

Alpha Investment Management, LLC
Form ADV Part 2 – Disclosure Brochure
Effective: July 1st, 2015

Item 1

This Brochure provides information about the qualifications and business practices of Alpha Investment Management, LLC.

If you have any questions about the contents of this Brochure, please contact Alpha Investment Management, LLC at (303) 521-3561

This brochure provides information about the qualifications and business practices of Alpha Investment Management, LLC. If you have any questions about the contents of this brochure, please contact us at (303) 521-3561. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Alpha Investment Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Alpha Investment Management, LLC
CRD No: 171460
11907 Hangar Ct
Broomfield, CO, 80021
Phone: (303)521-3561
<http://www.aimforalpha.com>

Item 2 - Material Changes

This section describes the material changes to Alpha Investment Management, LLC's Brochure since its most recent filing on January 2nd, 2015.

Since our last disclosure document, following are the material changes:

1) Item 4 updated to reflect that we offer tailored advisory services unique to each client based on multiple market timing investment plans / strategies.

2) Alpha Investment Management, LLC does not meet any of the exemptions required to register as a federally covered advisor. Because of this Alpha Investment Management, LLC has switched to Colorado state registration by filing this new Form ADV as well as a Form ADV-W to withdraw from federal registration. At such point as Alpha Investment Management, LLC meets the criteria for federal registration, we will re-apply.

3) Item 9 updated to show changes based on SEC examination of Alpha Investment Management, LLC completed on June 3rd, 2015.

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the "Advisers Act"). The amendments are designed to require a registered investment Advisor to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor's business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts, Part 2A and Part 2B. Part 2A of the new Form (the "Firm Brochure") provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. Part 2B of the new Form (the "Brochure Supplement") requires an Advisor to provide information about certain advisory personnel. Alpha Investment Management, LLC strives to provide you with the complete and accurate information at all times. We encourage all current and prospective investors to read this Brochure and call Alpha Investment Management, LLC to discuss any questions you may have.

Future Changes

From time to time, Alpha Investment Management, LLC may amend this Firm Brochure to reflect changes in business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Firm Brochure or this summary of Material Changes shall be provided to each Client annually or if a material change is made. At any time, you may view the current Firm Brochure on-line at the SEC's Investment Advisor Public Disclosure website at <http://advisorinfo.sec.gov>.

To review the firm information for Alpha Investment Management, LLC

- Click Investment Advisor Search in the left navigation menu.
- Select the option for Investment Advisor Firm and enter 171460 (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- ADV Part 1 will be displayed.
- This will provide access to Form ADV 1 and 2A.
- On the left navigation, Form ADV Part 2A is located near the bottom.

You may also request a copy of this Firm Brochure at any time, by contacting Alpha Investment Management, LLC

CRD No: 171460

11907 Hangar Ct

Broomfield, CO, 80021

Phone: (303)521-3561

<http://www.aimforalpha.com>

Item 3 – Table of Contents

ITEM 2 - MATERIAL CHANGES 2

ITEM 3 – TABLE OF CONTENTS 4

ITEM 4 – ADVISORY SERVICES 5

ITEM 5 – FEES AND COMPENSATION 6

ITEM 6 – PERFORMANCE-BASED FEES 7

ITEM 7 – TYPES OF CLIENTS 7

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS 7

ITEM 9 – DISCIPLINARY INFORMATION 8

ITEM 10 – OTHER FINANCIAL ACTIVITIES AND AFFILIATIONS 9

ITEM 11 – CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND
PERSONAL TRADING 9

ITEM 12 – BROKERAGE PRACTICES 10

ITEM 13 – REVIEW OF ACCOUNTS 12

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION 12

ITEM 15 – CUSTODY 13

ITEM 16 – INVESTMENT DISCRETION 13

ITEM 17 – VOTING CLIENT SECURITIES 14

ITEM 18 – FINANCIAL INFORMATION 14

ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS 14

PRIVACY POLICY 15

FORM ADV PART 2B – INDIVIDUAL DISCLOSURE BROCHURE FOR ERIC JAMES 17

FORM ADV PART 2B – INDIVIDUAL DISCLOSURE BROCHURE FOR BRANNAN JOHNSON
20

Item 4 – Advisory Services

A. Firm Information

Alpha Investment Management, LLC is an LLC registered with the State of Colorado since March 24th, 2014.

