



Business Continuity Plan 2024

August 6, 2024

Per FINRA Rule 4370, this Business Continuity Plan is subject to modification without notice and is designed so that our clients can make informed choices should our business be subject to an interruption in the services that we typically provide to you. We will gladly send you a copy of our most recent Business Continuity Plan disclosure document upon written request.

I. Emergency Contact Persons

Our firm's two emergency contact persons are:

- Mr. David Dalzell, Principal, 617-340-5314, ddalzell@dalzelltrading.com
- Mr. Trey Bauer, Principal, 617-340-5315, tbauer@dalzelltrading.com

The firm will provide FINRA with the contact information for the two emergency contact persons: (1) name; (2) title; (3) mailing address; (4) email address; (5) telephone number; and (6) facsimile number through the FINRA Contact System (FCS). Mr. Dalzell will promptly notify FINRA of any change in this information through FCS (but no later than 30 days following the change) and will review, and if necessary update, this information within 17 business days after the end of each calendar year. On the FCS, the BCP Primary Contact is Mr. Dalzell and the BCP Secondary Contact is Mr. Bauer. Both emergency contact persons are general securities principals.

Rule: FINRA Rule 4370(f); FINRA Rule 4517.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding associated person's 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 clients to transact business. In the event that we determine we are unable to continue our business, we will assure clients prompt access to their funds and securities.

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 such as a pandemic. Our

response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm, OMS, execution platform and our clients' prime brokers and custodians.

Pandemic Preparedness:

FINRA issued Regulatory Notice 20-08 as a result of the COVID-19 pandemic to provide guidance to member firms. Our branch office was not in the most severely affected area and is staffed by two people. Given the nature of our business our staff preferred to continue to go into the office on a daily basis both during the pandemic and in its aftermath. Other associated persons continued to work from their home office. Therefore, for those that chose to our BCP had already built in the flexibility to work remotely. As this Regulatory Notice points out, firms are required to keep their emergency contacts up to date so FINRA can contact the firm if it needed. The firm had not made use of the “regulatory relief” FINRA provided. The firm’s cyber security procedures remained secure during the pandemic and its aftermath. The firm reported no adverse incidences. The firm’s communications with clients was not impeded by the pandemic. The firm makes note of FINRA’s special Call Center number and will call when needed; it is 301-590-6500.

B. Approval and Execution Authority

Mr. Dalzell, a registered principal, is responsible for approving the plan and for conducting the required annual review. He has the authority to execute this BCP.

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. An electronic copy of our plan is located on Mr. Dalzell’s hard drive in his personal computer. The firm’s compliance consultant also maintains a copy off-site.

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

III. Business Description

Our firm conducts an outsourced trading business in equity and options securities. Our firm is an introducing broker-dealer firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold client funds or securities. We accept and enter orders. All transactions are sent via our OMS and execution platform and then our clearing firm for clearance and settlement. Our clients’ prime brokers and custodians maintain our clients’ accounts, can grant clients access to them, and delivers funds and securities. Our firm services only institutional clients. We do not engage in any private placements or investment banking.

Our clearing firm is RBC Capital Markets, LLC, 3 World Financial Center, 200 Vessey St., New York, NY 10281.

IV. Office Locations

Office Location #1 Main OSJ BR No. 734754

Our Location #1 Office is located at 250 E. Beaver Ave., Suite 772, State College, PA 16801. Its main telephone number is 617-340-5313. Our associated persons may travel to that office by means of foot, car, train, bus, boat, plane, etc. The OSJ Co-supervisors are Mr. David Dalzell and Mr. Trey Bauer.

V. Alternative Physical Location(s) of Associated Persons

In the event of an SBD, we will move our staff from the affected office(s) to the closest of our unaffected office location(s). If none of our other office locations are available to receive those staff, we will move them to the offices of our FINOP, Ms. Monique Romero, ACI, 77 Water St., Suite 1604, New York, NY 10005. Its main telephone number is 212-668-8700. Non-essential personnel can work from their home office to the extent feasible.

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

VI. Client Access to Funds and Securities

Our firm does not maintain custody of client funds or securities, which are maintained at our clients' prime brokers and custodians. In the event of an internal or external SBD, if telephone service is available, our registered persons will take client orders or instructions as usual. If not, our clients are advised to contract their prime brokers and custodians. The firm will make this information available to clients through its BCP Disclosure Policy per FINRA Rule 4370(e).

If SIPC determines that we are unable to meet our obligations to our clients 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 clients. We will assist SIPC and the trustee by providing our books and records identifying client accounts subject to SIPC regulation.

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 250 E. Beaver Ave., Suite 772, State College, PA 16801. Its main telephone number is 617-340-5313. Mr. Dalzell is responsible for the maintenance of these books and records.

Our firm maintains other documents electronically at both the main OSJs in Pennsylvania and the offices of our FINOP.

Our firm does not maintain its back-up hard copy books and records at another address other than the main OSJs. Mr. Dalzell and the firm's FINOP are responsible for the maintenance of the original and back-up books and records. Our firm backs up its paper records electronically.

