

Integral Financial LLC – Business Continuity Plan

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This “Business Continuity Plan” has been created to meet the requirements described in FINRA Rule 4370. This Business Continuity Plan is reasonably designed to enable our firm to meet its obligations to customers in the event of a Significant Business Disruption.

Authorized Approval Signature: _____

Printed Name & Title: Frank Ho, President

Date: _____

This Plan is effective from the date approved until the date of its authorized revision, update or replacement (see below).

Date this Plan was no longer effective (date of revision, update or replacement): _____

Recordkeeping: Discard after _____ (date three years from termination of use).

Introduction

On April 7, 2004, the Securities and Exchange Commission approved NASD Rule Series 3500 dealing with emergency preparedness. On December 14, 2009, these Rules were converted to FINRA Rule 4370 as part of the FINRA Rule Consolidation process. Rule 4370 requires each member to create and maintain a Business Continuity Plan (BCP) that identifies procedures relating to an emergency or Significant Business Disruption (SBD) that are “reasonably designed to enable the member to meet its existing obligations to its customers.” In addition, the plan must address the firm’s existing relationships with other members and counter-parties. This plan must be promptly made available to the FINRA staff upon request.

Rule 4370(b) requires that each member review its plan at least annually to determine if any changes are needed and update its plan more frequently in the event of any material change to its operations, structure, business or location.

The plan should reflect the firm’s business and operations. Therefore, the requirements of the plan, as identified in Rule 4370, are flexible and should be tailored to the firm’s size and needs.

However, at a minimum, Integral Financial LLC's plan must address the following areas:

- Data back-up and recovery (hard copy and electronic);
- All mission critical systems;
- Financial and operational assessments;
- Alternate communications between customers and the member;
- Alternate communications between the member and its employees;
- Alternate physical location of employees;
- Critical business constituents, banks, and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How the member will assure customers’ prompt access to their funds and securities in the event that the member determines that it is unable to continue its business.

Each firm is required to only address the elements applicable to its business, but the plan must contain an explanation if any element above is not included.

Rule 4370 requires each member to designate two individuals as emergency contacts that FINRA may contact in the event of a significant business disruption. Each contact must be a registered principal or member of senior management. However,

- If the member has only one principal but has other employees, the second contact should be another firm employee, or
- If the firm has only one principal and no other employees, the second contact may be someone who has knowledge of the firm’s business, such as an accountant, attorney, etc.

Rule 4370 also requires that each member enter this information into FINRA’s Contact System (FCS) at https://regfiling.finra.org/contacts/ncs_contacts.aspx and that required changes are made promptly.

Emergency Contact Persons

Integral Financial LLC has designated the following individuals to act as contact persons for the firm as required under Rule 4370:

Primary Contact

Name, Title: Frank Ho, President

Address: 1072 S De Anza Blvd, Suite A205, San Jose, CA 95129

Telephone Number: (408) 996-1118

Secondary Telephone Number: (408) 996-1618

Fax Number: (408) 996-1116

E-mail Address: frank@infi.biz

Secondary Contact:

Name, Title: Enid Choi, Vice President

Address: 1072 S De Anza Blvd, Suite A205, San Jose, CA 95129

Telephone Number: (510) 793-8883

Secondary Telephone Number: (510) 573-2363

Fax Number: (510) 556-5918

E-mail Address: enid@infi.biz

These contacts will be reported through FINRA's Contact System. This system may be accessed directly at https://regfiling.finra.org/contacts/ncs_contacts.aspx or through the Firm Gateway at www.finra.org/firmgateway and must be updated in the event of a material change. In addition, Integral Financial LLC's Executive Representative or his/her written designee must review and update this information, if necessary, within 17 business days of the end of the calendar year. The Executive Representative or his/her designee will also ensure that contact information is updated promptly if changes occur at any time during the year.

Executive Representative:

Integral Financial LLC's Executive Representative is Frank Ho.

Disaster Recovery Coordinator/Team:

The Company has designated Frank Ho, President, as the “Disaster Recovery Coordinator” (“Coordinator”). In his/her absence, Enid Choi, Vice President, will assume his/her responsibilities.

