD, we will contact the appropriate regulatory authority to determine which means of filing are still available to us, and use the means closest in speed and form (which may be written or oral) to our previous filing method. In the event we are unable to contact the regulators, the Firm will continue to file required reports using the communication means available to us

## **VII. Disclosure of Business Continuity Plan**

The Firm discloses in writing a summary of its BCP to customers upon establishment of the account. The Firm will also mail the BCP summary to its customers upon request.

The BCP summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope. In addressing the events of varying scope, our summary (1) provides scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, and a regional disruption); (2) states whether we plan to continue business during that scenario and, if so, our planned recovery time; and (3) provides general information on our intended response. Our summary discloses the existence of back-up facilities and arrangements. The BCP summary includes cautionary language that the plan is subject to modification and advises that customers may obtain an updated summary by mail by requesting a copy.

## **VIII. Management Succession**

In the event any of the following persons becomes incapacitated or, during an SBD, cannot be located or are unable to continue their normal duties, their authorities and duties shall, without further action by the shareholders or Board of Directors, be automatically assumed by the following persons in the sequence designated.

Principal: **Manuel del Cañal**  
Backup: Dulce Galindo  
Duties: All duties may be assumed by Ms. Galindo maintains the necessary qualifications to assume the duties of Mr. del Cañal.

Principal: **Dulce Galindo**  
Backup: Manuel del Cañal  
Duties: All duties may be assumed by Mr. del Cañal. Mr. del Cañal maintains the necessary qualifications to assume Ms. Galindo's compliance duties.

Principal: **Jonathan Jones**  
Backup: Manuel del Cañal  
Duties: In the event of the FinOP's prolonged absence, the Firm may rent a FINOP for the interim to handle the FinOP responsibilities and may consider requiring another Registered Principal to qualify as a FinOP.

The authority of the above-named individuals shall continue until the duly elected officer becomes available to perform the duties assumed or until the Board of Directors appoints another individual to assume those duties.

## **IX. Review and Approval**

### **A. Periodic Assessments**

Mr. del Cañal or designee will periodically, but not less frequently than annually, assess the changes in the Firm's exposure to operational risk and financial and credit risk and make the appropriate changes to this BCP as each assessment dictates. In addition, Mr. del Cañal or designee shall assess all operational risks and financial and credit risks of the Firm any time the disaster recovery procedures are implemented and shall make any necessary adjustments to the procedures at that time to ensure that the operational risks and financial and credit risks are minimized.

### **B. Updates and Annual Review**

Mr. del Cañal designee will update this Plan whenever there is a material change to the Firm's operations, structure, business or location. In addition, Mr. del Cañal will conduct a thorough review of this BCP not less frequently than annually to assure that all requisite modifications have been made and shall make any further modifications as appropriate. If the Firm has suffered a material business disruption within the 12 months preceding the review, an assessment of the implementation of the Plan will be included in the review. A copy of the revised BCP shall be provided to all personnel. The Firm's Main Office will maintain a current copy of the BCP.

### **C. Management Approval**

A member of Senior Management will approve this Plan and each material amendment to this Plan. Approval will be evidenced by the execution of a Senior Management Approval Form. The Firm will maintain the Approval Forms on a six-year historical basis.

## Appendix A – Internal Contact List

(Last Updated: *Insert Month, Year*)

### OFS OFFICE LOCATIONS

Address	Telephone Number	Facsimile Number	Person-In-Charge
780 NW 42 <sup>nd</sup> Avenue, Suite 604 , Miami, FL <a href="#">MAP</a>	305 461-6940	305 461-6941	Manuel del Cañal
1000 Brickell Avenue, 12th Floor, Miami, FL <a href="#">MAP</a>	305 808 1001	305 808 1002	Manuel del Cañal

