

Item 1 - Cover Page

Star LLC dba Alta Financial Group
Form ADV Part 2A – Brochure and Form
ADV Part 2B – Brochure Supplement
Updated: December 26, 2017
Effective: January 1, 2018

348 S. Clover Ave.
San Jose, CA 95128
415-999-7046
www.afgusa.com

This Brochure provides information about the business practices of Alta Financial Group, Inc. and the qualifications of its advisors. It is available, free of charge, to all clients and prospective clients of the firm by contacting Mr. Hooman Altafi (415) 999-7046 or by visiting our website at www.afgusa.com.

The purpose of this brochure is to provide you with information about the firm that may help you decide on whether to retain our services.

Alta Financial Group (“Alta”, “We”, or “Us”) is a Registered Investment Advisor in the State of California. The information in this Brochure has not been approved or verified by the State of California or by the Securities and Exchange Commission or by any other State securities authority, and registration as an investment advisor does not imply any specified level of skill or training.

Item 2 – Material Changes

The Form ADV Part 2A and 2B will be made available each year to all clients by February 1st, and will be offered to prospective clients prior to engagement of our services, along with our firm's Investment Management Agreement. We will further provide clients and prospective clients with a new brochure as necessary based on material changes to or new information about our firm. Material changes for this annual update are as follows:

On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law and in doing so, raised the threshold for advisor registration with the SEC from \$30 million under management to \$100 million under management.

Currently, Alta is registered with the State of California.

- Mr. Hooman Altafi has returned as President and Chief Investment Advisor after having served over two years with AIG / VALIC as an Investment Advisor.

Item 3 -Table of Contents for Form ADV Part 2A

Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 -Table of Contents for Form ADV Part 2A.....	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	5
Item 6 – Performance-Based Fees and Side-By-Side Management	6
Item 7 – Types of Clients.....	6
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	6
Item 9 – Disciplinary Information	6
Item 10 – Other Financial Industry Activities and Affiliations	7
Item 11 – Code of Ethics	7
Item 12 – Brokerage Practices	7
Item 13 – Review of Accounts.....	8
Item 14 – Client Referrals and Other Compensation.....	9
Item 15 – Custody	9
Item 16 – Investment Discretion	10
Item 17 – Voting Client Securities.....	10
Item 18 – Financial Information.....	10
Item 19 – Requirements for State-Registered Advisers.....	11

Item 4 – Advisory Business

A. Advisory Firm

Star LLC, dba Alta Financial Group is an Investment Advisory and Wealth Management Firm founded to help individuals and institutions with asset management and investment planning.

B. Advisory Services

Investment Management

ALTA provides investment management services that include the development of an investment policy that is unique to each client, presentation and implementation of investment recommendations, and ongoing supervision and management of client investment assets. Other services include tax-related management and reporting, periodic rebalancing, semi-annual and annual reviews with clients, quarterly newsletter and periodic market commentary communications, and annual performance reporting. ALTA does not provide tax or legal services.

Financial Planning

Financial planning services are not a focus of our practice; however, this service may be offered to investment management clients at no additional charge.

ALTA may also from time to time offer stand-alone planning services charged at an hourly rate.

C. Customized Portfolios

ALTA tailor's individual client portfolios in the following ways:

- We review a client's personal risk tolerance and time horizon, and then allocate investments among stocks, bonds and cash to optimize the trade-off between risk and return for that client.
- We review a client's liquidity needs to make sure they have sufficient cash on hand to fund either regular or unexpected portfolio withdrawals.
- We gather information about each client's tax situation to make sure that we are achieving the best possible investment returns on an after-tax basis.
- We make accommodations for investments that a client may hold that is outside of our normal set of recommendations. We also make accommodations for those clients who wish to engage in Socially Responsible Investing by researching and using SRI-strategy mutual funds.

D. Wrap Fee Programs

ALTA does not participate in Wrap Fee programs.

E. Discretionary Management

ALTA manages most client accounts on a discretionary basis, which means that clients do not approve transactions prior to their execution. As of this update, 100% of client accounts are discretionary. As of the date of this AVD, we have approximately \$5,000,000.00 in assets under management.