The “Disaster Recovery Coordinator” has the responsibility to make an immediate preliminary assessment of the nature and extent of the disruption by assessing the following: electricity supply; condition of computer network/phones; damage to the building; HVAC in extreme weather; and other hazards.

If the Coordinator determines that personnel should evacuate the affected location(s), he/ she must make an announcement to all personnel as to appropriate procedures. The announcement may be given via personal contact, e-mail, intercom or other methods as appropriate given the systems available; the size and location of the staff; and the size of the office or building. This announcement should be short and concise, should calmly identify the situation and should provide instructions to employees on how to respond. This announcement should be repeated as often as necessary to avoid confusion and to ensure all employees are aware of the situation. After ensuring the physical safety of Company personnel, the Coordinator must then implement this BCP.

If the situation does not merit evacuation, steps should be taken to alert designated persons of necessary actions to facilitate ongoing operations in the face of limited disruption. In this case, the Coordinator will determine which, if any, procedures in this BCP should be implemented.

In the event, the SBD has directly affected other areas of the building but has not directly impacted the Company’s office, the Coordinator will contact building security or emergency personnel for instructions on how the Company should respond and proceed accordingly.

Firm Policy

Integral Financial LLC'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 its customers to transact business. In the event that it is determined the firm is unable to continue its business, the firm will assure customers prompt access to their funds and securities.

Significant Business Disruptions (SBDs):

Integral Financial LLC's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Company’s ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services. The Company’s response to an external SBD will rely more heavily on other

organizations and systems, especially on the capabilities of the clearing firm or the product sponsors, federal emergency authorities, local officials and utility companies.

Approval and Execution Authority:

Frank Ho, President, a registered principal, is responsible for approving the plan and for conducting the required annual review.

Frank Ho, has the authority to execute this BCP.

Plan Location and Access:

Integral Financial LLC will maintain copies of its BCP plan, a record of the firm's annual reviews, and the changes that have been made to the BCP for inspection by regulators. A hard copy of the Company's Plan is located in its main business location and may be accessed by contacting Frank Ho, (408) 996-1118, frank@infi.biz.

An electronic copy of the Company's plan is located on the Company's server in a file named DLINK-006148 in the Integral Limited Share/Business Continuity Plan. A back-up copy of this electronic file is maintained at Fremont Office.

A copy of the BCP will be provided to FINRA District Office #1 located in San Francisco, California upon request.

Business Description

Integral Financial LLC conducts business in equity securities, fixed income securities, options, derivatives, mutual funds and ETFs. The Company is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, the Company does not hold customer funds or securities. Integral Financial LLC accepts and enters orders. All transactions are sent to the clearing firm, which executes our orders, compares them, allocates them, clears and settles them. The Company's clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

The Company's clearing firm is Hilltop Securities Inc., 1201 Elm Street, Suite 3500, Dallas, TX 75270, (214) 859-1800, www.hilltopsecurities.com, and our contact person at that clearing firm is Cole Zamboanga, (214) 859-1349, cole.zamboanga@hilltopsecurities.com. Hilltop Securities Inc. has given us the following alternative contact in the event the primary contact cannot be reached: Chris Cervantes, (214) 859-6645, chris.cervantes@hilltopsecurities.com.

Integral Financial LLC conducts business on a subscription basis in mutual funds and variable insurance products. The Company does not hold customer funds, securities or customer accounts. Integral Financial LLC accepts applications from customers for the purchase of these products and sends them directly to the product sponsor for execution and settlement. The product sponsor maintains all the customer accounts, and delivers funds and securities upon the customer's request.

Our firm services retail individual and accredited individual customers.

