

# **Teckmeyer Financial Services, LLC**

## **Business Continuity Plan**

### **December 1, 2020**

#### **Emergency Contact Persons**

Our firm's emergency contact person is:

- 1) Thomas N. Teckmeyer, President  
[tom@teckmeyerfinancial.com](mailto:tom@teckmeyerfinancial.com)  
work: (402) 331-8600  
home: (402) 488-6276  
mobile: (402) 301-4486

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

#### **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 work closely with RBC Correspondent Services (RBC), mutual fund companies, variable annuity companies, and any other entity that holds client accounts to assure our clients 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**

Thomas N. Teckmeyer, president and a registered principal of Teckmeyer Financial Services, is responsible for approving the plan and for conducting the required annual review. He also has the authority to execute this BCP.

#### **Plan Location and Access**

Our firm will maintain copies of its BCP plan and annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on the T Drive under the file name WSP's December 1 2020.doc.

## **Business Description**

Our firm conducts business in equity, fixed income and mutual fund 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. We accept and enter orders. In addition, a certain number of our mutual fund transactions are carried out by submitting applications and/or checks directly to the mutual fund company. All transactions are sent either to our clearing firm or directly to a mutual fund or variable annuity company. Our clearing firm (or mutual fund or variable annuity company as appropriate) executes our orders, compares them, allocates them, clears and settles them. Our clearing firm (or mutual fund and/or variable annuity companies where appropriate) 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 private placements.

Our clearing firm is:

RBC Correspondent Services  
60 South 6<sup>th</sup> Street  
Minneapolis, MN 55402  
1-800-949-0242  
[www.rbccorrespondentservices.com](http://www.rbccorrespondentservices.com)

Our contact person at the clearing firm is:

Matt Machaiek  
612-371-2902  
[matt.machaiek@rbc.com](mailto:matt.machaiek@rbc.com)

## **Office Locations**

Our main office is located at:

11104 John Galt Blvd.  
Omaha, NE 68137  
(402) 331-8600

Our employees reach this office by automobile.

We have a branch office at Wahoo State Bank. That office is located at:

164 East 5<sup>th</sup> Street  
Wahoo, NE 68066  
(402) 331-8600

## **Alternative Physical Location(s) of Employees**

In the event of an SBD, we will do one of two things. Either: a) We will move some or all of our staff from the affected office to our closest unaffected office. Or b) In the event that neither office is usable, we will have our employees office out of their homes temporarily until our offices become useable or we locate new office space. While not a perfect solution, most employees have access to their mission critical applications from their home computers, so they would be able to view customer accounts, run trades and communicate via the phone and e-mail. A complete list of TFS employees' names, addresses, home phone numbers, cell phone numbers, and e-mail addresses is listed below.

### **Teckmeyer Financial Employees**

Tom Teckmeyer  
4007 South 81<sup>st</sup> Street  
Lincoln, NE 68506  
H: 402-488-6276  
C: 402-301-4486  
[tom@teckmeyerfinancial.com](mailto:tom@teckmeyerfinancial.com)

John Kroeker  
5860 Silverhawk Ct.  
Roca, NE 68430  
C: 402-525-0548  
[john@teckmeyerfinancial.com](mailto:john@teckmeyerfinancial.com)

Joel Hietbrink  
6430 Campbell Drive  
Lincoln, NE 68510  
H: 402-488-3421  
[joel@teckmeyerfinancial.com](mailto:joel@teckmeyerfinancial.com)

Cindy Nilus  
4324 N. 154<sup>th</sup> Avenue  
Omaha, NE 68116  
C: 402-431-8552  
[cindy@teckmeyerfinancial.com](mailto:cindy@teckmeyerfinancial.com)

Scott Taylor  
18923 Holmes Street  
Omaha, NE 68135  
C: 402-672-1240  
[staylor@teckmeyerfinancial.com](mailto:staylor@teckmeyerfinancial.com)

Doug Gustin  
1122 South Grandview  
Papillion, NE 68046  
H: 402-592-0592 / C: 402-707-3336  
[dgustin@teckmeyerfinancial.com](mailto:dgustin@teckmeyerfinancial.com)

