

LevelX Capital, LLC

ELECTRONIC STORAGE METHODS AND BUSINESS CONTINUITY PLAN

Effective as of January 1st, 2017

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I. <u>Electronic Mail Review and Storage</u>

In accordance with SEC Rule 17a-4(f)(2), the Company uses the Message Archiver, an outsourced electronic storage media service provided by Global Relay Communications Inc. ("Global Relay"), to store certain books and records as required by SEC Rules 17a-3 and/or 17a-4. Specifically, the Company hereby attests to the best of its knowledge and belief, that it satisfies the following requirements of SEC Rule 17a-4(f)(2)(ii)(A)-(D) in that the Company:

- **A.** Preserves the records exclusively in a non-rewriteable, non-erasable format;
- **B.** Verifies automatically the quality and accuracy of the storage media recording process;
- C. Serializes the original and, if applicable, duplicate units of storage media, and time-date for the required period of retention the information placed on such electronic storage media; and
- D. Has the capacity to readily download indexes and records preserved on the electronic storage media to any medium acceptable under (f)(2)(ii) of SEC Rule 17a-4 as required by the Commission or the self-regulatory organizations of which the Company is a member.

All incoming and outgoing electronic mail addressed to or sent by employees of LevelX, LLC (the "Firm") to and from their Firm email account is automatically captured and retained by Global Relay for archival and compliance review. Certain principals of the firm are granted supervisory review access to periodically, but not less frequently than weekly, conduct an inspection of such email correspondence. Firm principals will review the selected email for compliance with applicable SEC and FINRA rules and the Firm's policies governing communications with the public.

II. System Security

A. Virus Protection

All servers on the LevelX network run the Trend Micro Small Business Edition Anti-Virus Defense suite. Current version and configuration is monitored by the NAI e-Policy Orchestrator console from the following:

Trend Micro Client Server Messaging Suite for SMB, centrally controlled and monitored by the Office Scan Management Console on the Server named GSI6.

B. System Security

All workstations are password protected. The password guidelines require the staff to change their passwords periodically, but not less frequently than annually. Staff is prohibited from disclosing their password to any unauthorized person.

The Firm maintains a Astaro Firewall. The firewall is monitored by Paktolus ITS, located in Miami, Florida. This Department performs the configuration and audit of the firewall. In the event of a breach, Mr. Infante will be immediately notified.

All servers are located in a locked cabinet and Colocation Center. The only persons who have access to the servers are the office management and Information Systems staff from the LevelX office.

C. E-commerce

The Firm does not currently and does not intend to engage in e-commerce. Neither prospective nor existing clients will be using or accessing the Firm's systems.

D. <u>Voice Mail Security</u>

The voice-mail system is Avaya and the mailbox is password protected. Personnel may retrieve voice mail messages from an outside line by dialing their direct line, pressing ** when they hear the recording and entering the appropriate extension.

III. Data Backup and Recovery

A. Data Storage

The firm maintains its hard copy books and records at its principal place of business located at 117 NE 1st Ave Suite 3111 Miami, FL 33132 Mr. Crockett is responsible for the maintenance of these books and records. All electronic records/data is stored offsite on 36 NE 2nd Street, Suite 400. Miami, FL 33132 (ColoHouse). Paktolus ITS is responsible for the maintenance of data and records.

B. Backup Routines for Paper Records

Certain paper records are moved offsite to the location of International Data Depository after 1 year. International Data Depository is located at 5195 N.W. 77th Avenue Miami, Florida 33166 and maintains the records in a secure fire-proof location. The Firm maintains a catalog of all records maintained at International Data Depository.

Back-up and/or scanned original copies of the following books and records are stored:

- Signed FINRA Membership Agreement
- Current Fidelity Bond
- APEX Clearing
- For each RR,
 - Copy of signed Form U4
 - > Copy of signed termination letter to RR
 - Signed Compliance Manual Acknowledgments
 - Signed Annual Compliance Questionnaires
- Firm Element Acknowledgment Forms
- Written customer complaints and responses
- Signed Report re Insider Trading
- Signed Report re Market Timing
- Signed Report re Late Trading
- Customer Account Agreement Acknowledgment Form (beginning December 2004)
- Funds and Securities Receipts and Disbursements Logs for most recent 2 years
- AML Foreign Bank Correspondent Certifications
- Signed Audit Engagement Letter

The Firm will back-up these paper records by scanning the records. In the event of loss of our paper records, we will physically recover them by accessing the scanned copies, which will be backed up.