### OFS KEY PERSONNEL

Position	Name	Alternate Email	Home Phone	Cell Phone	Home Address
CEO	Manuel del Cañal	<a href="mailto:mdelcanal@oceanbank.com">mdelcanal@oceanbank.com</a>	N/A	786-516-5764	10603 SW 128 PLACE MIAMI, FL 33186
CCO	Dulce Galindo	<a href="mailto:dulcegalindo@hotmail.com">dulcegalindo@hotmail.com</a>	N/A	787-458-0323	5112 NW 116 <sup>th</sup> Ct DORAL FL 33178
FinOP	Jonathan Jones	<a href="mailto:myfinop@gmail.com">myfinop@gmail.com</a>	954-734-6034	954-913-0943	7381 Royal Palm Blvd. Margate, FL 33063

## Appendix B – External Contact List

### CLEARING FIRM

Position	Name	Email	Telephone
Client Service Manager	Amy ausdemore	Amy.ausdemore@corclearing.com	1-866-774-0218
Trade Desk	Execution Services	<a href="mailto:executionservices@corclearing.com">executionservices@corclearing.com</a>	800-776-5778
OTC Trading	Execution Services	<a href="mailto:executionservices@corclearing.com">executionservices@corclearing.com</a>	800-776-5778
Fixed Income Trading	Execution Services	<a href="mailto:executionservices@corclearing.com">executionservices@corclearing.com</a>	800-776-5778

To notify COR Clearing of BCP implementation, contact either:

Brian Strasser, Vice President  
402-384-6180  
[Brian.Strasser@corclearing.com](mailto:Brian.Strasser@corclearing.com) OR

Customer Service  
800-811-3487 or 402-384-6101  
[customerservice@corclearing.com](mailto:customerservice@corclearing.com)

### BLOOMBERG

Position	Name	Email	Telephone
Professional Service Support	(24-hour technical support line)		212-318-2100
Sales Relationship Manager	TBD		
Account Manager	TBD		
Technical Support	TBD		

### LEGAL COUNSEL

Firm	Name	Email	Telephone	Cell Phone	Address
<a href="#">ARHM&amp;F</a>	Alcides Avila	<a href="mailto:aavila@arhmf.com">aavila@arhmf.com</a>	305-779-3570	305 795 1630	2525 Ponce de Leon Blvd. PH 1225, Miami, FL 33134
<a href="#">ARHM&amp;F</a>	Patricia Hernandez	<a href="mailto:phernandez@arhmf.com">phernandez@arhmf.com</a>	305-779-3566	305-903-5598	2525 Ponce de Leon Blvd. PH 1225, Miami, FL 33134
RCS	Kelley Peterson	<a href="mailto:kelly@regcompsolutions.com">kelly@regcompsolutions.com</a>	954-447-1951	865-283-1001	12305 Yarnell Rd., Knoxville, TN 37932

### BANK

Bank of America  
ABA Florida Wires: Florida; 026009593  
ACH Routing; 063100277  
Swift: BOFAUS3N  
[www.bankofamerica.com](http://www.bankofamerica.com)  
Client Services: 888-852-5000

### OFFSITE STORAGE FACILITY

TBD

**OTHER EMERGENCY NUMBERS**

OB Building Management Office 305 446 4005

OB Security Department **305 569-5147**

Miami-Dade Police Department **911**

Non-Emergency (Miami) 305-4-POLICE  
305-595-6263

Miami-Dade Fire Department **911**

Non-Emergency (Miami) 305-596-8600

Area Hospitals

<b>Name</b>	<b>Address</b>	<b>Telephone</b>
Baptist Hospital of Miami	8900 North Kendall Drive Miami, FL 33176 <a href="#">MAP</a>	786-596-1960
Jackson South Community	9333 SW 152 <sup>nd</sup> Street Miami, FL 33157 <a href="#">MAP</a>	305-251-2500
Kendall Medical Center	11750 SW 40 Street Miami, FL 33175 <a href="#">MAP</a>	305-223-3000
Coral Gables Hospital	3100 Douglas Rd. Coral Gables, FL 33134 <a href="#">MAP</a>	305-445-8461

