

# **Business Continuity Plan**

## **Business & Organizational Chart**

Boursa Investments (BRSA) is a fully disclosed broker-dealer registered in the state of California, Minnesota, Nevada & Washington. It clears all trades through Wedbush Securities. The clearing firm holds all customer positions (cash & securities), provide trading services, trade confirmations & statements for all of BRSA's clients. Presently, the Company has seven Registered Representatives. Jose Mondragon, Juan Mondragon, James Castaneda, Constanza Freyer, Margarita Valenzuela, Alejandra Bache, and Gerardo Bache are registered reps, principals & officers of the firm respectively. Boursa has only one Office of Supervisory Jurisdiction (OSJ) registered in San Diego, California located 690 Otay Lakes Road, Suite 275, Chula Vista CA 91910, San Diego County. Constanza Freyer, one of the firm's registered principal, and assistance compliance officer is located in Cordoba, Argentina branch.

## **Identifying Possible Problem Systems**

All possible problem areas have been identified & below areas have been considered mission critical systems.

The possible problem areas were selected based on the definition of mission critical systems & other information provided by FINRA Rule 4370. All computer based systems used in the regular course of business were considered. Other than the computers used in the office, that will be networked, all of our services will be provided by third party vendors.

The purpose of this plan is to avoid any possible business disruption in case of an emergency & to ensure that BRSA's obligations to customers will be met even in the midst of an emergency or disaster affecting the Company's office or any of their service providers.

## ***Contingency Plans***

**Telephones** Because this is the primary way of communication between the Company's registered persons (Principals & RRs) & their clients, the Principals of BRSA will make available to all the RRs their cellular phone numbers, as well as listing contact numbers for all Principals & key staff of the Company. These contact people will be able to enter orders if the Principals in the San Diego office cannot be contacted due to a disaster. Additionally, Boursa's personnel may be contacted through its website under the menu tab "Contact Us."

The Designated Contact person is Jose Mondragon, but alternate contacts will be offered to registered persons & clients of BRSA directly and/or on the BRSA website. All Registered Representatives will know how to contact each other as well as all Principals of BRSA. Clients will be able to contact the San Diego office, but also have the name of a Principal or RR in their geographical area. Therefore, if there is any problem in contacting the San Diego office, clients will be able to contact their Registered Representative or a Principal at an alternate location. The RRs will then contact a Principal to input buy & sell orders. The names of these people can be found on the Emergency Contact list.

**Internet** AT&T provides BRSA's internet service.

Although the Company will have the capability to communicate with its clients through the internet (e-mail or website). All of the clients who contact BRSA this way also have the telephone numbers discussed above. Online communication with clients, is used exclusively for none urgent matters such as requests for information & general questions. The same is true for communication between BRSA's employees & registered persons. Boursa relies heavily on the internet to obtain real-time market information via Thomson's Eikon, Thomson One, Quodd, and to enter all customer trades onto Wedbush Securities web-based trading system, Broker Insight & BETA. Another system Thomson REDI, may be used but just as an alternate platform. If AT&T internet service fails, the Company would be unable to conduct this business in its usual manner. However, it may continue partial or full service through Rep's mobile devices (provided by Verizon). In the event of a total internet failure, all orders will be entered by calling Wedbush Securities trading desks by telephone. The Principals in San Diego will make these calls & continue to enter orders in this way until the internet connection is re-established. If the internet failure is expected to last for an extended period of time the Executive Representative, Jose Mondragon, will assign a Principal at an alternate location to be the designated contact person to accept & input customer orders using different internet server. In this case, Jose Mondragon would ensure that all Registered Reps are notified of the alternate plan & a notice will be posted on the company's web-site under the "Emergency Contacts" heading.