C. Backup Routines for Electronic Records

The Firm employs certain operational systems to ensure business continuity in the event of a system's failure. A full back up to a NAS of the main file server is performed each business day, Monday through Friday. A full backup consists of the backing up all data contained on the drives.

The backups do not include all applications and operating system components. Paktolus ITS will reinstall the applications and operating systems components in the event of a disaster.

D. Data Protection

We currently use Symantec Backup Exec 10.D. backup software to protect our data.F. Performance Verification

Paktolus ITS, and/or Richard Crockett have primary responsibility for ensuring that the backup process is performed. Paktolus ITS reviews the backup logs and addresses any issues.

IV. External Hard Drive Backup & Backup Server

The Firm shall maintain at the Collocation facility a NAS Hard Drive Backup of the key components and daily files for the following:

a. File Server – All data for daily operations is stored on this server (GSI5).

The File Server manages all backups.

V. Business Continuity Plan

A. Implementation Authority

Richard Crockett, the Firm's Chief Compliance Officer has the authority to approve and implement the Firm's Business Continuity Plan ("BCP"). Mr. Richard Crockett has primary responsibility for implementation of this BCP.

B. Plan Location and Access

The Firm will provide all personnel with a copy of the BCP. The Firm will maintain a hard copy of the original BCP, all amendments thereto and the current BCP on the premises of the Firm. An electronic version of the BCP will be stored with the archived email. Personnel may request a new copy of the BCP from Richard Crockett.

C. Emergency Contact Persons

The Firm's primary emergency contact person is Christopher Infante, cinfante@LevelXcp.com. The Firm's secondary emergency contact person is Richard Crockett, rcrokett@LevelXcp.com.

If the Firm appoints new emergency contact persons, the Firm will update this BCP and will update the names in the FINRA Contact System within 17 business days of the end of the calendar quarter in which the change was made. The Firm's Executive Representative, Richard Crockett will review the information provided on the FINRA Contact System at least annually to ensure that the emergency contact information provided therein is accurate.

Contact information for personnel of the Firm and affiliates of the Firm is located at Appendix A.

Contact information for external parties is located at Appendix B.

Contact information for technology support is located at Appendix C.

D. <u>Description of Business</u>

The Firm is a registered broker/dealer. The Firm provides brokerage services to individuals, trusts and business entities, including institutional clients. The Firm is an introducing firm and does not perform any clearing function for itself or others. The Firm does not maintain custody of customers' funds or securities. All customer funds and securities are maintained by the custodian or clearing broker/dealer carrying the brokerage account. The Firm executes transactions in the brokerage accounts of its clients through Pershing, LLC. The contact information for the brokers or dealers the Firm utilizes is located at <u>Appendix B</u>. All transactions are sent to the clearing firm, which executes our orders, compares them, allocates them, clears and settles them. The clearing firm maintains the customer accounts, can grant customers access to the customer accounts, and delivers funds and securities. The Firm does not actively engage in any private placements.

The Firm operates from and maintains its original books and records from one office location, its principal place of business in Miami, situated at the following address:

Address
117 NE 1st Ave Suite 3111
Miami, FL 33132
OSJ/Branch
Non-Branch
location

109 White Oak Lane Suite 200 Old Bridge, NJ 08857

OSJ

Staff may travel to these office locations by foot or by car. Each Office of Supervisory Jurisdiction engages in order taking activities.

Contact information for each office is located at Appendix A.

E. <u>Disaster Recovery Plan</u>

This BCP contains specific information that will allow our managers and staff to efficiently and effectively mobilize their efforts and respond in the event of a significant or material internal or external business disruption ("SMBD"). The Firm's goal is, first and foremost, to safeguard the lives of our personnel. The secondary goals are to (a) safeguard the Firm's property, including regulatory books and records, (b) assure that customers can access their funds and securities and continue to transact business, and (c) restore normal business operations.

