

Alta Financial Group

Business Continuity Plan

1. Policy:

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding firm property, and quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. Events may occur that would make us unable to continue our business, in such a case we will assure customers prompt access to their funds and securities.

2. Business Description:

Our firm conducts business in equity, fixed income, and derivative 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. All transactions are sent to our clearing firm, which executes, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only retail customers and institutional customers. We do not engage in any private placements.

Depending on your level of account and services we offer, your accounts are held with:

(please refer to your account statement as to which clearing firm is servicing your accounts)

TD Ameritrade: www.advisorclient.com 1-800-431-3500

Interactive Brokers: www.interactivebrokers.com 1-877-442-2757

Fidelity Institutional: www.401k.com 1-888-503-7526

3. Licensed Office Location:

Address: 348 S. Clover Ave., San Jose, CA 95128

4. Customer Access To Funds And Securities:

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firms, listed in section 2 above. In the event of an internal or external SBD, if cell phone service is available, we will take customer instructions and contact our clearing firm on their behalf, and if our Web access is available, our firm will post on our website that customers may access their funds and securities by contacting the clearing firms directly.

5. Data Backup and Recovery:

All Customer related material, as in the Investment Advisory Agreement, “wet-singed” documents, applications, etc. will be scanned and uploaded to a third-party managed Cloud based storage system that will be secured, backup by, and initiated by the third-party.

All regulatory required documents, company bank statement and reconciliation reports are also kept at third-party managed cloud storage system.

Currently, Alta Financial Group uses: Box.com and Microsoft’s OneDrive for file storage, and Gmail contacts for client contact storage.

Recovery times are dependent on the third-party provider and are subject to vagaries of the internet. However, the vendors listed above have been proven to have above industry “up time” and accessibility.

We routinely monitor the availability of the cloud services by using the services providers own support site and a third party, uptime.com

<https://uptime.com/box.com> <https://status.box.com/>

<https://uptime.com/live.com> <https://portal.office.com/servicestatus>

6. Mission Critical Systems:

The only “in-house” system currently in use that would classify as “Mission Critical” is Mr. Hooman Altafi’ s laptop. Currently a Microsoft Surface Pro 3 Encrypted with BitLocker

The laptop is fully imaged once per month (a complete backup of the laptop, including the operation system) then this image is restored to another laptop and tested. Once the receiving laptop has passed the recovery test, the image file is destroyed with a low-level format for security purposes.

The secondary laptop is kept off-site, in a secure location.

Our clearing firms, listed in section 2 above, must maintain their own Business Continuity plan, per FINRA regulations. Please refer to the respective clearing firm to review their plans.

Our firm relies on our clearing firms, listed in section 2 above, to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

7. Client Communication:

Alta Financial Group does not meet clients at our office location. We go to your location of choice, when it’s most convenient for our clients.

We do not keep any client information at our office location

All client voice communication is done solely via mobile phone. The client contact database is backup to Gmail- contacts and is not dependent on the physical availability of the phone hardware. The contacts can be restored at any time, to any mobile phone, and are also available on gmail.com

Alta Financial Group maintains two backup mobile phones for these purposes, at all times.

8. Financial and Operational Assessment:

In the case of an SBD event, 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 the event will determine the means of alternative communication, the communications options we will employ will include our website, voice mail, email, etc. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery

Any Substantial Business Disruption event should not affect our ability to continue to fund our operations and remain in business, as we have no significant operational expenses, employees, or other financial obligations that would require us to request additional financing from our bank or other credit sources.

In the unlikely event that we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps to remedy the situation.

9. Regulatory Reporting:

Our firm is subject to regulation by the California Department of Business Oversight, Broker-Dealer & Investment Adviser Division.

We file reports with our regulators using the website: www.finra.org

In the event of an SBD that would make www.finra.org not available, we will check with the CA DBO, SEC, FINRA and other regulators to determine which means of filing are still available to us, and use the to file our required reports.

10. Update of and Disclosure of this Business Continuity Plan:

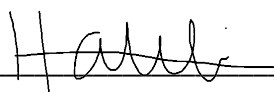
We will review and update this document as needs, and at least once per year in accordance with our business practices and client communication standards, new technologies available, and other factors that will make our better services our clients in case of and event.

A copy of this document, and any subsequent updates, will be kept in the clients personal and secure folder on Box.com and updated to the "licensing" section of our website: www.afgusa.com

11. Managerial 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.

Hooman Altafi
President, Alta Financial Group



January 1, 2016