Item 5 – Fees and Compensation

A. Advisory fees are charged quarterly in arrears. The fee is calculated by taking the quarter-end portfolio value, assigning the following rate schedule, and then dividing by 4 to arrive at a quarterly fee amount. The annual rates are:

<u>Assets Under Management</u>	<u>Annual Fee</u>
\$0 - \$1,000,000	1.00%, plus
\$1,000,000 - \$3,000,000	0.75%, plus
\$3,000,000 – and above	0.50%, plus

The minimum fee for new clients is \$10,000 per year. Fees are negotiable. The specific way fees are charged by ALTA is established in the client's Investment Management Agreement. Lower fees for comparable services may be available from other sources.

We may be retained by an employer to provide investment advisory services to participants of the employer sponsored retirement plans. In these cases, our advisory fee on a participant level basis would be 0.50% annually, and the minimum fee for new clients is waived.

B. Clients may elect to pay fees directly by cash or check, or authorize ALTA to automatically debit fees from client accounts.

C. The fees listed above are in addition to any fees charged by the account custodian or costs associated with the implementation of the investment plan. These costs may include brokerage commissions, transaction fees, mutual fund operating expenses, custodial fees, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. ALTA does not receive any portion of these commissions, fees or costs, and seeks to minimize them on clients' behalf whenever possible.

Item 12 further describes the factors that ALTA considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

D. Investment Advisory contracts may be terminated at any time for any reason with written notice at the will of the client or Alta Financial Group, Inc. ALTA will refund any prepaid, unearned fees, and any earned but unpaid fees will be promptly due and payable.

Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee,

...Item 5

calculated based on a 30-day month, 360-day year calendar. Refunds will be paid by check and sent via U.S. mail within 30 days of receipt of termination notice.

E. ALTA and its advisors do not receive compensation from the sale of securities or any compensation from broker dealers, mutual fund companies, or other investment related activities, other than client fees as described above. Please see item 10 for more information.

Item 6 – Performance-Based Fees and Side-By-Side Management

ALTA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

ALTA provides investment management and financial planning services to high net worth individuals, families, trusts, corporate pension and profit-sharing plans, and charitable institutions.

ALTA does not have a mandatory minimum account size. Rather, we charge a minimum annual fee, which is currently \$10,000. This minimum fee may be negotiable for those clients with less than \$1 million under management.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

ALTA follows the principles of asset allocation to construct broadly diversified investment portfolios that are designed for the long-term and are based on each client's personal circumstances (goals, time horizon, risk tolerance, tax considerations). We strive to keep expenses and investment costs low, and primarily use no-load, low-cost mutual funds and exchange-traded funds, individual stocks, options, and Alternative Investments, when implementing investment portfolios. We seek to minimize the effect of taxes through asset location and tax-efficient investment vehicles.

Although we do a great amount of work to determine in advance a client's risk tolerance, it is important to understand that investing money involves many risks, including the risk of loss of principal, and clients should be prepared to bear this risk. We cannot guarantee any investment outcome.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would-be material to your evaluation of ALTA or the integrity of our management.

- ALTA has received no legal or disciplinary action.

Item 10 – Other Financial Industry Activities and Affiliations

A. We have no material relationship or arrangement with any of the following: broker-dealers, municipal or government securities dealers, investment companies or other pooled investments, closed-end investment companies or unit investment trusts, hedge funds or offshore funds, other investment advisors or financial planners, futures commission merchants, commodity trading advisors, banking or thrift institutions, accountancy firms, law firms or insurance agencies.

B. From time to time ALTA may give gifts valued at less than \$50 in value to clients or colleagues based on an ongoing relationship; however, ALTA does not participate in any formal compensation- for-referrals arrangement.

Item 11 – Code of Ethics

ALTA has adopted a Code of Ethics for the firm describing our high standard of business conduct and fiduciary duty to our clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at ALTA must acknowledge the terms of the Code of Ethics annually, or as amended.

The owners and advisors of ALTA follow the same investment strategy for their personal assets as is recommended to clients and, thus, have ownership interest in many of the same mutual fund investments. Employee trading is continually monitored to reasonably prevent conflicts of interest between ALTA and its clients.

ALTA's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting
Mr. Hooman Altafi at (415) 999-7046.