The itemization of tasks in this section provides a guideline of assigned responsibilities that must be followed in the event of an SMBD. Examples of an SMBD follow:

- 1. Extended loss of power
- 2. Extended disruption to telecommunications (internet and telephone)
- 3. Fire
- 4. Flooding (pipes)
- 5. Nuclear, biological or chemical fallout
- 6. Bombs or the threat of bombing
- 7. Riots
- 8. Terrorist attack
- 9. War
- 10. Hurricane, earthquake or other natural disaster

Phase 1 - Evacuation

1. **Task:** Decide severity of the threat. **Responsible:** Christopher Infante, and/or Richard Crockett

If threat is imminent and evacuation is advisable, evacuate all personnel immediately. All essential tasks may be performed from a remote location. If threat is not imminent, tasks 2 through 10 may be completed onsite. Keep in mind that the Firm's primary goal is the safety and well being of our staff.

2. Task:

Verify that contingency email addresses and cellular phones for the following key personnel are operational and inform the affiliate contacts of this contact information.

Responsible: Richard Crockett and Christopher Infante

Contingency Emails and Cellular Numbers - Personnel

Richard Crockett 847-533-3783 <u>rcrockett@LevelX.com</u> Christopher Infante 305-343-4733 <u>cinfante@LevelX.com</u>

3. Task: Send list of contingency contact information to key business contacts.

Responsable: Richard Crockett

APEX Clearing

Sheila Buschwald

214-765-1593

4. **Task**: Distribute current affiliate contact list and current staff contact list to all

employees of the Firm.

Responsible: Richard Crockett

5. **Task**: Identify Remote Site and make hotel reservations if appropriate.

Responsible: Richard Crockett

In the event of an SMBD, the Firm will move its staff from affected offices to the closest of its or its affiliates' unaffected office locations. If the Firm will be continuing its business operations at another LevelX office location, notify the principal contact of such office of the Firm's temporary relocation to those offices. Supplies and equipment will be available at all LevelX offices. Additional supplies can be purchased by Christopher Infante and such expenses will be reimbursed by the Firm.

If none of LevelX's other office locations is available to receive staff, we will move the staff to a Remote Site at another location, which may be a hotel. Contact information for hotels is listed at <u>Appendix E</u>. In the alternative, and if appropriate, key staff will be instructed to work from their respective homes.

If the Firm is utilizing an Archive Firm, and if appropriate, contact the Archive Firm and instruct Archive Firm to deliver appropriate backup tape(s) to Remote Site, if necessary.

6. **Task:** Designate the Principal who will be required to take telephone instructions

for securities transactions.

Responsable: Christopher Infante

Instruct the designated Principal to keep his/her cellular phone or other communication device (as agreed upon) in close proximity to his person during regular business hours throughout the duration of the disaster to take customer orders.

7. **Task:** Record greeting for all incoming calls to the Firm.

Responsible: Richard Crockett

The following message is a sample message that may be recorded:

Thank you for calling LevelX Capital. Today is [insert date]. Due to an emergency situation, we have evacuated our offices and have implemented our disaster recovery program. If you require immediate assistance, please contact us at _______. If you would like to place a securities transaction, please contact _______ at _____. We will update this message periodically to advise you of our scheduled return to normal business operations.

This message must include a telephone number of a principal of the Firm who can take all telephone instructions for securities transactions.

8. **Task:** Inform key business contacts of implementation of business continuity plan.

Responsible: Christopher Infante

APEX Clearing

Connor Rodriguez crodriguez@apexclearing.com 350 N St. Paul Street 1300 Dallas, TX 75201 214-765-1168

9. Task:

Box up current work to be sent to Remote Site.

Responsible:

All Personnel

Deliver current work that should be available at the Remote Site to Christopher Infante

10. Task:

Shut down operations.

Responsible:

All Personnel

Disconnect computers. Disconnect telephones. Take laptops. Depending on nature of the disaster and time considerations, box up computers or relocate computer equipment from floor to desktop or other elevated area (in the event of flooding).

