

Business Continuity Plan

According to the website, <http://www.finra.org/industry/small-firm-business-continuity-plan-template>, "There are 10 critical elements of a Business Continuity Plan (BCP) specified in FINRA Rule 4370. Each firm need only address the elements applicable to its business, but if you do not include a specified element in your firm's plan, your plan must document why it is not included."

The following are the ten FINRA requirements, and the Turov Investment Group Inc. ("TIG") answers:

(1) Data back-up and recovery (hard copy and electronic):

All client assets managed by TIG are held either by Guggenheim Investments (formerly known as Rydex) or Nationwide Insurance. These firms also retain several years' worth of accounts statements and transaction records. Clients may contact Guggenheim at 1-800-820-0888 and or Nationwide at 1-866-233-3223 for the location of the extant websites that contain the preceding information. In the event that a catastrophic event prevented TIG from operating or from contacting Guggenheim or Nationwide itself, clients have ability to contact Guggenheim and/or Nationwide directly with instructions to put all of their assets into an appropriate money market fund for as long as necessary. In addition, in the event of the death or the incapacitation of Mr. Turov, the only employee of TIG that is authorized to place orders, Mr. Turov has given his wife, Tasanee Turov, and another individual (which may change from time to time), instructions for contacting Guggenheim and/or Nationwide with instructions to put all clients' accounts in the money market fund, and to advise all Guggenheim and Nationwide clients of Mr. Turov's incapacitation or death. Regarding other documentation, TIG maintains all substantive e-mails to or from clients' address to or sent by investmentadvice@aol.com, the e-mail address all clients have been instructed to use exclusively, for a period of seven years. Copies all investment advisory contracts have been supplied to the California Department of Business Oversight in March 2016. Originals of such copies are in TIG's files. Copies of contracts signed subsequent to March 2016 are also held in TIG's files but have not been supplied to the Department of Business Oversight. Furthermore, copies of all contracts signed before March 2016 have already been supplied to each client, and copies of contracts signed after March 2016 will be supplied to each client shortly after signature. Other documentation of client records are currently

in metal filing cabinets, and may or may not be available depending upon the condition of said cabinets in the event of a significant natural disaster.

(2) All mission critical systems:

All mission critical systems are on various computers at TIG and are backed up on flash drives weekly. In the event of a natural disaster, TIG would never be more than five business days behind, and TIG believes that recreating these five days of potentially lost information would not be extremely difficult.

(3) Financial and operational assessments:

All of TIG financial records are updated monthly at Wagner & Company, a San Diego based Certified Public Account. Intra-month information is available electronically from Guggenheim, Nationwide, and Bank of America if it became necessary to access information intra-month.

(4) Alternate communications between customers and the member:

All clients have been advised that the preferred communication method is email to investmentadvice@aol.com. Such e-mails could be accessed from any computer, and TIG would envision doing so.

(5) Alternate communications between the member and its employees:

While TIG uses the services of numerous outside independent contractors to perform certain tasks, Daniel Turov is TIG's only employee.

(6) Alternate physical location of employees:

While TIG uses services of numerous outside independent contractors to perform certain tasks, Daniel Turov is TIG's only employee. In any event of a natural disaster, Mr. Turov would relocate at a nearby hotel or motel.

(7) Critical business constituent, bank, and counter-party impact:

TIG would be able to conduct its business with Guggenheim, Nationwide, and Bank of America by computer, by telephone or in person from any location.

(8) Regulatory reporting:

TIG would be able to continue regulatory reporting for information either from one of its computers if were possible to remove the computer from the disaster site, or from the offices of the aforementioned Wagner & Company.

(9) Communications with regulators:

Communications with regulators can continue by US mail and internet without interruption.

(10) How the firm 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:

This is answered, in detail, in TIG's response to item number one.