Item 12 – Brokerage Practices

ALTA may require that clients establish brokerage accounts with Interactive Brokers, a registered broker-dealer, member SIPC, and/or TD Ameritrade Institutional, Division of TD Ameritrade, Inc., member FINRA/SIPC (Custodians) that maintain custody of clients' assets and to effect trades for their accounts. ALTA is independently owned and operated and not affiliated with Interactive Brokers or TD Ameritrade Institutional, who provides ALTA with access to their institutional trading and custody services. ALTA does not receive a fee or compensation from either Custodian. The Custodians makes available to ALTA other products and services that benefit ALTA but may not benefit our clients' accounts. Some of these other products and services assist ALTA in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), provide research, pricing information and other market data, facilitate payment of ALTA's fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of ALTA's accounts. While as a fiduciary, ALTA endeavors to act in its clients' best interests, our requirement that clients maintain their assets in accounts at either Custodian is not based in

part on the benefit to ALTA of the availability of some of the foregoing products and services and solely on the nature, cost or quality of custody and brokerage services provided by the Custodians.

ALTA does not receive or utilize soft dollars, nor do we enter any soft-dollar arrangements with broker-dealers. We do not receive compensation directly or indirectly from any source other than fees paid to us by our clients. We do not receive commissions of any sort, nor does ALTA receive a share of any fees collected by account custodians or mutual fund companies.

Item 13 – Review of Accounts

A. All client accounts are reviewed per a set schedule, as follows:

Daily Review: our primary custodians provides ALTA with a daily electronic data file containing all client account transactions and positions. Accounts are monitored and reconciled to the custodian daily.

Semi-Annual Review: All accounts are reviewed every six months in relation to their target portfolio weights, market movements, changes in fund recommendations, and shifts in target asset allocations.

Annual Review: In addition to the above, we seek to meet with clients at least once per year to stay informed regarding their personal situation and to determine whether the established Investment Policy remains appropriate. All portfolios are rebalanced at least once per year.

Upon Client Request: In addition to the above, we periodically review client accounts in relation to new information presented by the client or to provide information requested by the client.

All reviews, whether initiated by Client or Advisor, are performed by Mr. Hooman Altafi, president and Chief Investment Advisor.

B. Factors that may trigger a review in addition to those listed above include withdrawals from a client portfolio, additions to a client portfolio, changes to our tactical investment strategies, changes to our approved list of mutual funds, and extreme market conditions that would trigger a rebalancing of the portfolio prior to the next six-month review date.

C. All Investment Management clients receive monthly account position and transaction statements from the account custodian. In addition, ALTA provides quarterly consolidated performance reports, either verbally or in writing, along with a reporting of fees charged. Investment Management clients also receive annual and since-inception performance reports at their annual review date. Clients may elect to have reports from the custodians and ALTA delivered electronically (via e-mail and website access) or via U.S. mail.

Item 14 – Client Referrals and Other Compensation

It is ALTA's policy that the firm will not engage in any compensation arrangements for client referrals.

Item 15 – Custody

Clients receive at least quarterly statements from the custodian that holds and maintains

clients' investment assets. Many clients elect to receive these statements electronically, which requires them to establish a user ID and password to www.Interactivebrokers.com and/or www.advisorclient.com to logon to their respective custodian's websites.

ALTA urges all clients to carefully review these statements and compare the custodian's official custodial records to the account information's that we provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

In addition to comparing account values and securities transactions, ALTA urges clients to review our billing statements sent each quarter with the amounts and number of fees deducted from client accounts.

Item 16 – Investment Discretion

ALTA manages most client accounts on a discretionary basis, which means that the client does not approve transactions prior to their execution.

At the establishment of the advisory relationship, we collaborate with new clients on the preparation of a client-specific investment policy and then draft an Investment Policy Statement, which describes the client's personal financial situation, long-term return objectives, risk-tolerance, and any special constraints on the portfolio, such as significant tax exposure, a need for liquidity, or a desire for socially responsible screening. The Investment Policy Statement also describes our investment approach and contains an allocation of assets among cash, bonds and stocks from which we will not diverge beyond set tolerance levels (usually 5%). We will only invest in mutual funds and exchange-traded funds and individual stocks – any other types of securities, such as individual bonds, stock options, etc. will be with client agreement and documented in the Investment Policy Statement prior to the execution of any transactions.

Because of the above policies, decisions made by us are typically limited to the specific securities to be bought or sold, and the amount and timing of those transactions.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, ALTA does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for all securities maintained in client portfolios. ALTA may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. ALTA has no financial

commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

- ALTA does not collect management fees, of any amount, six months or more in advance.

Item 19 – Requirements for State-Registered Advisers

A. Education Standards and Business Background

Advisory persons associated with ALTA must, at a minimum, possess a Bachelor's degree and/or five years of appropriate business experience, in addition to all required licenses.