Phase 2 - Offsite Operations

11. Task:

Establish offsite operations at Remote Site.

Responsible:

Richard Crockett

- a. If the Remote Site is located at a LevelX office, the data and systems should be readily available. If the Remote Site will be established at a location other than the LevelX offices, Mr. Infante will determine whether the IT consultant (Paktolus ITS) is required to set up the computer system and restore the data to the computer system at the Remote Site. If most key personnel will have laptops or remote access, setting up an alternate computer system may be unnecessary.
- b. Send an email to current active clients for whom the Firm has obtained email addresses and provide such clients with new contact information.
- c. If appropriate, change telephone greeting at the Firm's offices to provide Remote Site contact information.

Phase 3 – Damage Assessment

12. Task:

Assess the damage.

Responsible:

Christopher Infante, Richard Crockett.

- a. Contact Building Manager for assessment information.
- b. Determine whether the facility will be made operational within a short time, or whether an alternative long-term location is required. If an alternative long-term location is required, communicate needs to the Firm's members and commence search for alternative office space.
- c. If appropriate, identify appropriate parties to conduct a search and salvage operation.

13. Task:

Schedule return to Offices.

Responsible:

Christopher Infante, Richard Crockett

Prior to return, the building must be inspected for possible structural deficiencies.

- a. The wiring must also be inspected for any visible hazards.
- b. Communicate return date to all personnel. See Appendix A for contact information.
- c. Return archived materials to Archive Firm, if appropriate.

F. Business Continuity

1. Management of Accounts

In the event of an SMBD, Mr. Richard Crockett will immediately identify what means will permit the Firm to communicate with its customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SMBD will determine the means of alternative communication, the communications options the Firm may elect include telephone, telephone voice mail, facsimile, secure email, express mail delivery, and U.S. mail. In the event of an emergency, the Firm may utilize instant messaging and text messaging, where available, even though the use of these methods of communication is normally not permitted.

The following registered persons are authorized to place orders for the accounts of the Firm's customers:

- a. Juan David Hernandez
- b. Christopher Infante

In the event of an SMBD where evacuation is advisable, the registered persons will continue to manage the accounts from the Remote Site where internet connectivity to the clearing firm can be established.

If internet service is unavailable at the Remote Site, the Firm will place transactions in the customer accounts via telephone and/or facsimile. If both telephone service and internet service is not available at Remote Site, Mr. Hernandez or Mr. Infante, as appropriate, will consider relocating to an alternate location where service may be available.

2. Alternate Communication between the Firm and its Customers

The Firm now communicates with its customers using the telephone, e-mail, fax, U.S. mail, and inperson visits at our Firm. In the event of an SMBD, 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 the customer by e-mail but the Internet is unavailable, we will contact them via the telephone and, when appropriate, follow up the communication with a hard copy confirmation of the communication to be sent to the customer by the U.S. mail.

3. Customers' Access to Funds and Securities

The Firm does not maintain custody of customers' funds or securities. In the event of an SMBD and the Firm elects to move operations to a Remote Site, clients contacting the Firm via its main telephone number will be redirected to a telephone number at the Remote Site or to a registered principal's cellular or alternative telephone number. The designated registered principal will take client instructions via telephone at the telephone number provided and contact the clearing broker/dealer on the client's behalf to execute such instructions. Mr. Crockett or his designee will also contact the executing broker/dealers and advise them of the SMBD event.

If the Firm's IT personnel or IT consultant (Paktolus ITS) is able to access the Firm's web site and modify its content, the Firm will post on the web site a notification to customers that they may access their funds and securities by contacting Richard Crockett at 786-239-9526. The Firm will make this information available through its disclosure policy.

4. Alternate Communication between the Firm and its Employees and Key Contacts

We now communicate with our employees and key business contacts in-person and by telephone and email. In the event of an SMBD, Mr. Infante will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that the Firm has used in the past to communicate with the employees and key contacts. The Firm will also employ a call tree so that the Firm can reach all employees and key contacts quickly during an SMBD. The call recipients' business, home and/or cellular telephone numbers are located at Appendices A and B.