**Electricity** In case the San Diego office loses power, flashlights & batteries are available in the office at all times. The firm understands that the lack of electricity will affect their ability to have real-time quotes & their access to the office computer systems. BRSA will be able to call Wedbush Securities' trading desk to ask for quotes & any incoming information will be taken down by hand & entered into the computer at a later date when power is again available. Orders will be given by telephone to the Wedbush Securities trading desk.

**Natural Disaster / Intentional Attack / Pandemic** In case of a natural disaster (such as earthquake, flooding, fire, and any other event), intentional attack (lethal / non-lethal), and/or a Pandemic (including health related issues affecting business as usual) Boursas' customers will be able to contact their Rep / any person listed on the Emergency contact list / Wedbush directly to obtain information on their accounts or request a transaction. Its current and only OSJ location is at 690 Otay Lakes Road, Suite 275, Chula Vista CA 91910, San Diego County. If an alternate location is selected because of business disruption, main office telephone lines will be redirected to the correspondent principal(s), supervisor(s). Customers will be notified by email or by phone directly. Additional information may be posted at BRSA's website with instructions.

**Wedbush Securities** Provides clearing services to BRSA.

BRSA pays close attention to Wedbush Securities' internal trading systems, their Emergency Preparedness plans & their communications networks. Wedbush Securities is confident that they are among the most reliable & are able to make available a large number of options in case of a disaster. In their 2019 Business Continuity Plan, they designated a primary alternate location in San Diego and a Secondary Alternate Location in Arizona. In case both of these fail to operate, BRSA is able to contact them at other locations (Los Angeles, San Francisco, Denver, Honolulu & New York). In the event of a problem with the on-line order entry system or the main trading desk phone lines, customer orders could be processed at any of these locations. The Company is confident that in the event of a localized disaster, Wedbush Securities will be available to fill any customer trades on any open US markets. Additionally, we feel that there are enough contact numbers around the country for Wedbush Securities that unless a nation-wide disaster occurs, BRSA would be able to contact them & assist with customers' trading needs.

With regard to business disruption related to health issues or pandemic. Wedbush will notify us and all correspondent firms by email. The communication will have instructions and information that will be directed to BRSA's CCO, and current President, CEO. Wedbush has in place redundant systems, and procedures that will allow business as usual with little or no interruption in order entry and back office processing.

In the case that Wedbush is unable to trade, the company will transfer securities or cash to another location and/or clearing firm in the time necessary for a normal settlement. This includes if there is the problem of cash deposit requirements & the time required to setup all the client accounts & getting all relevant client documentation signed & turned in to the alternate clearing broker.

<https://www.wedbush.com/disclosures/>

**Financial & Credit Risk** In the event of an SBD, we will determine the value & liquidity of our investments & other assets to evaluate our ability to continue to fund our operations & remain in capital compliance. We will contact our clearing firm, critical banks, & investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request financing from our bank or other credit sources to fulfill our obligations to our customers & clients. If we cannot remedy a capital deficiency, we will file appropriate notices with regulators.

**FINRA & Other Regulators** In case of an emergency, communication with regulators will be handled via telephone or e-mail depending on the systems availability. If an emergency affects all systems in the San Diego office, FINRA & other Regulators will be notified by a Principal at an alternate location (Argentina branch) or any other alternate location selected temporarily (private residence or alternate office). Once the initial notification has taken place & an analysis of damage is conducted, BRSA will provide regulators with the necessary information to maintain lines of communication open. A Principal at an alternate location may be designated as a company/regulator liaison or alternate emergency contact numbers may be provided.

BRSA has informed FINRA that Jose Mondragon, Juan Mondragon, James Castaneda, Gerardo Bache, and Constanza Freyer, are the Designated Emergency Contact Persons. Additionally, a copy of this Business Continuity Plan will be stored on the Office 365 cloud.

**Computers** BRSA uses laptop computers that are networked, but do not store client information & create faxes, letters & customer documents (NAFs, Customer Agreements, etc.). All of the client positions & cash will be held & accounted for at Wedbush Securities. Although the information stored on the company computer systems is not mission critical & its loss would not significantly affect the clients, BRSA backs-up daily activity on our Office 365 Cloud & Microsoft Exchange Online.