Principal Ownership: Eric James 50%

Principal Ownership: Brannan Johnson 50%

B. Advisory Services Offered

Advisor manages stock and option investments including ETFs (exchange traded funds) & ETNs (exchange traded notes) that allow for hedging, market timing, and exposure to underlying derivatives (such as volatility).

C. Tailored Advisory Services

Alpha Investment Management, LLC provides individualized, tailored investment advice and management to clients. Each Client may choose which overall strategy they would like us to manage for them as well as full ability to impose reasonable restrictions on their account making any account potentially unique to any other. Each client's account is managed on the basis of the client's financial situation and investment objectives and in accordance with any reasonable restrictions imposed by the client on the management of the account. Prior to rendering investment management services, Alpha Investment Management, LLC will ascertain, in conjunction with the Client, that the Client's financial situation, risk tolerance, and investment objective are consistent with assigning a portion of the client's assets to a speculative market timing investment program.

Prior to engaging Alpha Investment Management, LLC to provide investment advisory services, the Client is required to enter into an investment management agreement with Alpha Investment Management, LLC acknowledging that all funds placed under management of the advisor are speculative funds and setting forth the terms and conditions of the engagement and the services to be provided.

D. The advisor does not participate in wrap fee programs.

E. Alpha Investment Management, LLC does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. However, Alpha Investment Management, LLC does recommend that all clients use Interactive Brokers to allow us to manage all accounts in a simple manner without the complexity of multiple custodial and execution service providers. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Alpha Investment Management, LLC to direct trades to this Custodian as agreed in the Investment Management Agreement. Further, Alpha Investment Management, LLC does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by trade basis.

Alpha Investment Management, LLC directs trades to the Custodian on a discretionary basis. As of July 1, 2015, the Advisor has approximately \$3,400,000 of client assets under management.

Item 5 - Fees and Compensation

A. Compensation for advisory services. Advisor does not currently charge an annual fee as a percentage of assets under management. Alpha Investment Management, LLC does however charge a performance based fee. Please see Item 6 for details.

Prior to engaging Alpha Investment Management, LLC to provide investment advisory services, the Client is required to enter into an investment management agreement with Alpha Investment Management, LLC acknowledging any and all fees to be paid to the Advisor.

B. Advisor fees are automatically deducted from the client accounts by Interactive Brokers without any interaction by the Advisor. Fees are not charged in advance. Currently, all client accounts are held at Interactive Brokers. Accounts at Interactive Brokers have fees calculated and charged after the end of the calendar quarter. All securities held in a portfolio managed by Alpha Investment Management, LLC will be independently valued by the Custodian. Alpha Investment Management, LLC will not have the authority or responsibility to value portfolio securities.

Clients will receive independent statements from the Custodian no less frequently than quarterly. It is the responsibility of the client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

C. Other fees

Accounts held at Interactive Brokers incur brokerage costs including margin interest, short position borrowing fees, exchange pass through fees, and transaction costs from all trading activity in their account. Clients that have an account at Interactive Brokers should review Item 12 on Brokerage practices.

D. Client fees are not charged in advance.

E. Asset based service fees.

The advisor does not receive commissions or markups on the client accounts.

Item 6 – Performance-Based Fees

Alpha Investment Management, LLC receives performance-based fees for its investment management services. These services are only offered to qualified clients as defined in Rule 205-3(d) of the Investment Advisors Act of 1940. A performance-based fee is an asset manager's fee for managing a client's account in which Alpha Investment Management, LLC's compensation is based upon the net returns of the account being managed compared to the previous high water mark on that account within the previous 12 months. When calculating net returns, performance-based fees are based on absolute returns. In certain instances, we may negotiate performance-based fees with specific clients.