5. Alternate Communication between the Firm and its Regulatory Authorities

The Firm is currently registered as a broker/dealer with the FINRA, the SEC, the State of Florida, and various other states. The Firm communicates with its regulators using the telephone, facsimile, U.S. mail and express mail delivery. In the event of an SMBD, Mr. Infante will assess which means of communication are still available to the Firm and use the means closest in speed and form (written or oral) to the means that the Firm has used in the past to communicate with the regulators. Contact information for the regulators is located at Appendix D.

6. Financial and Credit Risk

In the event of an SMBD, Mr. Infante will determine the value and liquidity of the Firm's investments and other assets to evaluate the Firm's ability to continue to fund its operations and remain in compliance with net capital and/or net worth requirements. If Mr. Infante determines that the Firm may be unable to meet its obligations or to otherwise continue to fund its operations, Mr. Infante will request its shareholders to make a capital contribution to the Firm or will request financing from the Firm's bank or other credit sources to fulfill the Firm's obligations to clients and other parties. If the Firm is not able to immediately remedy a capital deficiency, Mr. Infante will file the appropriate notices with the regulatory authorities and outline the steps the Firm will take to remedy the deficiency.

7. Maintenance Contracts

All personal computers and servers are covered by a warranty from Dell Computer. We have a Structured On-going Support Agreement with Paktolus ITS, located at 3550 Biscayne Blvd. Suite 400, Miami, Florida 33137. Contact information is located at Appendix B.

8. Mission Critical Systems

The 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.

The Firm has 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 order entry.

(a) Order Taking

Currently, the Firm receives orders from customers via telephone/facsimile/e-mail/in person visits by the customer. During an SMBD, we will continue to take orders through any of these methods that are available and reliable. 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 contacting our office and being redirected to a registered principal who can take their orders. If necessary, we will advise

our customers to place orders directly with our clearing firm. Contact information for the clearing firm is set forth on <u>Appendix B</u>.

(b) Order Entry.

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

In the event of an internal SMBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include by telephone or email from a Remote Site. We also may need to refer our customers to deal directly with our clearing firm for order entry. In the event of an external SMBD, 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.

Our clearing firm provides, through contract, the 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.

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 presented us with an executive summary of its plan, which is attached at Exhibit II. 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 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 at least annually.

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 recovery time and resumption objectives: recovery time period within 4 hours and resumption time within the same business day.

9. Business Constituents

The Firm has contacted its critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing the Firm with critical services), and determined the extent to which we can continue our business relationship with them in light of an internal or external SMBD.

We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we require them because of an SMBD to them or the Firm. Our major suppliers are: Paktolus ITS Oscar Gonzalez 3550 Biscayne Blvd., Suite 400 Miami, Florida 33137 1.888.489.3330 help@paktolusits.com www.paktolusits.com

10. Data Restoration at LevelX Office

In the event that the Firm for any reason must restore data to its systems at the Firm's offices, Richard Crockett (or the Archive Firm, if appropriate) shall deliver the requisite External Hard Drive to the Firm's business location within 1 business day.

VI. Regulatory Reporting

The Firm is subject to regulation by the SEC, the FINRA, and the States of Registered.

We now file reports with our regulators using paper copies in the U.S. mail, and electronically using e-mail, and the Internet. In the event of an SMBD, 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, the Firm will continue to file required reports using the communication means available to us. Contact information for regulators is attached at Appendix D.

VII. Disclosure of Business Continuity Plan

The Firm discloses in writing a summary of our BCP to customers upon establishment of the account (as part of the Customer Account Agreement). The Firm will also mail the BCP summary to its customers upon request.

The BCP summary addresses the possibility of a future SMBD 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 citywide 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. The BCP summary includes cautionary language that the plan is subject to modification and that customers may alternatively obtain updated summaries by requesting a written copy by mail.

VIII. Management Succession

If in the event of an emergency, if the following persons cannot be located or are unable to continue their normal duties, their authorities and duties shall, without further action by the Members or Managers, be automatically assumed by the following persons in the sequence designated.

