

BA Securities, LLC

BUSINESS CONTINUITY PLAN

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I. Emergency Contact Persons

Our firm's three emergency contact persons are:

Emergency Contact:	Alternate Phone Number:	Alternate Email:
Charles A. Jordan	610-716-6787	sorncapital@gmail.com
John J. Chuff	215-888-4267	jchuff@comcast.com

These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days of the end of each quarter.

Rule: FINRA Rule 4370

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 (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.

B. Approval and Execution Authority

Charles A. Jordan, as President has the authority to execute this Business Continuity Plan (BCP) and as the registered principal, is responsible for approving the plan and for conducting the required annual review.

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. We will provide a copy of our plan to our FINRA District Office located at 1835 Market Street, Suite 1900, Philadelphia, PA 19103-2932. An electronic copy of our plan is located on the firm's C Drive/BA SECURITIES, LLC/BCP in the folder name Compliance/Business Continuity Plan.

III. Business Description

Our firm engages in private placements of securities. Our firm is an introducing broker dealer and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities.

Our Firm has an office located in Location #1.

A. Office Location #1

Our Location #1 Office is located at Four Tower Bridge, 200 Barr Harbor Drive, Suite 400, W. Conshohocken, PA 19428. The main telephone number is 484-412-8788.

IV. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected offices to the closest of our unaffected office locations. If Location #1 is not available to receive staff, we will move them to the 16 Campus Blvd, Newtown Square, PA 19003

Rule: FINRA Rule 4370(c)(6)

V. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. Our clients are primarily Owners of Privately Held Securities that engage us to market these securities to QIBs. .

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 the appointed 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; 15 U.S.C. 78e (2003)

VI. Data Back-Up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary hard copy books and records and its electronic records at Four Tower Bridge, 200 Barr Harbor Drive, Suite 400, W. Conshohocken, PA 19428. The President, Charles A. Jordan is responsible for the maintenance of these books and records and can be reached at 484-412-8788. Our firm maintains the following document types and forms: Personnel Files, Compliance Files, Correspondence Files, Advertising Files, Due Diligence Files, Accounting Records, Articles of Organization and Minutes in both hard copy and scanned formats.

The President, Charles A. Jordan is responsible for the maintenance of these back-up books and records and can be reached at 484-412-8788. Our firm backs up its records various records daily and all records weekly using external drives that will be stored in either a "Fireproof" Safe or a Self Storage Facility. All Financial records can be accessed at any time by the firms FinOp who is out of state and can access to the firms' banking information. The FinOp also maintains a duplicate Quick Books file.

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)

VII. 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 a Broadcast Message using our Web Site. 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 Rule 4370(c)(3) & (f)(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 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 SEC and FINRA Notifications.

Rules: FINRA Rule 4370(e)(3), (c)(8) & (f)(2)

VIII. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of firms business. More specifically, these systems include:

Organization:	Services Offered:
Verizon	Phone Lines
Comcast Cable	Internet Provider
Smarsh Inc.	Email Service Provider

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions.

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.

A. Our Firm’s Mission Critical Systems

We presently conduct business with clients via telephone. During either internal or external an SBD, we will inform our customers and registered representatives via email or telephone, hard wired or wireless when normal communications may become available and what presently available alternative methods of order taking may be used.

In the event of an extensive external SBD, where our geographic connectivity is materially affected and the above described procedures are inadequate, we would use the facilities and location of any one of the following geographically convenient location at 16 Campus Blvd, Newtown Square, PA 19003

IX. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We will communicate with our customers using the telephone, e-mail, facsimile or U.S. Mail. 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 e-mail but the Internet is unavailable, we will contact them via telephone and follow up where a record is needed with paper copy by U.S. Mail.

Rule: FINRA Rule 4370(c)(4)

B. Employees

We will 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 office 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: Charles A. Jordan

Caller	Call Recipients
Charles A. Jordan	John J. Chuff, Shelley M. Aikins
John Chuff	Registered Representatives

C. Registered & Non-Registered Branch Locations

We will communicate with our Registered & Non-Registered Branch Locations by telephone, email or in person in the event of a SBD. Due to the nature of the firms business, these locations maintain only copies of all agreements, correspondence etc. with respect to the business conducted. Original files are maintained by the home office which backs up its records various records daily and all records weekly using external drives that will be stored in either a "Fireproof" Safe or a Self Storage Facility. The firm maintains a list of all Registered & Non-Registered locations and the contact information for each location. Customers are provided with a copy of the firms BCP Disclosure when establishing a relationship with the firm which provides information in the event of a SBD. (See BCP Disclosure at the end of this manual)

Rule: FINRA Rule 4370(c)(5)

C. Regulators

We are currently approved with the following SROs: Financial Industry Regulatory Authority ("FINRA") and United States Securities & Exchange Commission ("SEC"), California, Delaware, Florida, Illinois, Maryland, Minnesota, New Jersey, New York, Pennsylvania, Utah and Virginia. We will communicate with our regulators using the telephone, e-mail, facsimile and U.S. mail. 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)

X. 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: Wachovia Bank, Newton Square located at 3515 West Chester Pike, Newtown Square, PA 19073. If our bank and other lenders are unable to provide the financing, we will seek alternative financing immediately from: TD Bank at 1150 1st Ave, King Of Prussia, PA 19406

Rules: FINRA Rule 4370(c)(7)

C. Counter-Parties

We have contacted our critical counter-parties, such as other broker-dealers or customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD.

Rules: FINRA Rule 4370(a) &(c)(7)

XI. Regulatory Reporting

Our firm is subject to regulation by: Financial Industry Regulatory Authority (“FINRA”), United States Securities & Exchange Commission (“SEC”), and California, Delaware, Florida, Illinois, Maryland, Minnesota, New Jersey, New York, Pennsylvania, Utah and Virginia. We will file reports with our regulators using paper copies in the U.S. Mail, and electronically using facsimile, e-mail, 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)

XII. Disclosure of Business Continuity Plan

We will disclose in writing a summary of our BCP to customers in our initial introduction to the client and if an ongoing relationship we will provide a disclosure annually. We will also mail it to customers upon request. Our 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 specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, 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. (Section XV)

Rule: FINRA Rule 4370(e)

XIII. 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, in December of each calendar year, to modify it for any changes in our operations, structure, business, or location.

Rule: FINRA Rule 4370(b)

XIV. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Rule: FINRA Rule 4370(d)

Name: Francis X. Gallagher

Signature: 

Date: 10-25-2012

XV. BUSINESS CONTINUITY DISCLOSURE

BA Securities, LLC

Business Continuity Planning

BA Securities, LLC has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at 484-412-8788, you should call our alternative number 610-715-8335 and also look for updates on our website at www.basecuritiesllc.com.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt if we are unable to continue our business.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe.

In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24 hours of the disruption. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 48 hours.

In either situation, we plan to continue in business, and notify you through our web site www.basecuritiesllc.com or our customer alternate numbers located on our website. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at Four Tower Bridge, 200 Barr Harbor Drive, Suite 400, W. Conshohocken, PA 19428.