Prior to engaging Alpha Investment Management, LLC to provide investment advisory services, the Client is required to enter into an investment management agreement with Alpha Investment Management, LLC acknowledging the performance-based fees to be paid to the Advisor as well as submitting the necessary documents for Advisor to meet the Qualified Client criteria outlined in Rule 205-3(d) of the Investment Advisors Act of 1940.

Side-by-side Management – Although we manage numerous portfolios with similar investment objectives, or may manage accounts with different objectives that trade in the same securities, the portfolio decisions relating to these accounts and the performance resulting from these decisions, may differ from portfolio to portfolio. Each account's performance may also differ due to differences in specific client requests, client deposits & withdrawals, investment restrictions, tax considerations, cash flows, trade rotation, etc.

The simultaneous management of different client accounts, with different fee structures, creates certain conflicts of interest, as the fees for the management of some client types are higher than for others. Nevertheless, when managing the assets of these accounts, we have a duty to treat all accounts fairly and equitably over time.

Item 7 – Types of Clients

Alpha Investment Management, LLC may provide services to a variety of client types. Clients may include: Private investors, High net worth individuals, and Qualified Institutions/Organizations with private capital to invest.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

Alpha Investment Management, LLC draws all necessary information for developing its investment models and strategies from its own proprietary research. This research considers the underlying structure of the ETFs and ETNs we trade in an effort to find and benefit from any inefficiencies or structural arbitrage opportunities that may exist.

This research also considers Technical Stock Market Analysis in an effort to improve our returns when market conditions change. To do this we use linear regression and decision tree models

of historical stock market data to find patterns that may allow us to benefit from cycles that repeat over time. However, there is no guarantee that this, or any analysis of any kind will be beneficial. No historical data or predictive model is indicative of future results or returns.

B. The advisor follows market timing strategies where the goal is to be profitable by being a net seller of volatility in both rising and falling markets having accounts hold long positions or short positions. Such positions might include funds that represent leveraged positions. The advisor also holds positions that hedge each other (typically move opposite directions). These type of hedges have the risk of becoming correlated and failing to provide their intended hedging function. The advisor has accounts hold additional option positions to protect against such an occurrence. Even with these hedges and options, the risks of loss of a market timing / volatility selling strategy could be considerable and the advisor requires the client to only place speculative funds under its management. The advisor typically trades only 2-3 days per month in client accounts. These trades are generally timed with option expiration Friday, which is the 3rd Friday of every month. Advisor may trade more often or on any others days to rebalance, respond to a market signal, or if market conditions change in such manner that advisor see a potential advantage to trading on that day.

C. The advisor primarily has the client funds invested in stocks and various ETFs and options on ETF, ETN, stock market index & volatility instruments. Exchange traded products that offer exposure to stock market volatility entail significant risk and are intended for sophisticated investors who actively manage their investments. Volatility ETPs generally gain exposure to market volatility through futures and/or options contracts on the VIX; direct investment in the VIX is not possible. Therefore, a Volatility ETP's return may be significantly different than the performance of the VIX, the benchmark VIX futures index, and actual realized volatility of the S&P 500 Index. VIX futures contracts are among the most volatile segments of all futures markets. Volatility ETPs may be subject to extreme volatility and greater risk of loss than traditional exchange traded funds. Such funds may use leverage to increase the exposure to two or more times the index, long or short. The use of long and short index/volatility/ETF/ETN funds, with leverage involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

Alpha Investment Management, LLC and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Background information is available on the Investment Advisor Public Disclosure website at <http://advisorinfo.sec.gov>.

To review the firm information for Alpha Investment Management, LLC, click Investment Advisor Search in the left navigation menu and enter, select the option for Investment Advisor Firm and enter 171460 (our firm's CRD number) in the field labeled "Firm IARD/CRD Number:". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

On June 3rd, 2015 the SEC completed an examination of Alpha Investment Management, LLC and delivered the advisor a letter outlining matters for immediate corrective action. Based on this letter Alpha Investment Management, LLC has made modifications including changing from federal to state registration, eliminating all non-compliant advertising materials, increasing ability for clients to impose reasonable restrictions on their account, adopting new policies and procedures to verify Qualified Client status, and updating the advisor's Form ADV. (This document).

