



Business Continuity Plan (BCP)

This Business Continuity Plan describes the operating procedures for TruAdvisors Financial, LLC, a registered investment advisor (collectively, “TruAdvisors”, “we”, “us”, or “our”) when business disruptions arise.

I. Emergency Contact Persons

TruAdvisors Financial, LLC two emergency contact persons are: Matthew K. Moll, Managing Partner, phone: (727) 300-4225, email address: mmoll@TruAdvisors.com and Charles Schwab & Co., Inc. at (800) 515-2157. Charles Schwab & Co., Inc. is the primary custodian and broker dealer for TruAdvisors Financial, LLC.

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

II. Firm Policy

TruAdvisors Financial, LLC’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)

TruAdvisors’ 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

Matthew K. Moll, a registered principal, is responsible for approving the plan and for conducting the required annual review. Matthew K. Moll has the authority to execute this BCP.

C. Plan Location and Access

TruAdvisors 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 our firm's website at www.TruAdvisors.com.

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

III. Business Description

TruAdvisors Financial, LLC conducts business in equity, fixed income, and derivative securities. 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. 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 only retail customers. We do not engage in any private placements. Our clearing firm is *Charles Schwab & Co., Inc.* Our custodian and broker dealer is *Charles Schwab & Co., Inc.* *Charles Schwab & Co., Inc.* can be contacted by phone at (800) 515-2157 or by mail at P.O. Box 628290, Orlando, FL 32862-8290.

IV. Office Locations

TruAdvisors Financial, LLC is located at 2202 N West Shore Blvd, Suite 200, Tampa, FL 33607. The main phone number is (888) 721-2040. The email address is Contact@TruAdvisors.com.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, TruAdvisors and its employees are able to maintain normal business functions remote of the normal office location, which is to be determined at Matthew K. Moll's discretion.

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

VI. Customers' Access to Funds and Securities

TruAdvisors Financial, LLC does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, Charles Schwab & Co., Inc. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our Web access is available, our firm will post on our website that customers may access their funds and securities by contacting TruAdvisors at (888) 721-2040 or Charles Schwab & Co., Inc. at (800) 515-2157. The firm will make this information available to customers through its disclosure policy.

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)

TruAdvisors Financial, LLC maintains its books and records electronically with Charles Schwab & Co., Inc. Charles Schwab & Co., Inc. is 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: client Advisory Agreements, ADV & Privacy Policy Statement Acknowledgements, Consent for Electronic Delivery, and Client Questionnaires.

Our firm backs up its paper records electronically. We back up our records each time a new client document is received. The firm backs up its electronic records daily through cloud storage offered by a qualified vendor and monthly on an external hard drive.

In the event of an internal or external SBD that causes the loss of our paper records, we will recover them electronically from our external hard drive or through our qualified cloud storage vendor.

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 (888) 721-2040 and Contact@TruAdvisors.com. 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.

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

IX. Mission Critical Systems

TruAdvisors “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. More specifically, these systems include: a secure company computer, secure internet access, business phone, and a copier and scanner.

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 [and] entry [and execution]. Our clearing firm provides, through contract, the [execution,] comparison, allocation, clearance and settlement of securities 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 has presented us with an executive summary of its plan, which is attached]. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us 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 firm represents that it backs up our records at a remote [or, *preferably*, out of region] site. Our clearing firm represents 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 firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing[, and it has confirmed that it tests its back-up arrangements every *time period*].

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 firm has the following SBD recovery time and resumption objectives: recovery time period of [*e.g., within 4 hours*]; and resumption time of [*e.g., within the same business day*].

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from customers only by either in person instructions or live phone interaction. 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 instructions provided to them by email and through the firm's website, www.TruAdvisors.com. If necessary, we will advise our customers to place orders directly with our clearing firm Charles Schwab & Co., Inc. by phone at (800) 515-2157.

2. Order Entry

Currently, our firm enters orders electronically with our clearing firm. *Alternatively*, we place customer orders through phone interaction with Charles Schwab & Co., Inc. at (800) 515-2157.

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 electronic submission or by placing a phone call. 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.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm 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 through phone calls, emails, virtual meetings, and in person visits. 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. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by: FINRA and the State of Florida. We communicate with our regulators using phone, email and postal 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).

XI. Critical Business Constituents and Banks

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. [or we have entered into a supplemental contract with certain critical business constituents to provide such services. The alternative suppliers are disclosed below.] Our major suppliers are: Charles Schwab & Co., Comply Technologies, Inc., Orion Advisor Solutions, Inc., Smarsh, Inc., Microsoft Corp., Financial Computer Services, Inc., Wix, Inc., Namecheap, Inc., Typeform S.L., AT&T Corporation, Carbonite, Inc., Brown & Brown, inc. (Calsurance), and DocuSign, Inc, Calendly, and Zoom.

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: Bank of America. The bank maintaining our Proprietary Account of Introducing Brokers/Dealers (PAIB account) is Charles Schwab & Co, Inc. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from additional sources.

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

XII. Regulatory Reporting

Our firm is subject to regulation by: FINRA and The State of Florida. 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

Attached is our written BCP disclosure statement we provide customers at account opening as well as annually. We also have posted the disclosure statement on our website, www.TruAdvisors.com, and mail it 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 firm.

Rule: FINRA Rule 4370(b).

XV. 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).

Signed: 

Name: Matthew K. Moll

Title: Managing Partner

Date: 11/20/2024

BCP Disclosure Statement for Introducing Firms with a Clearing Arrangement

TruAdvisors Financial LLC's Business Continuity Planning

TruAdvisors Financial, 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 (888) 721-2040 or email at Contact@TruAdvisors.com, or go to our website at www.TruAdvisors.com. If you cannot access us through either of those means, you should contact our clearing firm, Charles Schwab & Co, Inc. at (800) 515-2157 or at www.Schwab.com for instructions on how they may assist you with your account(s).

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 backup 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 access to their funds and securities if we are unable to continue our business.

Our clearing firm, Charles Schwab & Co., backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within [resumption time period]. Your orders and requests for funds and securities could be delayed during this period.

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 a reasonable time period. 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 reasonable time period. In either situation, we

plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website www.TruAdvisors.com or our customer emergency number, (888) 721-2040. 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 (888) 721-2040 or by email at Contact@TruAdvisors.com.