Hooman Altafi's Education and Licenses

- Registered Investment Advisor CRD# 2165578
- Series 6, Investment Company Products/Variable Contracts
- Series 65, Investment Adviser Law
- Series 63, Securities Agent State Law
- Series 22, Direct Participation Programs Representative
- California Real Estate Broker License #01152507
- California Insurance License #0A93431
- NMLS Mortgage License #245319
- Associates Degree, College of San Mateo

Hooman Altafi's Most Relevant Business Background:

- President and Chief Investment Advisor, Alta Financial Group since 2003.
- Investment Advisor, AIG / VACIC 2014 - 2016
- Wells Fargo Securities, Mutual Fund Trading Desk 1994 – 1996
- Charles Schwab, In-Branch Investment Advisor 1996 - 1997
- America Express Financial Advisors, 1991 - 1992

B. Hooman Altafi is also a licensed California Real Estate Broker, National and State Licensed Mortgage Broker, and hold a California Life, Health, and Disabilities Insurance licenses and may be compensated for acting as broker or otherwise involved in transactions that require the use of these licenses.

C. Hooman Altafi does not receive performance-based fees or commissions.

D. Hooman Altafi has not been involved in any event related to wrongdoing or dishonest unethical practices, nor been found liable in a civil, self-regulatory organization or administrative proceeding.

E. Hooman Altafi does not have any relationships or arrangements with issuers of securities not listed in Item 10A.

F. All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding ALTA and our representatives which could be reasonably expected to impair the rendering of unbiased and objective advice.

Form ADV Part 2B – *Brochure Supplement*

Mr. Hooman Altafi

Star LLC, dba Alta Financial Group

CRD #145001

348 S. Clover Ave
San Jose, CA 95128
(415) 999-7046

Updated:
December 26, 2016
Effective: January 1, 2017

This Brochure Supplement provides information about Mr. Hooman Altafi that supplements the Alta Financial Group Brochure. You should have received a copy of that Brochure. Please contact Hooman Altafi at (415) 999-7046 if you did not receive Alta Financial Group's Brochure or if you have any questions about the contents of this supplement. Both parts of the brochure are available to download from our website: www.afgusa.com

Additional information about Alta Financial Group is available on the FINRA website at <http://brokercheck.finra.org/>

Item 1- Educational Background and Business Experience

Advisory persons associated with Alta Financial Group must, at a minimum, possess a Bachelor's degree and/or five years of appropriate business experience, in addition to all required licenses.

Hooman Altafi's Education and Licenses

- Registered Investment Advisor CRD# 2165578
- Series 6, Investment Company Products/Variable Contracts
- Series 65, Investment Adviser Law
- Series 63, Securities Agent State Law
- Series 22, Direct Participation Programs Representative
- California Real Estate Broker License #01152507
- California Insurance License #0A93431
- NMLS Mortgage License #245319
- Associates Degree, College of San Mateo

Hooman Altafi's Most Relevant Business Background:

- President and Chief Investment Advisor, Alta Financial Group since 2003.
- Investment Advisor, AIG / VACIC 2014 - 2016
- Wells Fargo Securities, Mutual Fund Trading Desk 1994 - 1996
- Charles Schwab, In-Branch Investment Advisor 1996 - 1997
- America Express Financial Advisors, 1991 - 1992

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

- No information is applicable to this Item.

Item 4- Other Business Activities

Alta Financial Group provides discounted commercial and real estate services to its clients. Hooman Alafi is a licensed real estate broker, licensed mortgage loan originator, and licensed independent insurance agent.

Star LLC also provides management consulting services to corporate clients, which include, but may not be limited to: Group and Personal Life, Health, Disability Insurance, and other employee benefit services, as well as corporate information technology consultation services.

Item 5- Additional Compensation

For Advisory services, Hooman Altafi does not receive commissions, performance based fees or any other compensation other than fees paid directly by clients to Alta Financial Group.

Hooman Altafi does receive compensation from acting as the broker or agent on real estate, mortgage, and insurance transactions.

Hooman Altafi does receive compensation for Information Technology consultation services.

Item 6 - Supervision

Hooman Altafi is the Member and Manager of Star LLC. Star LLC is a single member LLC that does business as Alta Financial Group.

Item 7- Requirements for State-Registered Advisers

- Hooman Altafi has not been involved in any arbitration or judiciary proceedings.
- Hooman Altafi has not been the subject of a bankruptcy petition.