There are no other legal, regulatory or disciplinary events involving Alpha Investment Management, LLC.

Item 10 – Other Financial Activities and Affiliations

A. Alpha Investment Management, LLC is not registered as a broker-dealer.

B. Alpha Investment Management, LLC is not registered as a futures commission merchant, commodity pool operator, a commodity trading advisor.

C. There is no relationship or arrangement that is material to our advisory business or to our *clients* that we or any of our *management persons* have with any *related person* listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor
5. banking or thrift institution
6. accountant or accounting firm
7. lawyer or law firm
8. insurance company or agency
9. pension consultant
10. real estate broker or dealer
11. sponsor or syndicator of limited partnerships.

D. The advisor does not recommend or select other investment advisers for clients

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

A. Alpha Investment Management, LLC has implemented a Code of Ethics that defines our fiduciary commitment to each Client. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Alpha

Investment Management, LLC owes a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Alpha Investment Management, LLC to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures.

Alpha Investment Management, LLC has written its Code of Ethics which will be provided to any client or prospective client upon request. To request a copy of our Code of Ethics, please contact us at (303) 521-3561.

B. Personal Trading and Conflicts of Interest

Alpha Investment Management, LLC does not have a material financial interest in any investment recommended to clients.

C. The advisor and related persons have investment accounts that invest in similar securities as the client accounts. This can cause a potential conflict of interest. This is addressed by trading in securities where it is believed that the timing (before or after) any one trade does not have a material or predictable effect on any other single trade because of the large scale of the underlying instruments traded. If it becomes apparent that a direct conflict has shown up, the advisor and related persons yield to the interests of the client accounts. In a direct conflict situation, this typically means the advisor or related persons will trade only after the Client's trade is fully entered or exited.

D. The advisor and related persons have investment accounts that invest in similar securities and at similar times as the client accounts. This can cause a potential conflict of interest. This is addressed by trading in securities where it is believed that the timing (before or after) any one trade does not have a material or predictable effect on any other single trade because of the large scale of the underlying instruments traded. If it becomes apparent that a direct conflict has shown up, the advisor and related persons yield to the interests of the client accounts. In a direct conflict situation, this typically means the advisor or related persons will trade only after the Client's trade is fully entered or exited.

Alpha Investment Management, LLC or related persons may have an interest or position in certain securities, which may also be recommended to you. At no time, will Alpha Investment Management, LLC or any associated person of Alpha Investment Management, LLC, transact in any security to the detriment of any Client. This typically means the advisor or related persons will trade only after the Client's trade is fully entered or exited.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Alpha Investment Management, LLC does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. However, Alpha Investment Management, LLC does recommend for convenience that all clients use Interactive Brokers to allow us to manage all accounts in a simple manner without the complexity of multiple custodial and execution service providers. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Alpha Investment Management, LLC to direct trades to this Custodian as agreed in the Investment Management Agreement. Further, Alpha Investment Management, LLC does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Alpha Investment Management, LLC may recommend a Custodian (such as Interactive Brokers) based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and procedures for order entry. Alpha Investment Management, LLC does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Alpha Investment Management, LLC recommends to US Clients that they established their brokerage account[s] at Interactive Brokers.