Poison Control Center 800-942-5969

Postal Services 305-470-0328

## Appendix C – IT Contact Information

<b>Firm</b>	<b>Name</b>	<b>Email</b>	<b>Alternate Email</b>	<b>Telephone</b>	<b>Home</b>
Ocean Bank Network Manager	Luis Aveillez	<a href="mailto:Aveillez@oceanbank.com">Aveillez@oceanbank.com</a>	<a href="mailto:aveillez@gmail.com">aveillez@gmail.com</a>	305-569-5362	305-599-8901
Ocean Bank Telecom Officer	Rita Docal	<a href="mailto:rdocal@oceanbank.com">rdocal@oceanbank.com</a>	N/A	305-569-5426	N/A
Ocean Bank Network Infrastructure Manager	Victor Trillo	<a href="mailto:vtrillo@oceanbank.com">vtrillo@oceanbank.com</a>	<a href="mailto:vtrillo@gmail.com">vtrillo@gmail.com</a>	305-569-5286	305-648-1176
Ocean Bank Director of IT	Jorge Fernandez	<a href="mailto:jorge@oceanbank.com">jorge@oceanbank.com</a>	N/A	305-569-5635	N/A
Smarsh (Email Archiving Firm)	Bryan Rindfus	<a href="mailto:BRindfus@smarsh.com">BRindfus@smarsh.com</a>	N/A	866-762-7741	N/A



## **Appendix D – Contact List for Regulators**

### **FINRA Boca Raton Office**

Crystal Corporate Center  
2500 N. Military Trail, Suite 302  
Boca Raton, FL 33431-6324  
(561) 443-8000  
Fax: (561) 443-7995  
Acting Director: Jeffrey M. Pasquerella  
Coordinator: **Mayte Lujan**  
Coordinator's Email: **Mayte.Lujan@finra.org**

[View Map](#)

### **FINRA Atlanta District Office**

One Securities Centre, Suite 500  
3490 Piedmont Road, NE  
Atlanta, GA 30305  
(404) 239-6100  
Fax: (404) 237-9290  
Director: Daniel J. Stefek

[View Map](#)

### **FINRA Central Registration Depository**

Main Telephone Number: 301-590-6500

### **SEC Regional Office**

Southeast Regional Office  
Regional Director: Eric Bustillo  
801 Brickell Ave., Suite 1800  
Miami, FL 33131  
(305) 982-6300  
e-mail: [miami@sec.gov](mailto:miami@sec.gov)

[View Map](#)

### **Florida Securities Department**

Office of Financial Regulation  
200 East Gaines Street  
Tallahassee, FL 32399-0372  
(850) 410-9500  
(850) 410-9748 (Fax)

[View Map](#)

## **Appendix E – Clearing Firm and Bloomberg Connection**

During the implementation of a disaster recovery plan, one can continue to access Bloomberg and the Clearing Firm. Following are the steps you must follow to connect remotely.

### **Bloomberg**

To access Bloomberg anywhere on a mobile device or iPad, visit <http://m.bloomberg.com> from your mobile device's browser to download and install the latest Bloomberg Anywhere App.

All the information regarding Bloomberg connectivity is set forth on the [Transport and Security](#) document, starting on page 5. (Link available at [http://www.bloomberg.com/professional/files/2013/08/Transport\\_and\\_Security\\_Specification.pdf](http://www.bloomberg.com/professional/files/2013/08/Transport_and_Security_Specification.pdf).)

### **Clearing Firm**

You can access COR Clearing using the Thomson One online platform or Sunguard page:  
[https://corclearing.automatedfinancial.com:8843/secure\\_login.html](https://corclearing.automatedfinancial.com:8843/secure_login.html).

## **Appendix F – Accessing Email**

During the implementation of a disaster recovery plan, one can continue to access the assigned Email. Following are the steps you must follow to connect remotely.

### **Smarsh Email**

To access email anywhere on a mobile device or iPad, visit <https://mail03.smarsh.com/webmail/> from your mobile device's browser to login with you user and password.

## **Appendix G – Remote Site/Hotel Listing**

We have identified the following Remote Sites, including hotels, as possible places where the Firm may establish its alternate headquarters for a limited time period.