Office Locations

The Company or its registered personnel currently operate from the following locations:

Type of Location, Registered or Unregistered	Address and Main Phone Number	Located in a Personal Residence? (Y or N)	Means of Transportation Employees Use to Reach Office	Mission Critical Functions Taking Place at Office
Home office, Registered	1072 S De Anza Blvd, Suite A205, San Jose, CA 95129	No	car	order taking, entry, execution, the maintenance of customer accounts and access to customer accounts
Branch office, Registered	2090 Warm Springs Ct, Suite 148, Fremont, CA 94539	No	car	Client Meetings

Alternative Physical Location(s) of Employees:

In accordance with Rule 4370 each member must designate a location at which business will be conducted in the event the primary office of the Company must be evacuated. In accordance with this requirement, Integral Financial LLC will move critical members of its staff from affected offices to the Company's closest unaffected office locations. If none of the Company's other office locations is available to receive staff, they will relocate to Integral Financial LLC, 2090 Warm Springs Ct, Suite 148, Fremont, California 94539.

Customers' Access to Funds and Securities

Integral Financial LLC does not maintain custody of customers' funds or securities. Customer accounts are maintained at our clearing firm, Hilltop Securities Inc.

In the event of a SBD:

1. If telephone service is available, our registered persons will:
 - a. take customer orders or instructions and contact our clearing firm or the product sponsor on customers' behalf, or
 - b. provide information to the customer with information on contacting the clearing firm or product sponsor; and
2. If Web access is available, the firm will post on our Web site who customers may contact to access their funds and securities.

The Company will make this and additional information regarding accessing funds and/or securities available to customers through its disclosure policy (below).

Respective mutual fund sponsors and variable annuity product issuers maintain all account records and documentation related to its customers' investments.

If SIPC determines that the Company is unable to meet its obligations to its customers or if the Company's liabilities exceed its assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse the Company's assets to its customers. Integral Financial LLC will assist SIPC and the trustee by providing applicable books and records identifying customer accounts subject to SIPC regulation.

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

Integral Financial LLC maintains its primary books and records in hard copy format at 1072 S De Anza Blvd, Suite A205, San Jose, CA 95129. Frank Ho is responsible for the maintenance of these books and records.

Integral Financial LLC maintains the following document types and forms that are not transmitted to the clearing firm or product sponsor: new account forms.

Back-up of Paper Records:

The Company does not keep a back-up copy of its hard copy books and records because the Company does not hold customer funds or securities and customer investments are maintained directly by the clearing firm, respective fund or offeror. Therefore, an internal or external SBD affecting Company office should not pose a threat to customer records or financial holdings. While the Company may lose access to some or all FINRA- or SEC-required records in an external SBD, or may permanently lose some or all such records in an internal SBD (such as a fire), we believe our customers would not suffer as a result.

Back-up of electronic records:

The firm backs up its electronic records daily by utilizing the services of Smarsh.

In the event that electronic records are lost, the Company will either physically recover the storage media or electronically recover data from its back-up site, or, if the Company's primary site is inoperable, continue operations from its back-up site or an alternate location.

Financial and Operational Assessments

Operational Risk:

In the event of a SBD, Integral Financial LLC will immediately identify any methods available that will permit personnel to communicate with customers, other employees, critical business constituents, critical banks, critical counter-parties, and regulators.

Although the effects of a SBD will determine the means of alternative communication, the communications options the Company may employ will include telephone and voice mail. In addition, Integral Financial LLC will retrieve 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 a SBD, Integral Financial LLC's FINOP will determine the value and liquidity of its investments and other assets to evaluate the Company's ability to continue to fund its operations and remain in capital compliance.

Integral Financial LLC will contact its clearing firm, critical banks, and investors to apprise them of the Company's financial status. If the Company determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, Integral Financial LLC will request additional financing from our bank or other credit sources to fulfill its obligations to our customers and clients. If Integral Financial LLC cannot remedy a capital deficiency, the FINOP will file appropriate notices with applicable regulators and immediately take appropriate steps, including suspending certain business activities temporarily laying off non-essential personnel contacting SIPC.

In the event of a suspension or termination of the Company's business, the Company will attempt to notify customers regarding the situation and provide them with instructions for accessing their funds or securities, if applicable, for verifying transactions in process or for conducting future business. Notification will be a form allowed based on the circumstances permitted by regulatory authorities and may include telephone calls, letters or a posting on the Company's website.