The firm backs up its electronic records daily and keeps copies in the main OSJ; in addition, some duplicate records are also stored electronically by the FINOP and the compliance consultant.

The firm has contracted with Thrive Operations, LLC ("Thrive") to provide IT support, disaster recovery capabilities, archiving electronic messaging services and backup of computer hardware in a geographically separate area.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our electronic backup archive. 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 our archive.

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

VIII. Financial and Operational Assessments

The firm's financial and operational assessments are reviewed periodically and often as part of the supervisory controls testing or annual internal inspections. Both Mr. Dalzell and the FINOP are assessing the credit risk exposure on an ongoing basis and will most certainly address the firm's resources in the event of an SBD.

A. Operational Risk

Operational risk includes the firm's ability to maintain communications with clients and to retrieve key activity records through its mission critical systems.

In the event of an SBD, we will immediately identify what means will permit us to communicate internally, with our clients, critical business constituents, critical banks, critical counterparties 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, telephone and voice mail to the extent of availability. In addition, we will retrieve our key activity records as described in the section above, Data Backup 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

Financial risk involves the firm's ability to fund operations and maintain adequate financing and sufficient capital. The firm also may face credit risk (where its investments may erode from the lack of liquidity in the broader market), which would also hinder the ability of the firm's counterparties to fulfill their obligations.

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 clients to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counterparties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the necessary steps.

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 securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of client accounts, access to client accounts and the delivery of funds and securities. More specifically, these systems include: LiquidityBook (OMS), REDI+ (EMS), EIKON (Market Analytics), and RBC Capital Markets, LLC (Clearance and Settlement). Our IT firm, Thrive, will assist in our firm having full access to our mission critical systems as quickly as possible; Thrive provides IT support, disaster recovery capabilities, electronic messaging services and archiving and backup of computer hardware in a geographically separate area.

We have primary responsibility for establishing and maintaining our business relationships with our clients and have sole responsibility for our mission critical functions of order taking and entry and execution. Our clearing firm provides clearance and settlement of securities transactions: maintenance of client accounts, access to client funds and securities is the responsibility of our clients' prime brokers and custodians. All client accounts are institutional and operate on a DVP/RVP basis.

Our clearing firm contract will provide that it will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm, RBC Capital Markets, LLC 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. 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 correspondent broker-

dealers. 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. As FINRA members our clients' prime brokers and custodians also maintain a BCP. Since the onset of the COVID-19 pandemic and its aftermath financial services firms have placed renewed importance on having a practical, effective business continuity plan.

Mr. David Dalzell will periodically, no less than annually, review our mission critical systems and vendors for our firm.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from clients via FIX line, telephone, and email. 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 clients when communications become available to tell them what alternatives they have to send their orders to us. Clients will be informed of alternatives by phone, email, text message, and/or website. If necessary, we will advise our clients to place orders directly with their prime brokers or custodians.

2. Order Entry

Currently, our firm enters orders by recording them electronically and sending them to our LiquidityBook OMS. We have contacted LiquidityBook OMS and were informed that their Service Level Agreements define their application as being "accessible and operational" for 99.8% of regular business hours. When their application is not accessible and operational, LiquidityBook has internal escalation procedures to identify, categorize (Critical, Major, Minor) and respond to business disruptions as follows: *Critical* (within 30 minutes), *Major* (within 2 hours) and *Minor* (within 2 days).

3. Order Execution

We currently execute orders by electronic transmission (FIX) through LiquidityBook (OMS) and REDI+ (EMS). In the event of an internal SBD, we would execute by FIX, phone or email (whichever is available) directly with available broker dealer counterparties. In the event of an external SBD, we would execute by FIX, phone or email (whichever is available) directly with available broker dealer counterparties.

4. Other Services Currently Provided to Clients

In addition to those services listed above in this section, we also communicate intraday with our clients by phone and email. In the event of an internal SBD, we would utilize any available phone, email or text to communicate with our clients. In the event of an

external SBD, we would utilize any available phone, email or text to communicate with our clients.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm for clearance and settlement.

Rules: FINRA Rules 4370

X. Alternate Communications Between the Firm and Clients, Associated Persons, and Regulators

A. Clients

We now communicate with our clients using the telephone, email, our website, fax, U.S. mail and in-person visits at our firm or another 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 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. Associated Persons

We now communicate with our associated persons using telephone, email, 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 associated persons quickly during an SBD. The call tree includes all staff office and cell phone numbers.

The person to invoke use of the call tree is: Mr. Dalzell.

Caller	Call Recipients
David J. Dalzell 617-340-5314 and cell 508-808-3104	Lance Meyerowich 617-340-5313 and cell 917-902-9420
	Trey Bauer 617-340-5315 and cell 814-777-8035
	Monique Romero, FINOP, 212-668-8700 and cell 571-309-2158
	Pamela Rockley, Consultant, 203-956-5900 and cell 203-644-3545

The firm has reviewed FINRA Regulatory Notice 21-29 to assist with its supervisory obligations related to third-parties and outsourcing. During the COVID-19 pandemic, member firms have continued to expand the scope and depth of their use of technology and have increasingly leveraged vendors to perform risk management functions and to assist with various activities.