OFS Brickell Office has been chosen as the Firm's primary Alternate Location in the event of a Disaster. It is located at 1000 Brickell Avenue, 12<sup>th</sup> Floor, Miami, FL. The main telephone number is 305 808-1001 and the fax number is 305 808 1002. Mr. del Cañal will identify which personnel should meet at the Alternate Location and will coordinate the times the personnel will work from the Alternate Location and will communicate this information by contacting the personnel at their home telephone number, on their cell phone, through email, or in-person. Telephone numbers and email addresses are provided on **Appendix A**. All personnel should remember that their welfare and safety is paramount. If local officials have advised personnel to stay indoors, no personnel should leave their home. If personnel feel that their health, welfare or safety may be compromised by travelling to the Alternate Location, personnel should not travel to the Alternate Location.

If the Disaster has the possibility of affecting our operations for more than 72 hours we have identified the following hotels, as possible places where we would set up our alternate Headquarters.

### **Miami, Florida**

**InterContinental**  
2505 NW 87<sup>th</sup> Ave  
Miami, FL 33172  
(305) 468-1400

**Country Inn & Suites**  
11750 Mills Drive  
Miami, FL 33183  
(305) 270-0358

### **Naples, Florida**

**Comfort Inn Exec Suites**  
3860 Tollgate Blvd  
Naples, FL 34114  
239-353-9500

### **Ft. Lauderdale, Florida**

**Comfort Inn & Suites**  
3551 W. Commercial Blvd  
Ft. Lauderdale, FL 33309  
954-733-1557

**Embassy Suites**  
1100 Southeast 17<sup>th</sup> Street  
Ft. Lauderdale, FL 33316  
954-527-2700

### **Orlando, Florida**

**Embassy Suites**  
191 East Pine Street  
Orlando, FL 32801  
Tele: 407-841-1000  
Fax: 407-835-6856  
Reservations: 800-228-9290

**Orlando Marriott Downtown**  
400 West Livingston Street  
Orlando, FL 32801  
Tele: 407-648-5188  
Fax: 407-648-5414  
[www.marriott.com](http://www.marriott.com)

# Appendix H – Call Tree & Residential Proximity Table

## CALL TREE

Manuel del Cañal



**RESIDENTIAL PROXIMITY TABLE**

South of Miami		Doral	
Sandro Olivos	8945 SW 207 Street Cutler Bay, FL 33189	Angie Rodrigues	7476 NW 115th ct Miami FL 33178
Manuel del Cañal	10603 SW 128 Place Miami FL 33186	Maria Leonor Rojas Palacios	10821 NW 76 Lane Miami FL 33178
Felix Anderson	7543 SW 166 Ct Miami FL 33193	Dulce Galindo	5112 NW 116th Ct Doral FL 33178
Marcelo Ubal	10910 SW 72 Street Miami FL 33173	Diana Mantellini	5323 NW 106 Ct Doral FL 33178
Daniel Cabrera	5430 SW 96 Ave Miami FL 33165	Ana Diaz	11013 NW 43 lane Doral FL 33178
Maria Luisa De Jesus	10414 SW 227 Terrace Miami FL 33190	Bengt Seiplax	9942 NW 41st Street Doral FL 33178
Mario Fernandez	6205 SW 67th Ct South Miami FL 33143	Maria Florencia Calcena	9971 NW 51st Lane Doral FL 33178
Amado Peñate	7261 SW 152 Street Palmetto Bay FL 33157	<b>Brickell / Key Biscayne</b>	
<b>Coral Gables</b>		Gisela Cros	2025 Brickell Ave Apt 505 Miami FL 33129
Guillermo Fernandes	1650 Galiano St 17Th Coral Gables FL 33134	Alexandra Rumie	773 Glenridge Key Biscayne FL 33149
Gonzalo Ruiz	4675 SW 14th St Miami FL 33134	<b>North of Miami</b>	
Juan Pablo Peñaloza	1402 Columbus Blvd Coral Gables FL 33134	Jonathan Jones	7381 Royal Palm BLVD Margate FL 33063
		Henry De Valle	17945 SW 10th CT Pembroke Pines FL 33029

## Appendix I – Contents of Disaster Recovery Boxes

**Box Number:** **Insert Box Number**

**Description of Contents:** **List Contents Below; Example Follows**

<b>Item</b>	<b>Quantity</b>
Blank Trade Order Tickets	100
Box of Pens	1
Box of Pencils	1
Staplers	3
Box of Paper Clips	5
Note Pads	12
Calendar	2
White Out	5
Institutional Account Opening Documents	25
Personal Account Opening Documents	25
Corporate Blank Checks	25
Thumb Drive	5