1. Principal:

Richard Crockett

Backup:

Christopher Infante

Duties:

All duties. Mr. Christopher Infante maintains the necessary qualifications to assume

the duties of Compliance Officer.

2. Principal:

Christopher Infante

Backup:

Richard Crockett

Duties:

All duties. Mr. Richard Crockett Ramos maintains the necessary qualifications to

assume the duties of Mr. Infante.

3. Principal:

Publio Velasco

Backup:

Richard Crockett

Duties:

All duties except those required to be performed by a FINOP may be assumed by

Richard Crockett

In the event of Mr. Velasco's prolonged absence, the Firm may contract with another FINOP as a consultant for the interim to handle the FINOP responsibilities and/or may

consider requiring another Registered Principal to qualify as a FINOP.

4. Principal:

Christopher Infante

Duties:

All duties as Options Principal may be assumed by Christopher Infante.

The authority of the above-named individuals shall continue until the duly elected officer becomes available to perform the duties assumed or until the Members or Managers appoint another individual to assume those duties.

IX. Review and Approval

A. Updates and Annual Review

Mr. Richard Crockett will periodically but not less frequently than annually, assess the changes in the firm's exposure to operational risk and financial and credit risk and make the appropriate changes to this BCP as each assessment dictates. In addition, Mr. Richard Crockett shall assess all operational risks and financial and credit risk of the firm any time the disaster recovery procedures are implemented due to a disaster or other emergency situation and shall make necessary adjustments to the procedures at that time to ensure that the operational risks and financial and credit risks are minimized.

Mr. Richard Crockett will update this plan whenever there is a material change to the Firm's operations, structure, business or location. In addition, Mr. Richard Crockett will conduct a thorough review this BCP not less frequently than annually to assure that all requisite modifications have been made and shall make any further modifications as appropriate. A copy of the revised BCP shall be provided to all personnel. A current copy of the BCP shall be maintained at the principal offices of the Firm.

B. Management Approval

I, Richard Crockett, Executive Representative of LevelX Capital, LLC, have approved this Business Continuity Plan effective March 16th, 2015 and believe that it is reasonably designed to enable the Firm to meet its obligations to customers in the event of a significant or material business disruption.

Signed:

Richard Crockett

Chief Compliance officer.

Date:

Appendix A – Internal Contact List

LevelX Capital LLC

Offices

109 White Oak Lane Old Bridge NJ 08857

Primary Contact Christopher Infante Telephone 305-373-3326

Facsimile

305-373-8680

Personnel List maintained with Management

Appendix B – External Contact List

Clearing Firms

APEX Clearing

Connor Rodriguez crodriguez@apexclearing.com 350 N St. Paul Street 1300 Dallas, TX 75201 214-765-1168

Contact Bloomberg Professional Service Support through the 24-hour technical support line at 212-318-2100.

Appendix C - Technology Venders

<u>Dell</u>

One Dell Way Rond Rock, TX 78682

Dell Express Code: 39033714745

Tele: 888-560-8324 800-www-dell

IT Firm

Paktolus ITS. 3550 Biscayne Blvd. Suite 400 Miami, Florida 33137 1-888-489-3330 help@paktolusits.com www.paktolusits.com

Technical Collocation Site

ColoHouse

36 NE 2nd Street. Suite 400 Miami, FL 33132 1-866-790-COLO 305-731-2225

Appendix D – Contact List for Regulators

FINRA New Jersey Office

SEC Regional Office

Southeast Regional Office David Nelson, Regional Director 801 Brickell Ave., Suite 1800 Miami, FL 33131 (305) 982-6300

e-mail: miami@sec.gov

Appendix E – Remote Site/Hotel Listing

In the event a business interruption affecting the New Jersey Office, we may relocate personnel to the Mexico Office, hotels and/or home offices. In the event of a business interruption affecting the Mexico Office and Columbia Office, we may relocate to the New Jersey Office. We have also identified the following Remote Sites, including hotels, as possible places where the Firm may establish its alternate headquarters for a limited time period.

LevelX Offices

117 NE 1st Ave Suite 3111 Miami, FL 33132 109 White Oak Lane Suite 200 O Old Bridge, NJ 08857

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