

Capstone Pacific Investment Strategies, Inc.

Business Continuity Plan (BCP)

I. Emergency Contact Persons

Our firm's emergency contact person is:

Bryce Pease, President & Chief Compliance Officer

970 South Village Oak Drive, Suite #104

Covina, CA, 91724

Phone: (626) 915-7006

II. Firm Policy

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.

Bryce Pease is responsible for approving the plan and for conducting the required annual review. **Bryce** has the authority to execute this Business Continuity Plan.

If in the event of a major catastrophe of the **Covina** office, the following procedures will go into effect.

Upon arrival at 970 South Village Oak Drive, Suite #104, any staff member should ascertain the condition of the office due to a major catastrophe and make the decision to immediately begin notifying other staff members via cell phone and proceed to the Disaster Recovery Office ("DRO" – see Section V for actual address). If the staff member is not sure to the extent of, or consequences of, the catastrophe, that staff member should contact a member of the senior management immediately or wait for them to arrive.

III. Business Description

Capstone Pacific Investment Strategies, Inc. is an Investment Advisory firm involved in the financial management of client accounts.

Our custodian is TD Ameritrade Institutional – 5010 Wateridge Vista Drive
San Diego, CA 92121

TD Ameritrade Institutional's Phone Number is: (800) 431-3500

IV. Office Locations

Capstone Pacific Investment Strategies, Inc. has its offices located in **Covina, CA.**

Our employees may travel to this office by means of foot, car, bus or taxi.
We engage in order taking and entry at this location.

V. Alternative Physical Location of Employees

In the event of an SBD, we will move our trading desk operations to the following site:

TD Ameritrade
5010 Wateridge Vista Drive
San Diego, CA 92121
(800) 431-3500

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. TD Ameritrade Institutional holds our clients funds or position. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our custodian on their behalf.

VII. Data Back-up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary books and records and its electronic records in our **Covina office**.

Our firm maintains its back-up of its electronic and hard copy materials offsite.

In the event of an internal or external SBD that causes loss of our paper records, we will physically recover them from our back-up site. 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 either physically recover the storage media or electronically recover data from our back-up site.

VIII. Financial and Operational Assessments

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our Web site (www.capstonepacificinc.com), telephone voice mail, and secure email. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

In the event that **Capstone Pacific Investment Strategies, Inc.** is put in a position to raise funds due to a credit issue, the firm will apply for a loan or credit line through one of the banking institutions it currently uses.

IX. Mission Critical Systems

Our firm'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.

Internet Connection

Our DRO has an internet connection that will enable the trading desk to access the Fiserv system as well as the website of our custodian and regulators. Our internet carrier is Verizon.

DRO Telephone System

Capstone Pacific Investment Strategies, Inc. has a telephone system in place at the DRO office that our trading office phones can be transferred to in the event of a SBD.

IX. Critical Business Constituents, Banks, and Counter-Parties

Our critical business constituents, banks, etc. will be contacted by **Bryce Pease**, Chief Compliance Officer from his residence.

X. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at account opening. We also post the disclosure statement on our Website and mail it to customers upon request.

XI. 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 custodian. In addition, our firm will test and review the BCP bi-annually with an outside data services firm or other service provider to test and modify it for any changes.

XII. Senior Management Approval

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

Signed: 

December 13, 2012

Bryce B. Pease
President & Chief Compliance Officer