## **Exhibit I – Business Continuity Plan – Clearing Firm**

A summary of the Clearing Firm's Business Continuity Plan follows:

### **Business Continuity Plan Summary**

COR Clearing LLC ("COR") has developed and maintains on file a Business Continuity Plan ("BCP") as it relates to FINRA Rules 3510 and 3520. In addition, COR has prepared and keeps on file an Information Systems Disaster Recovery Plan, a comprehensive and complex plan regarding technical recovery of COR data. The plans address recovery strategies, critical business processes, recovery teams, and recovery procedures. The Executive Vice President Operations or Chief Operations Officer have the authority to approve and execute the BCP.

COR maintains two business offices:

- The Operations Office ("Omaha office") is located at 9300 Underwood Avenue, Suite 400, Omaha NE 68114. Our main telephone number is 402-384-6100. All clearing operations functions are performed at this office.
- The Stock Loan Office is in New Jersey located at Metropark Corporate Campus, 379 Thornall Street, Edison, New Jersey 08837. Our main telephone number is 732-780-0261.

The Technology/DR Center is located at 1001 Fort Crook Road North, Bellevue NE. This location is our primary data center.

Our data backup center is located at 9300 Underwood Avenue, Suite 400, Omaha NE 68114. Our main telephone number is 402-384-6100.

COR performs clearing activities to introducing broker/dealers which include, but are not limited to, executing, clearing and settling securities transaction on behalf of the introducing firm, preparing and delivering confirmations of transactions and periodic account statements, extending credit (margin), performing cashiering functions such as receiving and delivering checks, funds and securities and collecting commission and other fees of introducing broker/dealers, safeguarding account funds and securities and maintaining books and records of the accounts. COR will disclose in writing a summary of our BCP to correspondents at the time an executed clearing agreement is received and when changes or updates are made to our plan.

It is COR's policy to respond to a Significant Business Disruption ("SBD") by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business.

COR's BCP anticipates several kinds of disaster recovery levels, including immediate, short-term and long term. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. The decision to formally declare a disaster will be made within four (4) hours



of an incident. A disaster will be declared if the disruption of computing services is expected to last beyond eight (8) hours. COR will notify their correspondents within four (4) hours of the incident if we declare a SBD.

### **Data Backup and Recovery (Hard Copy and Electronic)**

COR maintains its primary books and records in electronic records and hard-copy at 9300 Underwood Avenue, Suite 400, Omaha NE.

Our Chief Technology Officer is responsible for the maintenance and backup of the electronic records. COR utilizes the Grandfather, Father, and Son (“GFS”) system to ensure data integrity. Daily backups will occur at night that will copy mission critical data. These tapes will be stored daily in a fire-resistant safe located at the Omaha Office.

COR maintains an offsite storage facility located in Omaha NE for hard-copy documents. Documents are also stored on microfiche with a backup copy located at the storage facility. Any documentation not yet stored on microfiche, can be recreated with data provided by Thomson Beta Systems. Thomson Beta Systems is COR’s primary processing provider with significant technology backup and redundant processing facilities.

COR is responsible only for data backup for account information processed through COR. The correspondent is responsible for any data that the firm maintains for direct or application way business.

### **In the Event of a Significant Business Disaster Declared by COR:**

1. COR will assess which means of communication are still available to communicate with our correspondents and contact all correspondents of the issue(s) related to the significant business disaster.
2. If necessary, COR will move designated staff from the Omaha office to the backup location and basic business clearing operations will be established. COR will contact all correspondents via telephone, email or facsimile with instructions on continuing business operations.
3. In the event of a SBD that would no longer allow the Omaha office to function, COR will continue processing orders from the backup location in Omaha once personnel are on site. COR will continue to take orders through methods that are available and reliable. As the extent of the SBD is assessed, COR will inform our correspondents what alternatives they have to send their orders to us. Correspondents will be informed of alternatives by telephone, cellular telephone, email, or facsimile.
4. In the event of a SBD that would no longer allow the Omaha office or COR staff access to client funds, COR has made arrangements for clients to access funds invested in the Bank Sweep program through DB Advisors Liquidity Management Group. Contact information will be communicated to all correspondents at the appropriate time (refer to item #1).
5. COR will assess our financial situation and value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our credit sources to fulfill our

obligations to our correspondents. If COR cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately. These include the FINRA District 4 Office, the SEC Regional Office in Denver, and the FINRA Regulation and SEC Headquarters in Washington DC. COR will work with the FINRA District Office in Kansas City as our DEA to work toward resolving any capital issues. COR maintains a list of our regulators, critical business constituents and bank contacts.