All vendors selected for use by the firm are carefully vetted before a contract is signed. Most vendors have been well known to the firm for years and were initially selected as premier outsourced providers in their respective areas.

The firm reviewed FINRA Regulatory Notice 05-48 and carefully examines each proposed outsourced activity to ensure that it does not require securities licensing on the part of the provider's staff member performing the service.

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 and the SEC. We communicate with our regulators using telephone, email, fax, U.S. mail, 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.

Rule: FINRA Rule 4370(c)(9).

XI. Critical Business Constituents, Banks, and Counterparties

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: LiquidityBook (OMS) 646-975-5152, Thompson Reuters REDI+ (EMS) and EIKON (market analytics) 646-223-8997, Thrive (IT Support, DR, Backup, Archiving) 617-982-2414.

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. We currently do not utilize any outside financing. The bank maintaining our operating account is: Bank of America, 185 Linden St., Wellesley, MA 02482, (781) 235-1888.

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

C. Counterparties

We have contacted our critical counterparties, such as other broker-dealers or institutional clients, to determine if we will be able to carry out our transactions with them in light of an internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

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

XII. Regulatory Reporting

Our firm is subject to regulation by: FINRA and the SEC. We now file reports with our regulators electronically over the Internet and/or email/fax. 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.

Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549
202-942-8088

Securities and Exchange Commission
33 Arch St. 23rd fl.
Boston, MA 02110-1424
617-573-8900

FINRA
9509 Key West Avenue, 5th Floor
Rockville, MD 20850
301-590-6500

FINRA District 9A
1601 Market St. Suite 2700
Philadelphia, PA 19103

FINRA

Risk Monitoring Analyst
Mariel Krefft
Main 646-315-8818
mariel.krefft@finra.org

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

XIII. Disclosure of Business Continuity Plan

Attached is our written BCP disclosure statement which we provide to clients at account opening. We also post the disclosure statement on our website and will mail it to clients 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(s). In addition, our firm will review this BCP annually, on a calendar year basis, to modify it for any changes in our operations, structure, business or location or those of our mission critical counterparties.

Consistent with FINRA Rule 4511 (General Requirements), we will also employ the use of firm-wide emails or text messages or notifications, or a call tree so that senior management can reach all associated persons quickly during an SBD. In addition, in the event that associated persons move to a back-up location or remote location for an extended period of time (e.g., due to a pandemic), we will circulate updated employee contact information within the firm to maintain service.

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 clients in the event of an SBD.

Rule: FINRA Rule 4370(d).

Signed: David J. Dalzell _____

Title: CEO and Founder

Date: August 6, 2024

Attachment A Dalzell Trading, LLC Business Continuity Plan

Dalzell Trading, LLC Business Continuity Planning Disclosure

August 2024

Dalzell Trading, LLC has developed a Business Continuity Plan as to 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 617-340-5313 or email DDalzell@DalzellTrading.com, you should call our alternative number 617-340-5315, or email tbauer@DalzellTrading.com, or go to our website at www.DalzellTrading.com. If you cannot access us through either of those means, you should contact your prime broker or custodian for instructions on how you may enter orders and process transactions and other trade-related issues.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our associated persons and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our clients to continue 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 clients, associated persons, and regulators; alternate physical location of associated persons; critical suppliers, contractors, bank and counter-party impact; regulatory reporting; and assuring our clients prompt access to their funds and securities if we are unable to continue our business.

Our IT Services firm, Thrive Operations, LLC, archives and backs up our computer hardware and applications 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 Thrive that during a “Critical Event”, Thrive shall respond during business hours within five minutes from receiving the report and update Dalzell Trading on the problem every hour thereafter. Thrive shall respond during non-business hours within one hour from receiving the report and update Dalzell Trading every two hours thereafter. Your orders and requests for trading and market related information 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 two business days. 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 two business days or less. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you how to contact us through our website, www.DalzellTrading.com or our back-up client emergency number, (508) 808-3104. If the significant business disruption is so severe that it prevents us from remaining in business, client's prompt access to their funds and securities through their prime brokers and custodians.

For more information – If you have questions about our business continuity planning, you can contact us at 250 E. Beaver Ave., Suite 772, State College, PA 16801. Its main telephone number is 617-340-5313.

Attachment B Critical Business Constituents, Banks, and Counterparties

Thrive Operations, LLC, 25 Forbes Blvd., Foxboro, MA 02035, 866.205.2810

LiquidityBook LLC, 561 Seventh Ave., New York, NY 10018, 646-975-5152

ACI Accounting and Compliance International, 77 Water Street, New York, NY 10005, 212-668-8700, Ms. Monique Romano, mromano@acisecure.com

Compliance Directives LLC, 7 Dewal Dr., Norwalk, CT 06851, 203-956-5900, Ms. Pamela Rockley, prockley@compliancedirectives.com

RBC Capital Markets, LLC, 3 World Financial Center, 200 Vessey St., New York, NY 10281

LSEG (market data) 10 Paternoster Square, London, EC4M 7LS