

# **CEA ATLANTIC ADVISORS, LLC**

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

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

Our firm's two emergency contact persons are Ming Jung, (813) 226-8844, [mjung@ceaworldwide.com](mailto:mjung@ceaworldwide.com) and Brad Gordon, (813) 226-8844, [bgordon@ceaworldwide.com](mailto:bgordon@ceaworldwide.com). These names will be updated in the event of a material change and our Executive Representative will review them 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, and protecting all of the firm's books and records.

#### **A. Significant Business Disruptions**

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.

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

Ming Jung, the designated principal, is responsible for approving the plan and for conducting the required annual review. J. Patrick Michaels, Jr., has the authority to execute this BCP.

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

Our firm will maintain copies of its BCP plan, the annual reviews and the changes that have been made to it for inspection. An electronic copy of our plan is located on cloud file server [ts.ceaww.com](http://ts.ceaww.com) in the Y2016/CEA Atlantic Advisors/Year End Compliance/Business Continuity Plan.doc.

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

### **III. Business Description**

Our firm conducts business in investment banking, mergers and acquisitions (“M & A”). Our firm is a M&A firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities.

### **IV. Office Locations**

Our office is located at 101 E. Kennedy Blvd., Suite 3300, Tampa, Florida 33602. Its main telephone number is (813) 226-8844. Our employees may travel to this office by means of foot, car or bus.

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

In the event of an SBD, Microsoft Cloud is available so that any employee from any location with an internet connection can access our system.

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

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

Our firm does not maintain or have custody of customers’ funds or securities.

*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 101 E. Kennedy Blvd., Suite 3300, Tampa, Florida 33602. Brad Gordon, CFO [(813) 226-8844], is responsible for the maintenance of these books and records.

The firm backs up its electronic records daily and keeps a copy at an undisclosed cyber center. The cyber center is operated by a national firm and has many secure features to ensure the protection of the CEA Atlantic Advisors, LLC’s electronic records.

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 electronic records. If our primary site is inoperable, we will continue operations from an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from electronic back-up, or, if our primary site is inoperable, continue operations from 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 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 website, [www.ceaatlanticadvisors.com](http://www.ceaatlanticadvisors.com), voice mail system at (813) 226-8844 and secure e-mail addresses. 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 critical banks and principals 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 principals to fulfill our obligations to our clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps to notify FINRA & the SEC.

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 our accounting system, telephone system and e-mail service.

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 our account records, voice mail system and e-mail system.

## A. Our Firm’s Mission Critical Systems

### 1. Accounting Systems

Currently, our firm processes invoices and payroll on a bi-monthly bases. During an SBD, either internal or external, we will continue to process invoices through any methods that are available and reliable, and in addition, as communications permit, we will inform our vendors when alternative communications become available to tell them.

### 2. Telephone System

Currently, a third party vendor, the local telephone provider, maintains our firm telephone system.

In the event of an internal SBD, we will contact the third party provider and request replacement equipment as soon as required. In the event of an external SBD, we will maintain the telephone system by best means available until operations resume.

### 3. E-mail System

We currently provide e-mail via of Microsoft Cloud file server located at Microsoft cyber center. In the event of an external SBD, we would assess the reliability of the Internet connections and plan for the best available resources to secure an Internet connection.

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

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

### A. Customers

We do not hold or maintain any customer accounts therefore no action plan is required at this time.

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

## B. Employees

We now communicate with our employees using the telephone, e-mail 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 cell phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: B. Brockland

<b>Caller</b>	<b>Call Recipients</b>
<i>B. Brockland</i>	<i>M. Jung, J. Michaels, B. Gordon</i>
<i>M. Jung</i>	<i>T. Malone, D. Moyer, P. Kumar, R. Martin, M. Johnson</i>
<i>B. Gordon</i>	<i>H. Ewen, P. Schmedt, B. Cahill, L. Levatino, B. Berger</i>

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. We communicate with our regulators using the telephone, e-mail, fax, U.S. mail 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.

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. Our major suppliers are: Telephone – Verizon [(800) 606-8855]; Dell Computer [(800) 757-8434]; Yuma Solutions [(813) 901-9716]; Bank of America Plaza – Security [(813) 221-7474].

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

### **B. Banks**

We have contacted our bank 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, N.A. 100 South Ashley Drive, Tampa, Florida 33602, (813) 225-4316, Contact: Sarah Maltese. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from JP Morgan Chase Bank, N.A. Contact: C. Philips (813) 483-8231 at 100 North Tampa Street, Tampa, FL. 33602.

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

### **C. Counter-Parties**

We have contacted our critical counterparties, such as other broker-dealers 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 contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

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

## **XII. Regulatory Reporting**

Our firm is subject to regulation by FINRA and the SEC. We now file reports with our regulators using paper copies in the U.S. mail and electronically using fax, e-mail and the Internet. In the event of an SBD, we will check with the SEC and FINRA 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. FINRA's Main Office [(561) 443-8000].

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

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

Our firm currently does not maintain or hold any customers accounts. We will provide in writing a BCP disclosure statement 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. In addition, our firm will review this BCP annually, on or around December 1, to modify it for any changes in our operations, structure, business or location.

*Rule: FINRA Rule 4370(b).*

Updated November 18, 2016