

# wakeful

BUSINESS CONTINUITY PLAN

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## Business Continuity Plan (BCP)

Oaks Valley Financial Services, LLC · d/b/a Wakeful

March 2026

CRD# 144640

1200 Brickell Ave, Suite 1700B, Miami, FL 33131

Phone: (305) 582-3796 · [advisor@wakeful.io](mailto:advisor@wakeful.io)

## I. EMERGENCY CONTACT PERSONS

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Our firm's two emergency contact persons are listed below. These names will be updated in the event of a material change, and our CCO will review them within 17 business days of the end of each quarter.

### **Atilio Bodini — CEO**

(305) 582-3796 · atilio@wakeful.com.ar

### **Oscar Culari — COO**

+5411-5485-6318 · advisor@wakeful.io

## II. FIRM POLICY

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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.

### **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. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

### **B. Approval and Execution Authority**

Atilio Bodini, CEO, is responsible for approving the plan and for conducting the required annual review. Atilio Bodini, CEO, and Oscar Culari, COO, have the authority to execute this BCP.

### **C. Plan Location and Access**

Our firm will maintain copies of its BCP plan, annual reviews, and any changes made to it for inspection. An electronic copy will be stored on our electronic storage system Microsoft OneDrive.

## III. BUSINESS DESCRIPTION

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Oaks Valley Financial Services, LLC d/b/a "Wakeful" conducts business as a state-registered investment adviser. Services include but are not limited to developing and implementing investment plans for clients as an advisor. We do not act as a broker-dealer. Our firm does not hold client funds or securities. All client assets are held at a qualified custodian. Oscar Culari (CRD# 7521994) serves as the firm's sole Investment Adviser Representative (IAR) and is also a Registered Representative of ACP Securities, LLC, a FINRA-registered broker-dealer.

## IV. OFFICE LOCATIONS

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1200 Brickell Ave, Suite 1700B, Miami, FL 33131 · (305) 582-3796

## V. ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

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In the event of an SBD, we will move our staff from affected offices to:

Juana Manso 1750, 5 C, ala norte  
 Ciudad Autónoma de Buenos Aires, Argentina  
 +5411-5485-6318

**VI. CUSTOMERS' ACCESS TO FUNDS AND SECURITIES**

Our firm does not maintain custody of customers' funds or securities. All client assets are held at custodian brokers. Clients receive statements at a minimum of once each quarter from each custodian, which also provides annual notices of the firm's BCP and contact information.

INTERACTIVE BROKERS	PERSHING LLC (VIA ACP SECURITIES)
One Pickwick Plaza, Greenwich, CT 06830	One Pershing Plaza, 10th Floor, Jersey City, NJ 07399
1-888-919-0022	1-201-413-3333
www.interactivebrokers.com	pershing.com/disclosures

In the event that SIPC determines that any custodian is unable to meet its obligations to customers, SIPC may seek to appoint a trustee to disburse the custodian's assets. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

**VII. DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)**

Our firm maintains books and records, including electronic records, through Microsoft OneDrive and Google Drive at 1200 Brickell Ave, Suite 1700B, Miami, FL 33131. Oscar Culari, COO, phone (5411) 5485-6318, is responsible for the maintenance of these books and records.

In the event of an SBD that causes the loss of paper records not stored electronically, we will physically recover client records from the custodian firm. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will work with Microsoft to provide the backups.

**VIII. FINANCIAL AND OPERATIONAL ASSESSMENTS**

**A. Operational Risk**

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Communications options will include telephone, telephone voice mail, and email. In addition, we will retrieve our key activity records as described in Section VII.

**B. Financial and Credit Risk**

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and service our clients. We will contact our custodian firm, clients, and critical banks to apprise them of our financial status. If we determine we may be unable to meet our obligations to 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.