The computers are used to input customer orders into the Wedbush Securities trading system. If the office computer network becomes inoperative due to an emergency, trades could be entered as an exception by any of the firm's Principals that are not located in San Diego OSJ. If their computer systems were also affected or if they could not be contacted, orders could be called into the Wedbush Securities trading desks as described above.

**Bank** BRSA has its only bank account, checking account, at Wells Fargo Bank in San Diego. The Company has check writing capabilities for the account & can access their account information on-line. In the case of an emergency affecting the company's ability reach their on-line checking account information balances can be consulted by the Principals via telephone directly with Wells Fargo Customer Service. Additionally, in-house balances & transaction records will be kept current in the San Diego office. BRSA will also have a deposit account & a trading account at Wedbush Securities & will be able to have money wire transferred or sent by check from one of these accounts. These checks would be drawn from one of Wedbush Securities' banks & not Wells Fargo Bank.

All customer money will be kept at Wedbush Securities, so any problems with BRSA's banking services at Wells Fargo would not affect the clients.

**Post Office** In the event that the post office is unable to take & deliver mail in a timely fashion, BRSA will send important documents, correspondence & payments via overnight delivery services or by email. Additionally, if the mail in this country becomes compromised by a disaster or an emergency, the Company's registered person in Cordoba, Argentina may send important mail directly from there.

## **BOOKS & RECORDS/INFORMATION STORAGE**

All information is backed up on our Office 365 Cloud and Microsoft Exchange Online. Client information is backed up with our clearing firm Wedbush Securities.

**Client Non-Public Information/NAFs & Account Documentation** The signed paperwork for all accounts will be filed in BRSA's office in San Diego and personal information is backed up by Wedbush Securities. These documents will include Wedbush Securities' Account Agreements, Joint Tenant Agreements, W8/W9 Forms, Margin Agreements, Options Agreements, Third Party Trading Authorization, etc...

**Internal Correspondence** The majority of written correspondence between BRSA & its Principals, & Registered Reps will be conducted by e-mail. As stated earlier, all of the e-mails produced in the office of BRSA will be typed on the computer network and stored with Microsoft Exchange Online. Email is to be accessed and supervised by the assistant compliance officer Constanza Freyer. If any communication between the firm & any of its registered persons is sent in hard copy, the original document will be produced on the office computers & again backed-up. A copy of the letter will be stored in the appropriate file in the San Diego office. It would be unusual for a registered or associated person not located in San Diego office to send a letter via mail or other delivery service to San Diego.

**Correspondence to Customers** Communication to customers sent from BRSA will be done primarily by e-mail, but on occasion may be conducted via mail. All account statements, confirmations & other

account related information will be sent to the clients via mail, email notices or will have direct access from their Clientlink online account access provided by Wedbush Securities. Wedbush Securities will keep copies of all these required communications on their computer systems where they will be accessible to the firm, its registered persons & the clients who will have internet access to their accounts.

If a letter is sent by a registered person of BRSA to any of the firm's current or prospective customers by regular mail a copy is kept by the RR who sent it & a copy is sent to the Principals in San Diego for the Correspondence Folder or the client records. This system allows for the correspondence to be stored at two diverse geographical locations. In most cases, however, letters to customers would be sent by the Principals in the San Diego office. In this case the document would be produced from the computer, which will be backed-up in the appropriate folder. As stated above, these back-ups will be kept in the San Diego office.

**Correspondence from Customers** When a communication is received from a customer via e-mail, the communication will be filed in Microsoft Exchange Online. Daily back-ups of all material on the office computers will be stored with Microsoft Exchange Online.