Sara Barber  
6427 N. 150<sup>th</sup> Street  
Omaha, NE 68116  
H: 402-431-9861  
C: 402-676-2001  
[sara@teckmeyerfinancial.com](mailto:sara@teckmeyerfinancial.com)

Jarrett Suddarth  
323 S. 55<sup>th</sup> Street  
Lincoln, NE 68510  
(402) 710-8836  
[jarrett@teckmeyerfinancial.com](mailto:jarrett@teckmeyerfinancial.com)

### **Customers' Access to Funds and Securities**

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, RBC. 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 Web site that customers may access their funds and securities by contacting Matt Machaiek at 1-612-371-2902 or Investor Connect Client Support at 1-800-933-9946. The firm will make this information available to customers through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

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

Our firm maintains its primary hard copy books and records at the main office, which is located at 11104 John Galt Blvd. Electronic copies of statements and other reports are maintained by our clearing firm and the mutual funds that we conduct business with. Electronic files such as spreadsheets, Word documents, and our database are maintained on our server. Those files are backed up weekly. If something happens to the employees of Teckmeyer Financial, questions about the files on our server can be directed to Brandon Gordon of Run Networks at (402) 397-1123.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them with help from RBC and the mutual fund companies that we do business with. For the loss of electronic records, we will again work with RBC, the mutual fund companies we do business with and Run Networks in order to retrieve the most recent back up copy made.

### **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, voice mail, e-mail, and cell phones. In addition, we will access our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

#### **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 as spelled out in FINRA rules and regulations.

## **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 customer accounts, access to customer accounts, and the delivery of funds and securities. More specifically, these systems include our phone system, internet access, beta-link and DST Vision.

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 conveying those orders to our clearing firm or directly to those mutual fund or variable annuity companies that we do business with. 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 present 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 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 on an annual basis.

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 4 hours; and resumption time of same business day.

### **Our Firm's Mission Critical Systems**

**Order Taking**—Currently, our firm receives orders from customers via telephone or in person with the client. 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. Customers will be informed of the alternatives by phone, in person, and when possible, by e-mail. If necessary, we will advise our customers to place orders directly with our clearing firm.

**Order Entry**—Currently, our firm enters orders in two ways: 1) by recording them on paper and then calling the orders in to our clearing firm (Trade Desk Number: 1-877-757-2517), or 2) by entering them electronically through Betalink. In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available. In the event of an external SBD, we will maintain the order in 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.

**Order Execution**—Our order execution is performed by our clearing firm.

**Other Services Currently Provided to Customers**—In addition to those services listed above in this section we also provide additional services to our customers. In the event of an internal or external SBD, we will be able to provide those services at an alternate location and/or using alternate means of communication.

### **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, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

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

### **Customers**

We now communicate with our customers using 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.

## **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. All phone numbers are listed in this report. We have identified persons, noted below, who live or work near each other and may reach each other in person:

### Lincoln

Tom Teckmeyer  
John Kroeker  
Joel Hietbrink  
Jarrett Suddarth

### Omaha

Sara Barber  
Cindy Nilius  
Doug Gustin  
Scott Taylor

The person to invoke use of the call tree is Tom Teckmeyer.

## **Regulators**

We are currently members of FINRA. 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.

## **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 suppliers are: RBC, Cox and Run Networks.

### **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: Wells Fargo (4725 S. 84<sup>th</sup> Street, 402-935-2946). The bank maintaining our Proprietary Account of Introducing Brokers/Dealers (PAIB

account) is also Wells Fargo. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately.

### **Regulatory Reporting**

Our firm is subject to regulation by the Nebraska Department of Banking and Finance, The Financial Industry Regulatory Authority, and the Securities and Exchange Commission. 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.

### **Disclosure of Business Continuity Plan**

We provide in writing a BCP disclosure statement to customers at account opening. We also post the disclosure statement on our Web site and mail it to customers upon request. Our disclosure statement is attached.

### **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, on December 1, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

### **Senior Management 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.

Signed: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_