**In the Event a Correspondent Declares a Significant Business Disaster:**

1. Notify COR as soon as possible in whatever means of communications are available to the correspondent. Contact information is as follows:

Brian Strasser, Vice President  
402-384-6180  
[Brian.Strasser@corclearing.com](mailto:Brian.Strasser@corclearing.com)

Customer Service  
800-811-3487 or 402-384-6101  
[customerservice@corclearing.com](mailto:customerservice@corclearing.com)

2. Describe the nature of the SBD and what business operations, if any, remain at the correspondent office.

3. Provide a list of critical contacts and how they can be reached at the correspondent firm or alternate location.

4. Outline the issue to the Customer Service Managers on what COR should tell the clients regarding the correspondent SBD.

\*Please note that COR Clearing will perform liquidation-only transactions, check requests and wire requests directly from customers with proper letters of authorization. COR will not accept purchase or buy orders. Due to limited staff available for direct client contact, general account inquiries such as stock or bonds quotes, balance inquiries, market information, etc. should not be directed to COR Customer Service.

COR will notify correspondents if there are any material changes in the plans.

## Exhibit II – Pandemic Preparedness Plan

### PANDEMIC PREPAREDNESS PLAN

#### Introduction

In the event of a biological threat or virus or influenza pandemic, businesses will have a key role to play in reducing the risk to employees' health and safety as well as maintaining essential operations. Following is the Firm's business continuity management plan to ensure that the impact of any disruptions due to a pandemic will be minimized. Timing of onset, rate of infection, and degree of impact on the Firm's business are highly unpredictable. Due to the unpredictable nature of these types of threats, this pandemic preparedness plan is flexible and should be reviewed at each stage of a pandemic and updated accordingly.

#### Current Threats

The Firm is monitoring the following threats:

- The H5N1 virus (avian influenza)

#### I. Pandemic Coordinator

Mr. Manuel del Cañal will serve as the Firm's Pandemic Coordinator (the "Coordinator"). All questions regarding this Pandemic Preparedness Plan should be directed to the Coordinator. The Coordinator is responsible for performing the following tasks:

- A. Pandemic Surveillance. Track biological threats. Resources may include:
  1. World Health Organization at <http://www.who.int/en/>.
  2. U.S. Pandemic Flu website at <http://www.pandemicflu.gov>.
  3. Center for Disease Control and Prevention at <http://www.pandemicflu.gov/>.
  4. Health advisory notices from the State health department at <http://www.doh.state.fl.us/>.
  5. Health advisory notices from local health department at <http://www.dadehealth.org/>.
  6. The CDC-Info Hotline at 800-CDC-INFO (800-232-4636) (24 hours a day, 7 days a week)
- B. Key Business Contacts. Maintain contact with the following key businesses to assess their crisis response capabilities and the impact, if any, the pandemic may have on the continuing business relationship:
  1. Cor Clearing
  2. Bloomberg
  3. Ocean Bank
  4. FINRA – Boca Raton District Office
- C. Inform Shareholders. Report to shareholders new threats or alerts. Maintain on a current basis a list of countries to which travel should be restricted and update staff accordingly.
- D. Update Plan. Regularly update this Pandemic Preparedness Plan in response to new information and at each stage of the pandemic.

