



BUSINESS CONTINUITY PLAN JULY 30TH, 2020

Business Description:

DFPG Investments, Inc. (“DFPG Investments” or “DFPG”) is a dually registered broker-dealer and investment adviser with over 127 advisers throughout the country serving primarily retail clients. DFPG’s Home Office is based in Sandy, Utah.

In addition to the Home Office, DFPG has fifty-six branch office locations throughout the United States. A branch office roster is included in Exhibit 01. Branch personnel are independent contractors and the branch offices are independently owned and operated by the Branch Managers. It is DFPG’s policy for each branch to develop and document their own Business Continuity Plan. This plan covers DFPG’s home office operations.

DFPG does not maintain Customer funds on deposit or hold Customer securities for safekeeping.

The Plan:

This Business Continuity Plan (the “BCP” or “The Plan”) is designed to provide all personnel of DFPG with the guidelines to be followed in the event of a significant business disruption (“SBD”) to DFPG’s business.

The primary objectives of The Plan are six-fold:

1. Ensure the safety of everyone at DFPG in the event of a SBD
2. Provide a seamless transition of service and accessibility for all of DFPG’s customers
3. Be in a position to make a financial and operational assessment of DFPG’s business
4. Quickly recover and resume operations
5. Safeguard the personal and financial information of DFPG’s client’s
6. Protect DFPG’s property

Since the timing and impact of disasters and disruptions are unpredictable, DFPG will have to be flexible in responding to actual events as they occur. With that in mind, DFPG is providing you with this information related to The Plan.

DFPG plans to quickly recover and resume business operations after a SBD and respond by safeguarding its Clients’ information, its personnel, and its property, making a financial and operational assessment, protecting its books and records, and allowing its customers to transact business. In short, The Plan is designed to permit DFPG to resume operations as quickly as possible, subject to the scope and severity of the SBD.

A portion of The Plan’s objective is concerned with the safe evacuation of all personnel, and is designed to provide such personnel with "best practices" for everyone's safety. The balance of The Plan is a “Disaster Recovery Plan” and is aimed at securing the future success of DFPG even in the wake of a

SBD. The employment of all personnel is dependent upon DFPG being able to provide a continuous level of high quality service – even in the event of a SBD.

Copies of The Plan will be maintained in hard-copy form at DFPG Investments’ Home Office as well as the homes of the Disaster Recovery Team members listed below. An abbreviated version will also be added to the Firm’s website.

The following individuals are responsible for the duties of each position stated below and these individuals will constitute the Disaster Recovery Team, which is responsible for declaring an emergency and implementing this Plan:

DFPG’s Disaster Recover Team

President	Ryan Smith
CEO	Mike Bendix
Director	Daniel Luke
Operations Manager	David Laga
Office Manager	Shelley Smith
Human Resources Manager	Ryan Smith
Systems Director	Will Snider
IT Alternate	Executech

What Constitutes a SBD?

A SBD is any event that renders DFPG’s business unable to provide its usual high level of service without immediate recovery action. Such a disruption can fall into one of four categories, which are as follows:

1. Functional Disruption (Loss of key personnel, departmental systems disruption)
2. Temporary Disruption (Short-term evacuation, Major systems crash, extended power outage, etc.)
3. Significant Disruption (Generally causing the site to be inoperable such as a fire, earthquake, etc.)
4. Catastrophic Disruption (Major disaster, generally affecting a large area or involving personnel loss)

Standard Procedures

DFPG has designed certain standard procedures that require specific actions once implemented. These procedures are designed to keep DFPG operating in the event an SBD occurs. Once standard procedures are implemented, the following actions will be taken:

1. A company-wide email alert will be sent. This will alert DFPG personnel at the home office as well as the branch offices of a situation happening that may inhibit DFPG’s operations temporarily.
2. A website alert will be placed on www.dfg.com to provide clients with contact information for the various custodians so as to ensure clients have an avenue to access their funds until that time DFPG is able to restore operations.
3. The systems director will assess the NAS to determine if it is functional.
 - a. If operable, systems director will remain available for access support.
 - b. If inoperable, systems director will begin restoring the data to a cloud database provided by BOX. Once restored, the systems director will provide access to home office personnel.

