

# **Business Continuity Plan**

### **Business**

Boursa Investments, Inc. DBA as Boursa Investments (being the same company, BRSA or Boursa used as abbreviation for reference and/or for administration purposes) is a fully disclosed broker-dealer headquartered in San Diego, CA. It clears all trades through Wedbush Securities, Inc. The clearing firm holds all customer positions (cash & securities), provide trading services, trade confirmations & statements for all BRSA's clients. BRSA's Office of Supervisory Jurisdiction (OSJ) open to the public in the United States, is located at 690 Otay Lakes Road, Suite 275, Chula Vista CA 91910, San Diego County.

### **Possible Problem Areas**

All possible problem areas were identified and 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 our services are provided by third party vendors.

The purpose of this plan is to avoid any possible business disruption in case of emergency to ensure that BRSA's obligations to customers will be met even amid an emergency or disaster affecting the company's office or any of its service providers due to a Natural Disaster / Intentional Attack / Pandemic or any other event that may cause a possible interruption

## **Contingency Plans**

**Telephones** Because this is the primary way of communication between the company's registered persons (Principals & RR's) & 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 an emergency or disaster. Additionally, BRSA's personnel may be contacted through its website under the menu tab "Contact Us."

The Designated Contact person is the CEO of the company, but alternate contacts will be offered to registered persons, clearing firm, and 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 financial professional or a Principal at an alternate location. The RRs will then contact a Principal to input buy & sell orders.



#### Internet

Although the company and its representatives have the capability to communicate with its clients through the internet (e-mail or website). All clients who contact BRSA this way, also have the telephone numbers discussed above. Online communication with clients, is used exclusively for nonurgent 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 and to enter all customer trades onto Wedbush Securities web-based trading system. If 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. In the event of a total internet failure, all orders will be entered by calling Wedbush Securities trading desks. The Principals in San Diego will make these calls & continue to enter orders in this way until the internet connection is reestablished. If the internet failure is expected to last for an extended period, the Executive Representative 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, the CEO or the COO would ensure that all Registered Reps are notified of the alternate plan & a notice will be posted on the company's website under the "Emergency Contacts" heading.

**Electricity** In case the San Diego office loses power, flashlights & batteries are always available in the office. 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 that may cause business disruption), intentional attack (lethal / non-lethal), and/or a Pandemic (including health related issues affecting business as usual) BRSA's clients will be able to contact their Rep, the office directly as telephone lines would be forwarded to individual mobile devices, and/or Wedbush directly to obtain information on their accounts or request a transaction. Its current and only OSJ location in the US for client servicing is in San Diego, CA. If an alternate location is selected because of business disruption, main office telephone lines will be redirected to the correspondent principal(s), supervisor(s). Clients 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 & can make available many options in case of a business disruption. They have designated a primary and secondary alternate location in different states within the US. In case both fail to operate, BRSA will be able to contact them through their website or at other locations in the US. The



Company is confident that in the event of a localized disaster and/or emergency, 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.

In the event of a 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 CEO, COO and CCO. 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. This notification will be posted on their website and additional information may be found directly at 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 regulators, 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 counterparties 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 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 its regulators the Designated Emergency Contact Persons. Additionally, a copy of this Business Continuity Plan will be stored on the cloud.

**Computers** BRSA uses computers that are networked and secured. All clients 'positions & cash are held & accounted for at Wedbush Securities, Inc. Although the information stored on the company computer systems is not mission critical & its loss would not significantly affect the clients, BRSA backs-up trading activity on the cloud.



**Boursa Investments** 

The computers are used to input customer orders into the Wedbush Securities, Inc. trading systems. If the office computer network becomes inoperative due to an emergency or natural disaster, trades could be entered as an exception by Registered Representative (s) not located in San Diego OSJ. If their computer systems were also affected or if they could not be contacted, orders could be processed through Wedbush Securities trading desks as described above.

**Financial Accounts.** The Company has check writing capabilities for its bank account & can access account information on-line. In the case of an emergency affecting the company's ability to reach their on-line bank account information balances can be consulted by the designated principal via telephone directly with the bank's Customer Service. Additionally, in-house balances & transaction records will be kept current in the San Diego office. Brokerage accounts to be maintained with clearing firm. Any business disruption or negative event, BRSA will contact the appropriate parties.

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

**Post Office** If 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 appointed Principal may send important mail electronically upon client notification.

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

Hard copy client information is kept in our San Diego office. A digital back up is stored with our clearing Firm Wedbush securities. If loss of digital or physical inventory may occur, client information may be recovered through one or the other. All client information is securely stored and locked. Daily trading activity is backed up on the Cloud and received by Wedbush electronically.

**Client Non-Public Information/NAFs & Account Documentation** The signed paperwork for all accounts will be filed in BRSA's office in San Diego, CA and personal information is backed up by Wedbush Securities.

**Internal Correspondence** Most of written correspondence between BRSA & its Principals & Registered Reps will be conducted by e-mail. 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 & backed-up. A copy of the letter will be stored in the appropriate file in the San Diego office. In the event of business disruption where a remote, alternate location has been designated, all correspondence must be forwarded to the San Diego, CA office or as directed by the CEO, COO and/or CCO.



**Correspondence to Customers** Communication to customers sent from BRSA will be done primarily by e-mail, but on occasion may be conducted via regular mail. All account statements, confirmations & other account related information will be sent to the clients via US mail, email notices or will have direct access from their 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.

**Correspondence from Customers** When a communication is received from a customer via e-mail, the communication will be filed and backed-up. BRSA clients communicate with its Financial Professionals via e-mail and phone or rarely by fax. Electronic communications between clients and BRSA personnel is stored online. Additional documents may be printed and physically stored in the appropriate file.

**Supervisory Procedures & Manuals** All supervisory manuals will be kept on the firm's computer systems & the new version will be backed-up on the cloud. Drafts and publish versions through our third-party provider. Additionally, because BRSA will make these manuals available at least annually to its registered persons, each of them will have a copy on their computers or the latest version will be available on the cloud.

**Financial Statements** All financials are prepared, printed, backed-up as required. Periodic reports are filed with our regulators. Financial assessment is conducted as indicated by net capital requirements for broker dealers on a daily, monthly and annual basis.

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, disaster, and/or any event that may cause business disruption.



# **POSSIBLE EMERGENCY PROBLEM AREAS**

\*\*\* Phones

\*\*\* Internet Connection

\*\*\*Electricity

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

\*\*\*Wedbush Securities Operations Communications

\*\*\* Accounting (In house FinOp) Bank Post Office

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

# IN CASE OF EMERGENCY

Dear Client,

If you are unable to contact your financial professional at Boursa Investments because of an emergency, disaster, and/or any event causing a business disruption, please contact our office directly as our phone will be forwarded to the appropriate personnel to handle day to day operations.

Boursa Investments	Phone:	(619) 756-6949	
	Fax:	(619) 756-6952	
Email	ContactUs	ContactUs@boursaia.com	

In the case of Severe Business Disruption and you are unable to contact any representative at Boursa Investments, you may contact our clearing agent below

Wedbush Securities, Inc.

Phone: (213) 688-8000