Triple A Partners LLC

Business Continuity Plan (BCP)

This is a Business Continuity Plan (“BCP”) for Triple A Partners LLC (the “Firm”).

# Emergency Contact Persons

Our firm’s two emergency contact persons are:

Warren Wibbelsman,

Email: ww@triplea-us.net

Primary Phone:310-773-8127

Primary Fax: none

Alternate Phone: 310-773-8127

Alternate Fax: None

William Morgan

Email: billmorgan@triplea-us.net

Primary Phone: 626-827-2116

Primary fax: 310-943-0419

These names will be updated promptly in the event of a material change.

*Rule: FINRA Rule 4370(a)*

# 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, 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.

## 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, especially on the capabilities of our clearing firm.

## Approval and Execution Authority

Warren Wibbelsman, COO, CCO, CEO, AMLCO, a registered principal, is responsible for approving the plan and for conducting the required annual review. Mr. Wibbelsman has the authority to execute this BCP.

## 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. An electronic copy of our plan is located with our document archiving service “Global Relay”.

# Business Description

The firm’s primary business will be in (1) Private Placements. The Firm will also act as an introducing broker to investors to invest in Private Placements in the US and Foreign markets. Furthermore, we do not hold customer funds or securities.

# Office Locations

## Office Location #1

Our Location #1 Office is located at 2916 Grand Canal, Venice CA 90291. Its main telephone number is 424-369-5143. Our employees may travel to that office by means of foot, car, subway, train, and bus.

## Office Location #2

Our Location #2 Office is located at 323 Beirut Ave, Pacific Palisades CA 90272. Its main telephone number is (310) 454-5131. Our employees may travel to that office by means of foot, car, subway, train, and bus.

# 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 none of our other office locations is available to receive those staff, we will move them to 323 Beirut Ave Pacific Palisades CA 90272. Its main telephone number is (310) 454-5131.

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

# Customers’ Access to Funds and Securities

Our firm does not maintain custody of customers’ funds or securities, as we have no retail customers. The limited nature of our business, which consists exclusively as agent of (1) Private Placements. The Firm will also act as an intermediary broker to investors to invest in Private Placements. We cannot receive or hold any customer funds or securities, as this is not permitted under our exemption from SEC Rule 15c3-3. If our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, we will notify the SEC, FINRA and any other appropriate regulatory authorities, and provide our books and records if requested.

*Rules: FINRA Rule 4370(a);* Securities Exchange Act Rule 15c3-1;15 U.S.C. 78eee (2003).

# Data Back-Up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary hard copy books and records and its electronic records at 2032 Armacost Ave, Los Angeles, CA 90025. Mr. Wibbelsman, (310) 7738127 is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms:

* Corporate Financial Records
* Correspondence – both written and electronic
* Marketing Materials
* Engagement Letters and other contractual obligations
* Subscription Agreements

Our firm maintains its back-up hard copy books and records at Firm’s main office. These records consist of the firm’s internal accounting records, subscription agreements and paper copies. These records are also maintained at the backup site 323 Beirut Ave, Pacific Palisades CA 90272 (310) 454-5131, Mr. Wibbelsman is responsible for the maintenance of these back-up books and records. If the Firm’s primary site is inoperable, we will continue operations from the back-up site or an alternative location. For the loss of electronic records maintained at the Firm’s main office, we well physically recover the hard copy data from our primary site

*Rule: FINRA Rule 4370(c)(1).*

# Financial and Operational Assessments

## 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 our Web site (<http://www.tripleapartnersllc.net/>), telephone voice mail, secure e-mail. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

The financial and operational risks in the event of an internal SBD are not great.  The firm’s assets are substantially all allowable, as defined by SEC Rule 15c3-1 and consist of cash in FDIC insured bank accounts.  The internal accounting records needed to maintain the business are located offsite.  We do not foresee that an internal SBD would significantly impair its ability to conduct business from a financial or operational standpoint.  This information will be reviewed and the BCP amended as necessary on an annual basis or at any time that circumstances dictate.

*Rules: FINRA Rule 4370 (c)(3) & (f)(2); Securities Exchange Act Rule 15c3-1.*

## 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, including infusion of capital from its parent company Triple A Capital Inc.

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

# Mission Critical Systems

Our firm conducts business exclusively in (1) Private Placements The Firm will also act as an introducing broker to investors to invest in Private Placements in the US and Foreign markets. Therefore our only mission critical systems are our internal electronic and paper records located at our main office. All data on this system is backed up daily to an offsite location under the control of our outside IT consultants.

*Rules: FINRA Rule 4370 (c) & (f)(1).*

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

A. Customers

We now communicate with our customers using [*insert all that apply*] the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits at our firm or at the other’s location. 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 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. 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 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: Warren Wibbelsman

|  |  |
| --- | --- |
| **Caller** | **Call Recipients** |
| *Warren Wibbelsman* | *William Morgan* |
| *Warren Wibbelsman* |  |
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|  |  |
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*Rule: FINRA Rule 4370 (c)(5).*

C. Regulators

We are currently members of FINRA and the SEC *.* 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).*

# Critical Business Constituents, Banks, and Counter-Parties

## 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 constituents are:

The Message Center Team

[www.themessagecenter.com](http://www.themessagecenter.com)

415-762-0090

***Nima Aminian, CPA***Text

Description automatically generated  
***23801 Calabasas Road, Suite 2004  
Calabasas, CA 91302*Tel: 818-721-8078   
Fax: 818-436-5291**[**www.alamircpas.com**](http://www.alamircpas.com/)

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

## 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: Union Bank of California, 1101 Montana Ave., Santa Monica, CA 90403. The phone number is (310) 451-4898 and our main contact is Jeanette Perez. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from its parent company Triple A Partners Inc.

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

## Counter-Parties

We have contacted our critical counter-parties, such as other broker-dealers or institutional customers, 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 work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

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

# Regulatory Reporting

Our firm is subject to regulation by the SEC, FINRA, and State regulated agencies in those jurisdictions where the Firm is registered. 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, 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.

**SEC – Los Angeles Regional Office**

Michele Wein Layne, Regional Director

444 South Flower Street, Suite 900

Los Angeles, CA 90071

(323) 965-3998

e-mail: [losangeles@sec.gov](mailto:losangeles@sec.gov)

**FINRA District 2 – Los Angeles**

David A. Greene, Director

300 South Grand Avenue, Suite 1600  
Los Angeles, CA 90071-3126

(213) 229-2300  
Fax: (213) 617-3299

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

# Disclosure of Business Continuity Plan

We provide a copy of the Business Continuity Plan to customers or counterparties upon request.

*Rule: FINRA Rule 4370 (e).*

# Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, or business. In addition, our firm will review this BCP annually to modify it for any changes in our operations, structure, business, or location.

*Rule: FINRA Rule 4370 (b).*

# 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).*

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| --- |
|  |
| Warren Wibbelsman |
| Signature |
| Date |