4. DFIG personnel will immediately sign into their MXIE/Zulty's app to begin receiving phone calls from clients. If the phones are inoperable the Vice President of Business Development will be responsible for contacting YipTel and initiating call forwarding to one of DFIG's alternate branch locations or key personnel.
5. A compliance officer will be instructed to complete any necessary regulatory filings.

Significant Business Disruption Procedures

Functional Disruption: A functional disruption involves a disruption at departmental level (Finance, Compliance, Operations, etc.) Each department director is responsible for ensuring that a plan is in place to handle a functional disruption in their department. A departmental continuation plan will consist of the following:

1. Key personnel will cross-train at least one person to cover critical functions in their department. This person should be proficient enough to allow continued operations.
2. Each department will have system down procedures to continue operations in the event a critical system goes down.
3. In the event the functional disruption is severe enough that continued operations is not possible in a timely manner, DFIG's President will be notified. An assessment of options will be made by the recovery team on ways forward.
4. If applicable the department will notify the systems director to provide notification to DFIG's branch office network.

Temporary Disruption: A temporary disruption is one that effects the entirety of DFIG's home office. This disruption would be considered temporary if the estimated effect on operations is less than one day. DFIG's plan is to have personnel work remotely from home. In the event of a temporary disruption, the following procedures will be implemented:

1. The Office Manager will alert personnel.
2. Evacuation procedures will be implemented if deemed necessary.
3. A determination will be made on whether to allow key personnel to work from home until the disruption has been rectified.
4. An evaluation will be made as to whether standard procedures will be implemented.

Significant Disruption: A significant disruption is one that will result in the Home Office being inoperable for greater than one day. Significant disruptions are broken down into two-time frames, short term being less than one week, and long term being one week or more. DFIG's plan is to have personnel work remotely from home until the Home Office can be restored or an alternate location established. The following procedure will be implemented:

Short Term:

1. Standard Procedures (above) will be implemented
2. Personnel with laptops will begin working from home. Critical job responsibilities will be organized and assigned.
3. Personnel without laptops will remain at home on standby until home computers can be configured to work remotely.

Long Term (In addition to the above procedures)

1. Assessment will be made for alternate locations
2. Rent temporary or permanent office

3. Share space with a branch office of DFPG
4. Continue working from home
5. Purchase of additional equipment will be made to increase capabilities for personnel without laptops.

Catastrophic Procedures: A catastrophic disruption is one where recovery is not be deemed reasonable and steps will be taken to wind down the business.

1. Key personnel will assess the viability and available resources
2. The clearing firm and custodians will be notified and accommodations will be made to service clients short-term and plans will be made for the orderly transition of clients to another firm.
3. Clients will be informed.
4. A Compliance Officer will notify the firm's designated examining authorities (FINRA and the SEC).
5. A Compliance Officer will attempt to preserve existing books and records.
6. Vendors and service providers will be notified.

When to Evacuate:

Evacuate when you receive instruction from the Office Manager, when the alarm system is sounding or when you feel you are in danger and need to evacuate.

Evacuation Plan:

Once the Office Manager announces the decision to evacuate, the following general procedures will be observed. While much of this plan is common sense, if a dangerous situation exists in a facility, get out immediately, using stairs and not the elevator. DFPG wants to make sure that everyone is well informed to expedite a speedy and safe evacuation, while accounting for the well-being of all personnel. The evacuation meeting place is the Tai Pan / Apex parking lot, which is adjacent to the Home Office Building.

Upon evacuation, the Human Resources Manager(s) or Office Manager will take a headcount of evacuated personnel and the Systems Director or Office Manager will perform an inventory of laptop computers used by all personnel. It should be noted, that if it is determined that there is no perceived threat to the safety of DFPG personnel, all personnel should logoff from their personal computer or laptop computer, and in the case of a laptop computer, take it with them, to the extent practicable, when leaving the premises.