Mission Critical Systems

Internal Mission Critical Systems

Integral Financial LLC'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

The Company has primary responsibility for establishing and maintaining business relationships with customers and has sole responsibility for the Company's mission critical functions of Customer relations/service, due diligence, investor relations/service and investor prequalification.

Order Taking

Currently, the Company receives orders from customers via telephone, and in person visits by the customer. During an SBD, the Company will continue to take orders through any of these methods that are available and reliable.

The Company will inform its customers what alternatives they have to send their orders to us in the event traditional methods are interrupted. Customers will be informed of alternatives by postings on the Company's website. If necessary, the Company will advise its customers to place orders directly with our clearing firm at (214) 953-4000.

Order Entry/Submission

Currently, Integral Financial LLC enters orders by recording them on paper and/or electronically and sending them to its clearing firm or product sponsor electronically, by telephone, by facsimile or by mail. Integral Financial LLC place customer orders through CSS. We have contacted CSS and were told that, under its BCP, we can expect service to be restored within 4 hours.

In the event of an internal SBD, the Company will send orders to its clearing firm clearing firm or product sponsor by the fastest alternative means available, which may include alternative telephone facilities, including cell phones and messenger or courier.

In addition, during an internal SBD, the Company may refer customers directly to the clearing firm for placing orders.

In the event of an external SBD, the Company will maintain the order in electronic or paper format, and deliver the order to the clearing firm or product sponsor by the fastest means available when it resumes operations.

The firm conducts business with product sponsors on a check and application basis and orders are sent to the sponsor in that manner.

Order Execution

The Company does not execute orders. All orders are executed through the Company's clearing firm. See below for information on the clearing firm's mission critical systems. All business transacted by the Company is done on a subscription basis and execution is handled by the product sponsor or issuer.

Mission Critical Systems Provided by Our Clearing Firm

The Company's 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.

Integral Financial LLC's clearing agreement, or addendum thereto, provides that the clearing firm will maintain a business continuity plan and the capacity to execute that plan.

Hilltop Securities Inc. represents the following:

1. In the event the Company's clearing firm executes its plan, it represents that it will notify the Company of such execution and provides the Company equal access to services as its other customers.
2. If, Hilltop Securities Inc. determines that it has not or cannot put its plan in place quickly enough to meet Integral Financial LLC's needs, or is otherwise unable to provide access to such services Hilltop Securities Inc. represents that it will assist the Company in seeking services from an alternative source.

3. Hilltop Securities Inc. backs up the Company's records at a remote site and 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.

In addition, the Company's clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

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. Hilltop Securities Inc. has the following SBD recovery time and resumption objectives: recovery time period of within 4 hours; and resumption time of within the same business day.

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

Customers

The Company currently communicates with our customers using telephone, fax, e-mail, our web site, U.S. mail and in person visits at our firm.

In the event of a 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

The Company currently communicates with its employees using telephone, fax, e-mail, its web site at <http://www.infi.biz>, regular mail and in person.

In the event of a 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.

Employees will be notified directly by the Disaster Recovery Coordinator, or his/her designee, as to events and the manner in which they should proceed.

Regulators

The Company is currently a member of FINRA and is registered with the SEC. In addition, the Company is a member of the MSRB.

The Company is registered to conduct business in the following states: Texas, Nevada and California.

Integral Financial LLC communicates with applicable regulators using telephone and regular mail.

In the event of a 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

Integral Financial LLC has contacted our critical business constituents (businesses with which the Company has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which the Company can continue its business relationship with these businesses in light of the internal or external SBD. The Company 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:

Business Constituent	Address, Phone Number
Hilltop Securities, Inc.	Address: 1201 Elm Street, Suite 3500, Dallas, TX 75270 Telephone: (214) 953-4000

Banks

Integral Financial LLC has contacted its banks and lenders to determine if they can continue to provide the financing that the Company may need in light of the internal or external SBD. The Company's accounts are currently with the following institutions:

Types of account (i.e. checking, savings, PAIB, escrow)	Name of Financial Institution	Address of Financial Institution	Telephone Number	Contact Name
Checking	First Tech Federal Credit Union	19960 Stevens Creek Blvd, Cupertino, CA 95014	(855) 855-8805	Branch Manager

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately.