#### II. Pandemic Preparedness Assumptions

- Rate of infection: 25-30%
- Absenteeism: 50% or more

- Mortality rate: 5-10% of those who become ill
- Virus will travel the globe quickly
- Pandemic will occur in several “waves” of infection
- Total pandemic event may last for 18 months

### **III. Response Plan**

A. Stage 1. Outbreak outside of U.S. The public health threat of a pandemic greatly increases when the virus gains the ability to spread from one human to another. When person-to-person transmission continuing beyond one person is reported, the Firm will take the following steps:

1. Monitor the WHO and CDC Web sites for travel advisories. In the event the WHO or CDC recommends travel to certain countries be restricted, restrict business travel to such countries and advise personnel against non-essential travel to those countries. Require personnel who return from such countries to stay home for the number of days required to ensure that the person is not contagious if he/she had contracted the virus.
2. Regularly review situation updates and cumulative reports on human infections. Such reports can be found on the WHO Web site.
3. Ensure that there are a sufficient number of laptops for key personnel (either personal or firm-issued). Ensure that laptops for key personnel have the appropriate network hardware and required software for remote access to files, emails, and the intranet, as appropriate.
4. Ensure that key personnel have broadband access at home.
5. Evaluate network capacity and technological infrastructure challenges.
6. Test remote access capabilities by key personnel operating from home.
7. Modify “just-in-time” inventory policies for essential supplies and address office product supply issues for number of employees anticipated to work from home.
8. Purchase supply of anti-bacterial hand sanitizing products for office personnel.
9. Understand national and local governments’ policies and the potential impact they may have on the Firm’s business operations and emergency plans, such as border closures.
10. Prepare employee awareness program to educate staff and prevent panic. Pre-draft pandemic-related communications for release to personnel at Stage 2 and Stage 3 of pandemic.

B. Stage 2. Outbreak in U.S.

1. Advise against non-essential travel to affected regions.
2. Monitor the status of pandemic as reported through the WHO.
3. Establish or revise, as appropriate, policies for sick-leave absences unique to a pandemic.
4. Establish or revise, as appropriate, telecommuting policies.
5. Develop platforms (e.g. hotline or dedicated Web site) for communicating pandemic status and actions to employees, vendors, suppliers, and customers.
6. Provide sufficient and accessible means for reducing spread of infection (e.g. hand-washing facilities and anti-bacterial hand sanitizing products).
7. Educate staff.
8. Identify minimum required on-site office population.
9. Ensure staffing plans have sufficient redundancy to allow for anticipated absenteeism, and cross-train employees to fill essential vacancies that might occur.
10. Identify business functions that could be outsourced or transferred to other facilities within the organization in the event of high employee absenteeism.
11. Ramp up work from home capacity/capability to accommodate the need for social distancing. Forecast and plan for employee absences as a result of a number of factors including personal illness, family member illness, bereavement, and possible disruption to other sectors such as day care and school closures and reduced public transport.
12. Consider purchasing respiratory masks. If respiratory masks are not available, purchase standard surgical masks in sufficient quantities for all on-site office personnel.

13. Purchase additional cleaning supplies.
14. Ask persons exhibiting fever and respiratory symptoms to undergo voluntary home confinement.

C. Stage 3. Outbreak in Florida.

1. Establish and clearly communicate policies on sick leave, family leave, and employee compensation.
2. Review telecommuting policies with all personnel.
3. Establish system to account for employee status (e.g. dial-in system).
4. Monitor border closures, airport closures, school closures, and transportation closures.
5. Review and analyze labor laws that determine your obligations to personnel.
6. Inform key business contacts and customers of any changes to service capabilities and contact information for key personnel, as appropriate.
7. Review succession plans for key personnel and revise as appropriate. Disseminate the succession plans to employees.
8. Promote respiratory hygiene and etiquette (encourage staff to cover mouth when coughing or sneezing and carefully dispose of soiled tissues or other materials). Provide staff with respiratory or surgical masks, which may be worn. Masks should be well-fitting.
9. Repeatedly remind staff of the need for frequent hand washing with soap and water.
10. Disinfect worksite thoroughly and frequently.
11. Advise employees who are ill with flu-like symptoms to stay home from work.
12. Implement additional procedures as necessary (e.g. medical screening for employees returning to work).
13. Remind employees that normal supply lines may be slowed or inoperable for an extended period of time and to make personal preparations for pandemic for up to 12 weeks (e.g., stockpiling food, water, and prescription drugs).