Some Things to Do, and Some Things Not to Do:

Personnel Should:

- Provide assistance to anyone in need.
- If possible, take *nearby* personal items, such as their purse, wallet, keys, coat, building key card, etc.
- If personnel are working on a laptop, such personnel should take the laptop with them when evacuating the building if able to do so safely.
- Shut the door behind them, if they are the last to leave an office/conference room.
- Leave via the nearest emergency exit.
- Go directly to the designated meeting place, which is the Tai Pan / Apex parking lot adjacent to the Home Office building.

Personnel Should Not:

- Do not use an elevator. Use the stairs to evacuate the building.
- Do not stop to use the telephone.
- Do not stop to shut down their computer(s), unless there is no perceived threat to their safety.

Contacting DFPG:

All DFPG Home Office Personnel should ensure that the Zulty’s app is downloaded on their phone. The Zulty’s app will allow users to continue receiving calls that would normally come through to their office phones. The app also allows users to place callers on hold, transfer calls, and park calls. In the event the phones are inoperable, the Vice President of Business Development will contact YipTel to have calls forwarded to another DFPG Branch Office or alternate number 801.949.3738, 801.467.5115 or 801.787.9631.

MXIE/Zulty’s App Instructions:

Login: Your Extension

Password: Your Password

Server Address: 192.81.117.151

Bound Phone: Your Extension

[iPhone User Guide](#)

[Android User Guide](#)

Emergency Contact Information:

Ryan O. Smith:	801.949.3738	(Sandy, UT)
Daniel J. Luke:	801.201.7714	(Sandy, UT)
Michael A. Bendix	760.212.3987	(Encinitas, CA)
David R. Laga	801.520.1273	(South Jordan, UT)
Charles Badalamenti:	720.454.4275	(Littleton, CO)

Backup Procedures for Internal Systems:

The Director and/or Systems Director is responsible for maintaining system backups for all critical and non-critical information required to support DFPG in its day-to-day business. DFPG’s location at 9017 S. Riverside Dr, Suite 210, Sandy, Utah 84070 (the “Home Office”) houses its key personnel and an extensive amount of data that DFPG believes is adequate to ensure its successful day-to- day business. In addition, DFPG utilizes the services of an IT consultant, Executech who would serve as the backup in the event the Systems Director is unavailable.

DFPG utilizes a Network Accessed Storage (NAS) device to store all critical and non-critical information locally. This NAS device contains multiple hard drives in a RAID configuration, which is backed-up daily to both a separate external hard drive via USB connection, and to iDrive, a third-party cloud back-up service. Backups could be restored to DFPG’s existing NAS or accommodations can be made with DFPG’s managed IT service provider, Executech, to arrange for short-term access to data until replacement hardware can be acquired.

Internet service to the Home Office is provided by CenturyLink with redundant backup service provided by Comcast.

In addition, DFPG stores critical information in OnBase, its enterprise content management system, which is a cloud-based software and storage provided by Hyland Software, who in turn stores data in multiple secure server locations around the country, with robust corporate back-up and security procedures. Remote access to OnBase can be configured by the Systems Director.

The following other systems and procedures are designed to provide non-intrusive backup and disaster recovery in the event of system failure or another type of SBD.

- Email: DFPG’s electronic mail (“email”) is facilitated through a secure third-party service provider, Smarsh, Inc. All email sent out from and/or received by DFPG is automatically archived in various safe and retrievable offsite locations within North America. Email can be accessed and archivals retrieved remotely.
- Security Access: Data access passwords to all critical systems are encrypted and stored on flash drives held by the Director and/or the President. In the event of a SBD, critical information can be quickly and easily retrieved from the respective backup systems by providing the relevant passwords.
- Alarm System: This is managed by an outside company that alerts the necessary authorities in the event of a fire. The automatic fire detection system includes a building-wide fire sprinkler system.

Regulatory Reporting:

In the event of a SBD, DFPG will notify Financial Industry Regulatory Authority (FINRA) and the United States Securities and Exchange Commission (SEC). Additionally, DFPG’s President/CCO is also the Executive Representative, and will update FINRA’s Firm Contact System.