Counter-Parties

Integral Financial LLC has contacted our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in

light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

Regulatory Reporting

Integral Financial LLC is subject to regulation by FINRA and SEC, as well as various state and other securities regulators (see list of states in Part 10 – Regulators).

The Company currently files 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 a 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.

The Company's current regulators can be reached as follows:

FINRA District 1:

Address: 100 Pine Street, Suite 1800, San Francisco, CA 94111

Phone: (415) 217-1100

SEC San Francisco Region:

Address: 44 Montgomery Street, Suite 2600, San Francisco, CA 94104

Phone: (415) 705-2500 Email: sanfrancisco@sec.gov

For information on contacting states where the firm is registered or licensed, please visit www.nasaa.org. The Company is also registered with, or a member of, the following: MSRB (msrb.org). For information on contacting this organization, please visit its website.

Disclosure of Business Continuity Plan

The Company will disclose in writing a summary of our BCP to customers at account opening. The Company will notify customers in writing when material changes are made to the Plan that may affect their business relationship with the Company. The Company will also post the summary on our Web site and mail it to customers upon request.

The summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope. In addressing the events of varying scope, the summary:

1. Provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption);
2. States whether we plan to continue business during that scenario and, if so, our planned recovery time; and
3. Provide general information on our intended response.

Our summary also discloses the existence of back-up facilities and arrangements. A copy of the Company's disclosure statement is included at the back of this Plan.

Updates and Annual Review

The Company will update this plan whenever there is a material change to its operations, structure, business or location or to those of the clearing firm.

The Company's BCP will be reviewed and modified, if necessary, at least annually, but no later than within 12 months of the date on which this Plan was put into effect or previously reviewed, to take into account any changes in the Company's operations, structure, business, or location or those of our clearing firm.

Customer Disclosure Statement

Integral Financial LLC

Integral Financial LLC plans to quickly recover and resume business operations after a significant business disruption (SBD) and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our company's business continuity plan (BCP) is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

The BCP addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Hilltop Securities Inc., backs up our important records 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 our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within the same business day. Your orders and requests for funds and securities could be delayed during this period.

The product sponsor maintains all records related to your investments and account holdings and backs up important records in accordance with their business continuity plan. For more information on their contingency plan, please contact the product sponsor directly at the telephone number provided on your statements or through their website.

Significant Business Disruptions: The Company's plan takes into account two kinds Significant Business Disruptions, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services.

Internal SBDs: In the event of a disruption in the Company's business operations due to an internal SBD, the Company will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location.

If personnel or operations must be moved to an alternate location, the Company anticipates that it will resume regular operations within 4 hours.

External SBDs: In the event of a disruption in the Company's business operations due to an external SBD, the Company will attempt to continue to conduct business as usual by moving its operations to an alternative location outside the effected area, if possible, or by providing

customers with alternative communication arrangements, as indicated below, to conduct business or to access their funds and securities.

The Company will attempt to resume business within 48 hours and to keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, the Company will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event.

If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

Communications: In the event you are unable to reach the Company at our main number, please proceed as follows:

1. Contact the Company at the following alternate telephone number: (510) 793-8883.
2. Access the Company's website at <http://www.infi.biz>.
3. Contact the clearing firm directly at one of the following telephone numbers to process transactions or for information on your holdings: (214) 859-5135 or (214) 859-6645.
4. Contact the product sponsor directly at the number listed on your most recent statement.
5. Access the clearing firm or product sponsor website for more information on contacting this entity and their business continuity plans. The website address can generally be found on your statement or offering documents.
6. Contact FINRA's District office at the following telephone number for more information on the company's status and additional instructions: (415) 217-1100.

Contact information: Any questions regarding the Company's Business Continuity Plans should be addressed to: Frank Ho, 1072 S De Anza Blvd, Suite A205, San Jose, CA 95129, Tel. (408) 996-1118.