However, as stated earlier the majority of customers choose to communicate with BRSA via e-mail and phone or rarely by fax. Communications sent to the firm by clients would likely consist of information such as change of address, request for wire transfer or information regarding a deposit, Death Certificates or complaints. These will all be filed in the customer files or in the appropriate folder within the office of BRSA. Any of the communications that require an action on the Company's part, such as a change of address, an outgoing wire transfers or a Death Certificate will be acted upon immediately & the necessary changes will be entered in the Wedbush Securities system. In certain instances the clearing firm may require that BRSA fax them the LOA. When this is required, Wedbush Securities retains a copy in their records serving in effect as a data back-up of customer communications in a separate geographical location. Although the Principals of BRSA are currently investigating different back-up options, a record exists of the transactions made on the Wedbush Securities system.

Most communications that do not require any action to be taken on the Wedbush Securities system received by mail or fax in the San Diego office, do however require the attention of a customer communications might be lost, the responses or actions taken would remain in the back-up files. As all responses to customer communications will be made by a principal of BRSA, the responses will be typed on the office computers; these responses will be stored on Microsoft Exchange Online.

**Supervisory Procedures & Manuals** All supervisory manuals will be kept on the firm's computer systems & will be backed-up on our Microsoft Online Exchange and through our vendor Wolters Kluwer's online access. Additionally, because BRSA will make these manuals available at least annually to its registered persons, each of them must have a copy on their computers.

**Financial Statements** All financials will be prepared on BRSA's computer. As stated above all files will be backed-up daily on our Office 365 cloud and computer. Another source of back-up of the Company's financials is a USB drive and the focus reports that will be filed monthly with FINRA.

This plan will be updated as soon as there are any changes to the material information contained herein or to the FINRA Rules related to Business Continuity & Emergency Preparedness. At a minimum this plan will be reviewed annually & updated as necessary to allow for business continuity in the event of an emergency or disaster.

## **POSSIBLE EMERGENCY PROBLEM AREAS**

**\*\*\* Phones**

Local & Long Distance, VOIP (NEXTIVA)

Cellular (Verizon)

**\*\*\* Internet Connection**

AT&T

**\*\*\*Electricity (SDG&E)**

**\*\*\* Natural Disaster / Intentional Attack / Pandemic**

**\*\*\*Wedbush Securities**

Operations

Communications

**\*\*\* Accounting (In house FinOp)**

Bank (Wells Fargo)

Post Office

**\*\*\* MISSION CRITICAL SYSTEMS**

## EMERGENCY CONTACTS

Dear Client,

If you are unable to contact the office of Boursa Investments as a result of an emergency or disaster, please contact your local Registered Representative. If you are unable to locate them, please feel free to contact any of the following people as emergency contacts.

Boursa Investments

Phone: (619) 756-6949 Fax: (619) 756-6952

Email

[ContactUs@boursaia.com](mailto:ContactUs@boursaia.com)

### **Designated Emergency Contact:**

Jose Mondragon (CEO)

Phone: (619) 954-7140

Email

[jmondragon@boursaia.com](mailto:jmondragon@boursaia.com)

### **Alternate Emergency Contacts:**

Juan T Mondragon (COO)

Phone: (619) 454-1726

Email

[jtmondragon@boursaia.com](mailto:jtmondragon@boursaia.com)

James Castaneda (FINOP)

Phone: (619) 952-2433

Email

[jcastaneda@boursaia.com](mailto:jcastaneda@boursaia.com)

Gerardo Baché (CCO)

Phone: (619) 852-0396

Email

[gbache@boursaia.com](mailto:gbache@boursaia.com)

Constanza Freyer (Assistant CO)

Phone: 011-54-9-351-398-8091

Email

[cfreyer@boursaia.com](mailto:cfreyer@boursaia.com)

*Cordoba Argentina*

In the case of Severe Business Disruption and you are unable to contact any of the above contacts and need to access your account our clearing agent contact info is listed below.

Wedbush Securities

Phone: (213) 688-8000

The above names will be updated in the event of any material change.