SEC	(202) 551-4120	Public Affairs
FINRA	(301) 590-6500	General Inquiries

Financial Needs:

DFPG’s financial needs as they pertain to a potential SBD are somewhat limited in scope. First, DFPG does not hold Customer funds or securities. Second, DFPG does not borrow funds from banks, nor does DFPG maintain lines of credit. DFPG’s operations will be completely funded from its own working capital.

DFPG should not be exposed to credit risk, because it does not hold any significant proprietary securities positions or investments that could erode from the lack of liquidity in the broader market. Again, DFPG will be able to fund its operations from its own working capital.

Notwithstanding the previously stated information, DFPG will contact its clearing firm, RBC, critical banks, and customers to apprise them of DFPG’s financial status. If DFPG’s executives determine that DFPG may be unable to meet its obligations to those counter-parties, or otherwise continue to fund its operations, DFPG will request additional financing from its bank or other credit sources to fulfill its obligations to customers. If DFPG cannot remedy a capital deficiency, DFPG will file appropriate notices with applicable regulators and immediately take the appropriate and required steps.

DFPG’s financial records and funds can be accessed by either the President/CCO, COO or the CFO/FINOP, who are located in either Sandy, Utah or Littleton, Colorado.

Mission Critical Systems:

DFPG'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.

DFPG will be in contact with its critical business constituents, and determined the extent to which DFPG can continue its business relationships with them in the event of a SBD. DFPG is prepared to quickly establish alternative arrangements if a business constituent can no longer provide the necessary goods or services because of a SBD to them or to DFPG.

DFPG's major service providers are as follows:

RBC Correspondent Services (Clearing Firm)
60 S 6th St.
Minneapolis, MN 55402
Phone Number: 1.800.949.0242

Charles Schwab (Custodian Firm)
211 Main Street
San Francisco, CA 94105
Phone Number: 1.866.855.9102

TD Ameritrade (Custodian Firm)
200 S 108th Avenue
Omaha, NE 68154
Phone Number: 1.800.669.3900

Smarsh, Inc. (email services and email retention) 921 SW
Washington Street, Suite 540
Portland, OR 97205
Phone Number 1.866.762.7741

First Utah Bank (banking and financial services)
3826 South 2300 East
Salt Lake City, Utah 84109
Phone Number 1.801.272.9484

Hyland Software OnBase (Content management, software
and storage)
28500 Clemens Road
Westlake, Ohio 44145
Phone Number 1.888.495.2638

Orion Advisor (Advisory Reporting and Billing)
Phone number 402.496.3513

IT Consultant | Executech
Dana Schreiber
1314 West 11400 South, Suite 200
South Jordan, Utah 84095
Phone number 801.253.4541

Cell 801.703.3506
Email dana.schreiber@executech.com

CenturyLink (ISP)
Phone number 800.244.1111
Comcast (backup ISP)
Phone number 866.935.9106

YipTel (VoIP Telephone System)
Dacota Brooks
Phone number 801.428.1804
Cell phone 801.875.9895
Email DacotaB@Broadvoice.com

DFPG's alternative clearing firm:

Raymond James & Associates, Inc (Correspondent Services)
880 Carillon Parkway
St. Petersburg, FL 33716
Phone Number: 1.727.567.1000 x73990

Alternate Communications between DFPG and Customers:

DFPG currently communicates with its customers using the telephone, email, our website, www.dfpg.com (on a very limited basis), fax, U.S. Mail, overnight couriers, and in person visits. In the event of an SBD, DFPG will assess which means of communication are still available to DFPG, and use the means closest in speed and form (written or oral) to the means that DFPG has used in the past to communicate with other parties. For example, if DFPG has communicated with a party by email but the Internet is unavailable, DFPG will call the party on the telephone and follow-up where a record is needed with paper copy in the U.S. Mail.

Alternate Communications between DFPG and Personnel:

DFPG currently communicates with its personnel using the telephone (both landlines and cellular phones), email, and in person. In the event of an SBD, DFPG will assess which means of communication are still available to DFPG, and use the means closest in speed and form (written or oral) to the means that DFPG has used in the past to communicate with the other party. DFPG will also employ a calling tree so that DFPG's executives can reach all personnel quickly during an SBD. The calling tree includes the home, office and cellular phone numbers for all personnel. See Exhibit 02.