**IX. MISSION CRITICAL SYSTEMS**

Our firm's "mission critical systems" are those that ensure prompt and accurate access to client accounts and

records, and processing of securities transactions. These systems include those of our custodian firms, which provide custody services, transaction processing, maintenance of customer accounts, access to customer accounts, and delivery of funds and securities.

We have primary responsibility for establishing and maintaining our business relationships with our clients, and have sole responsibility for our mission critical functions. Our custodian firms represent that they will advise us of any material changes to their business continuity plan that might affect our ability to maintain our business.

**X. ALTERNATE COMMUNICATIONS**

**A. Customers**

We communicate with our customers using telephone, email, U.S. mail, and in-person visits. In the event of an SBD, we will use the means closest in speed and form to our previous communication method.

**B. Employees — Call Tree**

We will employ a call tree so that senior management can reach all employees quickly during an SBD. The person to invoke the call tree is Atilio Bodini, CEO.

CALLER	RECIPIENT
Atilio Bodini	Oscar Culari
Oscar Culari	Atilio Bodini
Atilio Bodini	Dana Baravaglio
Oscar Culari	Martín Stea
Martín Stea	Facundo Giets
Oscar Culari	Inés Vidart
Oscar Culari	Laura Stieben
Atilio Bodini	Laura Stieben

**C. Regulators**

We are currently registered with the Florida Office of Financial Regulation (OFR), the New Mexico Regulation and Licensing Department (RLD) Securities Division, and the Wyoming Secretary of State Securities Division. In the event of an SBD, we will assess which means of communication are still available and use the means closest in speed and form to our previous method.

**XI. CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES**

**A. Business Constituents**

We have assessed the extent to which we can continue our business relationship with critical business constituents in light of an SBD and will quickly establish alternative arrangements if needed. Major external suppliers: Not Applicable.

**B. Banks**

BANK	ACCOUNT NUMBER
Citibank N.A.	3290404345

JPMorgan Chase Bank N.A.

957239525

**C. Counter-Parties**

We have assessed our ability to carry out transactions with critical counter-parties in light of an SBD. Where transactions cannot be completed, we will work with our custodian firm or contact those counter-parties directly to make alternative arrangements as soon as possible.

**XII. REGULATORY REPORTING**

Our firm is subject to regulation by the Florida OFR, the New Mexico RLD Securities Division, and the Wyoming Secretary of State Securities Division. We file reports using paper copies in the U.S. mail, email, and the Internet. In the event of an SBD, we will check with our respective state regulators to determine which means of filing are available. If we cannot contact our regulators, we will continue to file required reports using all available communication means.

**XIII. DISCLOSURE OF BUSINESS CONTINUITY PLAN**

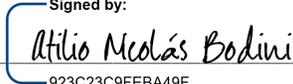
We disclose in writing a summary of our BCP to customers at account opening and annually. We also mail it to customers upon request. Our summary addresses the possibility of a future SBD, how we plan to respond, our back-up facilities and arrangements, and our expectation to resume business within one business day of a disruption. Our summary disclosure is included in Attachment A.

**XIV. UPDATES AND ANNUAL REVIEW**

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

**XV. SENIOR MANAGER APPROVAL**

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Signed:  \_\_\_\_\_  
Signed by:  
 923C23C9FEBA49F...

**Atilio Bodini**

Title: CEO

Date: March 03, 2026

**Attachment A. BCP SUMMARY DISCLOSURE TO CLIENTS**

In the event of a disruption that affects our firm's ability to communicate and do business, clients are advised to contact the custodian firm holding their investment assets. Currently, all brokerage assets are custodied at:

INTERACTIVE BROKERS	PERSHING LLC
One Pickwick Plaza, Greenwich, CT 06830	One Pershing Plaza, 10th Floor, Jersey City, NJ 07399
1-888-919-0022	1-201-413-3333
www.interactivebrokers.com	pershing.com/disclosures

Our firm has established back-up facilities and arrangements to deal with SBDs and will make every effort to contact customers should an SBD occur. Our firm expects to be able to resume business activity after an SBD within one business day.