

# **TradePro Securities, Inc.**

## **Business Continuity Plan (BCP)**

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### **I. Emergency Contact Persons**

The firm will provide FINRA with the contact information for the two emergency contact persons: (1) name; (2) title; (3) mailing address; (4) email address; (5) telephone number; and (6) facsimile number through the FINRA Contact System (FCS). The chief Compliance Officer will promptly notify FINRA of any change in this information through FCS (but no later than 30 days following the change) and will review, and if necessary update, this information within 17 business days after the end of each calendar year.

*Rule: FINRA Rule 4370(f); NASD Rule 1160.*

### **II. Firm Policy**

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

#### **A. Significant Business Disruptions (SBDs)**

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

#### **B. Approval and Execution Authority**

Claudette Gay, CCOAMLO, a registered principal, is responsible for approving the plan and for conducting the required annual review and has the authority to execute this BCP.

#### **C. Plan Location and Access**

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on the firm's server and in an off-site location.

*Rule: FINRA Rule 4370(b), (d) and (e).*

### **III. Business Description**

Our firm conducts a full-service business including equity, fixed income, non-proprietary mutual funds, variable annuities and private placements. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services retail and institutional customers.

**In the Event the Firm experience a Significant Business Disaster:**

1. Notify the appropriate clearing firm that is carrying your account as soon as possible in whatever means of communications are available to the correspondent. Contact information is as follows:

Velox Clearing. Client Services

866-808-3569

[clientservices@velox-globalclearing.com](mailto:clientservices@velox-globalclearing.com)

RQD Clearing

212 686 8650

[info@rqdclearing.com](mailto:info@rqdclearing.com)

Velocity Clearing

888 604 0156

[sales@velocityclearing.com](mailto:sales@velocityclearing.com)

**IV. Office Locations**

*List the locations of all of your offices, registered and unregistered, and state the means of transportation that employees may use to reach that facility. State also which mission critical systems, as defined below, take place at each office location.*

**A. Office Location**

Our Location at:

340 Congress Parkway

Lawrenceville, Ga 30044

Main: 305-446-4800, alt 404-263-4632

Our employees may travel to that office by means of foot, car, subway, train, bus, boat, or plane. We engage in order taking and entry at location A.

**V. Alternative Physical Location(s) of Employees**

In the event of an SBD, we will move our staff from affected office(s) to the closest of our unaffected office location(s). If none of our other office locations is available to receive those staff, we will move them to the home of our CCO/AMLO located at 340 Congress Parkway, Lawrenceville, GA 30044.

Rule: *FINRA Rule 4370(c)(6).*

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

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, Velox Clearing, LLC. In the event of an internal or external SBD, if telephone and/or cell service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf. If our Web access is available, our firm will post on our website that customers may access their funds and securities by contacting us at (305) 446-4800 or 404 263-4632. The firm will make this information available to customers through its disclosure policy.

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

Rules: *FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; see also 15 U.S.C. § 78eee.*

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

Our firm maintains its primary hard copy books and records and its electronic records at 3009 del Monico Dr., Decatur, GA 30032, as well as in a secure cloud. The FINOP, and the Chief Compliance Officer (CCO), are responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm:

- Email Correspondence
- Financial and Bank records
- Payroll and Tax information
- Regulatory Reports and Filings
- Private Placement Memorandums
- Subscription Agreements
- Customer Account Records
- Employment Files

Our firm maintains its back-up hard copy books and records at the main office in a fire proof cabinet. These records are paper copies or electronically filed. The CCO and the FINOP are responsible for the maintenance of these back-up books and records. Our firm backs up its records electronically on a daily basis off-site and maintains hard copies in fire proof cabinets.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Rule: FINRA Rule 4370(c)(1).

## **VIII. Financial and Operational Assessments**

### **A. Operational Risk**

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our telephone voice mail and email. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

Rules: FINRA Rules 4370(c)(3), (c)(4), (c)(5), (c)(7), (c) (9 & (g)(2)).

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

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

Rules: FINRA Rules 4370(c)(3), (c)(8) & (g)(2).

## **IX. Mission Critical Systems**

Our 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.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, entry, and execution. Our clearing firms provide, through contract, the execution, comparison, allocation, clearance and settlement of securities and futures transactions, 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 have presented us with their respective summary (SOC1) of its plan, which is available upon request. In the event our clearing firms execute its plan, it represents that it will notify us of such execution and will provide our firm 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 firms represent that it backs up our records at a remote or out of region site. Our clearing firms represent 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 firms have also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

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. Our clearing firms have the following SBD recovery time and resumption objectives: recovery time period of 4 hours.

The CCO and/or the FINOP will periodically review our clearing firm’s capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

## A. Our Firm’s Mission Critical Systems

### **1. Order Taking**

Currently, our firm receives orders from customers via telephone, fax and email. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, 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 phone, email or website. If necessary, we will advise our customers to place orders directly with our clearing firm.

### **2. Order Entry**

Currently, our firm enters orders by recording them on paper and electronically and sending them to our clearing firm electronically or telephonically.

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, email and fax. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

### **3. Order Execution**

We currently execute orders through our clearing firm’s system. In the event of an internal SBD, we would contact the respective clearing firm directly. In the event of an external SBD, we would use any alternative means available to contact the clearing firm.

## B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firms to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

*Rules: FINRA Rules 3510(c)(2) & (g)(1).*

## X. Alternate Communications Between the Firm and Customers, Employees, and Regulators

## A. Customers

We now communicate with our customers using the telephone, email, fax, U.S. mail and in-person visits at our firm or another location. In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

*Rule: FINRA Rule 4370(c)(4).*

## B. Employees

We now communicate with our employees using telephone, email, and in person. In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers.

*Rule: FINRA Rule 4370(c)(5).*

## C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by: FINRA, SEC, and all 50 states. We communicate with our regulators using telephone, email, fax, U.S. mail, in person, etc. 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.

Currently, the contact information for FINRA, and the SEC:

Financial Industry Regulatory Authority  
Elena Domica, (RMA) Risk Monitoring Analyst  
581 Main Street, Suite 710  
Woodbridge, NJ 07095  
(732) 596-2000  
Fax: (732) 596-2001

SEC Atlanta Regional Office  
950 E Paces Ferry RD NE  
Ste 900,  
Atlanta, GA 30326

*Rule: FINRA Rule 4370(c)(9).*

# XI. Critical Business Constituents, Banks, and Counter-Parties

## A. Business constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

*Rules: FINRA Rule 4370(c)(7).*

## **B. Banks**

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: Wells Fargo, 2555 Ponce De Leon, Coral Gables, Florida 33134, Phone #: 305-569-1924.

*Rules: FINRA Rule 4370(c)(7).*

## **C. Counter-Parties**

We have contacted our critical counterparties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible. Our major suppliers are Bloomberg, Thompson Reuters, Comcast, and Georgia Power, The Geek Squad and PC 911 (computer technicians), and Wells Fargo Bank.

*Rules: FINRA Rule 4370(c)(7).*

## **XII. Regulatory Reporting**

Our firm is subject to regulation by: FINRA, SEC, and the states of AZ, CA, CO, FL, GA, KY, MA, MI, NJ, NY and VA. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, email and the Internet. In the event of an SBD, we will check with the SEC, FINRA and other regulators to determine which means of filing are still available to us and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

*Rule: FINRA Rule 4370(c)(8).*

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

Our full written BCP disclosure statement is provided to customers during the account opening process and mailed to customers upon request.

*Rule: FINRA Rule 4370(e).*

## **XIV. Updates and Annual Review**

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

Rule: *FINRA Rule 4370(b).*