Providing Customers with Prompt Access to Their Funds and Securities:

DFPG has created this Plan to provide for the quickest recovery back to normal business operations, and strives to provide customers with seamless service in the case of a SBD. However, DFPG will not receive Customer funds or hold customer securities. DFPG does not maintain customer funds on deposit or hold Customer securities for safekeeping.

Currently, transactions are processed utilizing RBC Correspondent Services (DFPG's clearing firm) and Charles Schwab and TD Ameritrade (DFPG's Custodian Firms), and by application or subscription way directly with the issuer. In the event that the SBD is at RBC's location on behalf of DFPG's customers, or at the issuer's location, DFPG will assist such customers in any way possible to ensure that they have prompt access to their funds and securities to the extent practicable and permitted given the restrictions of the privacy

rules and securities regulations.

Updates and Annual Review of The Plan:

The Plan will be reviewed minimally on an annual basis by DFPG's President/CCO, Director, Manager, CFO/Compliance Specialist, and/or Systems Director. Further, DFPG will modify The Plan to reflect any material changes in its operations, structure, business, or location, as they occur. Completion of this annual review will be evidenced by a written sign-off by the President/CCO and Systems Director (if such person is in the employment of DFPG).

In addition, a brief statement will be made which will outline either the modifications made to The Plan, or the fact that no material modifications were required.

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Exhibit 01 – DFPG Branch Offices

CRD Branch #	City	State	Postal Code	Telephone
457324	Sandy	UT	84070	801-838-9999
458468	LITTLETON	CO	80123	720-454-4275
475524	Sandy	UT	84070	801-467-5115
475542	ENCINITAS	CA	92024	760-212-3987
484670	OREM	UT	84097	801-221-2939
497050	GRAND JUNCTION	CO	81505	877-405-4015
507914	SALT LAKE CITY	UT	84123	(801) 268-2245
521674	CONRWALL	NY	12518	(845) 534-6818
535758	Rancho Santa Fe	CA	92091	858-200-0616
578034	Windsor	CO	80550	970-226-3041
579230	Manhattan Beach	CA	90266	(310) 493-9999
606545	Orem	UT	84097	385-223-8688
611329	Mount Airy	MD	21771	301-829-8610
613708	Edmond	OK	73013	405-330-4015
613713	Springfield	MO	65804	417-881-7100
613715	Round Rock	TX	78664	512-218-7993
616214	Durango	CO	81301	970-385-2555
620837	Draper	UT	84020	801-619-9240
626169	San Jose	CA	95126	408-236-7630
626170	San Diego	CA	92101	480-236-7630
634817	Saint Louis	MO	63131	636-386-3300
641760	Greenville	SC	29615	864-248-6420
641818	Williamsburg	VA	23185	757-345-3577
641946	Dallas	TX	75248	972-248-1930
652180	OKLAHOMA CITY	OK	73116	405-810-1777
652184	LAKE KIOWA	TX	76240	940-665-8644
662097	Kingfisher	OK	73750	405-375-6761
670641	Pocatello	ID	83201	801-838-999
673255	Medford	OR	97504	541-842-8430
686335	Henderson	NV	89052	408-236-7630
689323	Bethlehem	PA	18018	(610) 419-8670
689982	OREM	UT	84057	801-467-5115
691033	La Canada	CA	91011	626-818-7640