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. Alpha Investment Management, LLC does not participate in soft dollar programs sponsored or offered by any broker-dealer.
2. Brokerage Referrals - Alpha Investment Management, LLC does not receive any compensation from any entity in connection with the recommendation for establishing a brokerage account.
3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Alpha Investment Management, LLC will place trades within the established account[s] at the Custodian designated by the Client. Further all Client accounts are traded within their respective brokerage account[s]. Alpha Investment Management, LLC will not engage in any principal transactions (i.e., trade of any security from or to Alpha Investment Management, LLC's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Alpha Investment Management, LLC will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Alpha Investment Management, LLC will execute its transactions through an unaffiliated broker-dealer selected by the Client. Alpha Investment Management, LLC may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer/mutual fund company for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Investment Advisory Clients – Accounts are monitored on an ongoing basis by Alpha Investment Management, LLC for adherence to investment strategy. Investment management and supervision over the securities contained in the Client's portfolio are performed in an ongoing basis by Alpha Investment Management, LLC, as applicable.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A, each Client account shall be reviewed at least quarterly. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Alpha Investment Management, LLC if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Trustee or Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor also prepares an annual review of the managed accounts.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Alpha Investment Management, LLC

Alpha Investment Management, LLC does not currently enter into referral agreements with third-party advisors under which the third- party advisor pays a fee to Alpha Investment

Management, LLC for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended.

B. Client Referrals from Solicitors

Alpha Investment Management, LLC does not presently pay any solicitors to refer business to Alpha Investment Management, LLC. Alpha Investment Management, LLC may receive a Client referral from a third-party. No compensation is given for the referral. All referrals are a professional courtesy and in the interest of the Client.

Item 15 – Custody

Alpha Investment Management, LLC does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Alpha Investment Management, LLC to utilize that custodian for the Client's security transactions. For more information custodians and brokerage practices, see Item 12 - Brokerage Practices. While Alpha Investment Management, LLC does not have custody of Client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds Client assets. In certain jurisdictions this may be deemed constructive custody. Prior to permitting direct debit of fees each Client provides authorization in the form of agreements with Interactive Brokers permitting fees to be paid direct from the custodian. The custodian sends every Client an account statement not less than quarterly showing all account activity, including the amounts disbursed from the account to Alpha Investment Management, LLC.

Client's should always carefully review account statements received from their custodian to verify all fees including those disbursed from the account for Alpha Investment Management, LLC

Item 16 – Investment Discretion

Discretionary Portfolio Management – Alpha Investment Management, LLC has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Management Agreement containing all applicable limitations to such authority. All discretionary trades made by Alpha Investment Management, LLC will be in accordance with the Advisor's stated investment objectives and goals as it relates to the client's funds placed under management.

Item 17 – Voting Client Securities

Because Alpha Investment Management, LLC trades in ETFs and ETNs, it does not generally purchase any securities with voting rights in client's accounts.

Alpha Investment Management, LLC does not accept proxy voting responsibility for any Client. Therefore, although Alpha Investment Management, LLC may provide investment advisory services relative to Client investment assets, Alpha Investment Management, LLC Clients maintain exclusive responsibility for:

(1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Alpha Investment Management, LLC and/or the Client shall correspondingly instruct the Custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

Item 18 – Financial Information

A. Neither Alpha Investment Management, LLC, nor its management has any adverse financial situations that would reasonably impair the ability of Alpha Investment Management, LLC to meet all obligations to its Clients. Neither Alpha Investment Management, LLC, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Alpha Investment Management, LLC is not required to deliver a balance sheet along with this brochure as the firm does not collect advance fees more than \$500 per client for services to be performed six months or more in advance. Alpha Investment Management, LLC charges fees on a Quarterly or daily basis as of the end of the period. Alpha Investment Management, LLC does not charge in advance for services. Please see Item 5 - Fees and Compensation for additional information.

B. Alpha Investment Management, LLC does have discretionary authority over client securities. Therefore, Alpha Investment Management, LLC is required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. There are no such conditions to report at this time.

Item 19 – Requirements for State-Registered Advisors

A./B. The formal education and business background of both Eric James and Brannan Johnson as well as other business activities and the amount of time spent in those activities is presented in Form ADV Part 2B.

C. As owners of Alpha Investment Management, LLC both Eric James and Brannan Johnson personally benefit from the firm's performance based fees. Unless otherwise stated, these fees are calculated as 25% of the net gain above the trailing 12-month high water mark in each account. An example would be if you started with a \$100,000 account, which grew to \$200,000.