704085	Windsor	CO	80550	9706860489
708567	ST. GEORGE	UT	84770	385-375-8650
708584	IRVINE	CA	92612	949-222-2999
708593	DENVER	CO	80293	(720) 283-2121
708594	PROVIDENCE	UT	84332	435-787-0500
708598	IDAHO FALLS	ID	83402	208-529-3462
708600	SWANSEA	IL	62226	618-416-6200
708602	Meridian	ID	83642	208-350-6776
708613	CEDAR CITY	UT	84721	385-375-8650
708614	Cedar City	UT	84720	435-867-5685
708618	RIVERSIDE	CA	92507	951-335-0159
708747	South Jordan	UT	84095	801-550-5068
709553	PORTOLA VALLEY	CA	94028	650-233-9122
709555	PALO ALTO	CA	94301	6502339122
710934	Provo	UT	84604	(801) 331-5511
711710	San Diego	CA	92122	858.597.4100
716339	Greenville	SC	29615	(864)331-4400
716354	South Jordan	UT	84095	(800) 418-1788
726004	Colorado Springs	CO	80903	7192096200
735110	NEWPORT BEACH	CA	92660	949-209-0277
738359	IDAHO FALLS	ID	83402	208-520-8158
739495	DECATUR	AL	35601	256-350-5556
740781	SALT LAKE CITY	UT	84111	801-595-1730
741796	Salt Lake City	UT	84101	720-283-2121

Exhibit 02 – DFPG Personnel Contact Information

NAME	EXT	EMAIL	PRIMARY	EMERGENCY
BRACKEN LARSEN	7612	blarsen@dfpg.com	(801) 721-1136	Cathy (Wife) 801-726-7586
BRAD ANDERSON	7604	banderson@dfpg.com	(801) 918-7685	Steve (Dad) 801-580-2911
BRAYDEN EVANS	7609	bevans@dfpg.com	(801) 259-9840	Mikaela (Wife) (801) 739-1348
CHARLIE BADALAMENTI	N/A	cbadalamenti@dfpg.com	(720) 454-4275	Danielle (Daughter) 720-971-1822
CRAIG WATANABE	N/A	cwantanabe@dfpg.com	(626) 818-7640	Sandee (Wife) (818) 281-6540
DAN LUKE	7579	dluke@diversify.com	(801) 201-7714	M'Lisa (Wife) 801-232-7770
DAVE LAGA	7596	dlaga@dfpg.com	(801) 520-1273	Kacey (Wife) 801-787-6263
ERIC VOEGELI	7918	evoegeli@dfpg.com	(801) 550-3064	Valerie (801) 706-8488
HALEY ELLIS	7916	hellis@dfpg.com	(801) 842-4352	Dorthy (Mom) (801) 450-4670
JAMES CANNON	7581	jcannon@dfpg.com	(801) 828-7565	Elisa (Sister) 801-842-7545- Grant-(Dad) (801) 971-5231
JEFF BRIMHALL	7918	jbrimhall@dfpg.com	(801) 888-4626	Angela (Wife) 216-280-1875
MATT ARGYLE	7608	margyle@dfpg.com	(435) 590-9433	Mandy (Wife) (801) 518-6264
MIKE BENDIX	7911	mbendix@dfpg.com	(760) 212-3987	Jackie (Wife) 760-214-3898
MIKE'S DIRECT LINE	7911		(801) 981-5168	MIXIE LINE
MISSY TAYLOR	7600	mtaylor@dfpg.com	(954) 579-2535	Sheila Fovel (Mom) (585) 301-1355
NATE WADE	7585	nwade@dfpg.com	(801) 718-6445	Todd Wade (Dad) (801) 558-7383
NATINA EDGAR	7595	nedgar@dfpg.com	(801) 243-3993	Nancy (Mom) 801-205-1536 -Nick (801) 971-0914
NICK HANSEN	7588	nhansen@dfpg.com	(801) 661-7624	Kelsey (Wife) 801-949-3092
RYAN SMITH	7578	rsmith@dfpg.com	(801) 949-3738	Alisha (Wife) 801-864-4953
SAM FLINDERS	7913	sflinders@dfpg.com	(435) 659-8733	Lisa (Mom) (435) 640-8733
SHELLEY SMITH	7603	ssmith@dfpg.com	(801) 870-8372	Ryan-801-949-3738- Maegan (Daughter) (801) 949-8848
STEPHANIE SCHMIDT	7920	sschmidt@dfpg.com	(801) 718-2948	Brendon (Husband) 801-718-8072
WILL SNIDER	7583	wsnider@dfpg.com	(801) 857-9080	Debbie (Wife) 801-367-1524