The advisor would then be transferred 25% of the profit (\$25,000) as its performance fee. A new high water mark would then be set at this after-fee point (\$175,000). The advisor now needs to perform in the account such that the account grows to more than \$175,000 in order to share in any further profits. Because the advisor only makes money in the case of a gain, this may create an incentive for the advisor to recommend to the client an investment that may carry a higher degree of risk.

Privacy Policy Effective: May 1, 2014

Our Commitment to You

Alpha Investment Management, LLC is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Alpha Investment Management, LLC (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust. We do not sell your non- public personal information to anyone. Nor does Alpha Investment Management, LLC provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

- Name and address • Assets
- E-mail address • Income
- Phone number • Account balance
- Social security or taxpayer identification number
- Investment activity
- Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That Alpha Investment Management, LLC Shares

Alpha Investment Management, LLC works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Alpha Investment Management, LLC's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non- public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not disclose your non-public personal information to anyone.

Information About Former Clients

Alpha Investment Management, LLC does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customer's non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties. These safeguards include keeping information in locking filing cabinets inside locked offices that have regular police patrols. Electronic safeguards include secure storage on password protected encrypted servers, as well as mandatory password protection on all computers, laptops, and mobile devices that may have access to customer's non-public information.

Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (303) 521-3561

Form ADV Part 2B – Individual Disclosure Brochure
For Eric James
Effective: July 1st, 2015

This brochure supplement provides information about Eric James that supplements the Alpha Investment Management, LLC firm brochure. You should have received a copy of that brochure. Please contact Alpha Investment Management, LLC at (303) 521-3561, if you did not receive Alpha Investment Management, LLC firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Eric James is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Eric James is currently one of two advisors to clients. Eric was born in 1982. After high-school Eric attended Colorado Film School's film studies certificate program which is the extent of his post-high school formal education. Eric is self-taught in the areas of Business and Finance. In addition to his role at Alpha Investment Management, LLC, he currently holds the position of Founder & CTO of PosterBrain, LLC, a Colorado based LLC that specializes in the printing industry. This position does not require a minimum qualification to achieve this designation. Eric spends less than 50% of his time in this business activity. Eric also currently holds the position as an LLC member of The Kronos Project, LLC, a Colorado based LLC that specializes in artificial intelligence software. This position does not require a minimum qualification to achieve this designation. Eric spends less than 50% of his time in this business activity.

Item 3 – Disciplinary Information

Alpha Investment Management, LLC and its advisory personnel value the trust you place in us. As we advise all clients, we encourage you to perform the requisite due diligence on anyone providing services to you.

On June 3rd, 2015 the SEC completed an examination of Alpha Investment Management, LLC and delivered the advisor a letter outlining matters for immediate corrective action. Based on this letter Alpha Investment Management, LLC has made modifications including changing to state registration, eliminating all non-compliant advertising materials, increasing ability for clients to impose reasonable restrictions on their account, adopting new policies and procedures to verify Qualified Client status, and updating the advisor's Form ADV. (This document). As chief compliance officer at the time of this examination, Eric was made aware of these issues as well as implementing the corrective actions.

There are no other legal or disciplinary events to disclose regarding Eric James.

However, we do encourage you to independently view the background of Eric James on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

Item 4 – Other Business Activities

Mr. James is not actively engaged with any other investment-related business or occupation.

Mr. James dedicates the necessary piece of his business time serving the needs of the advisory Clients of Alpha Investment Management, LLC. Mr. James shares all investment advisory and administrative functions within Alpha Investment Management, LLC.

Item 5 – Additional Compensation

Mr. James is compensated solely by Alpha Investment Management, LLC for the services provided to Clients. Mr. James does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of Alpha Investment Management, LLC.

Item 6 – Supervision

Mr. James serves as an investment advisory representative of Alpha Investment Management, LLC, as well as sharing in operational and administrative functions. Mr. James may be contacted directly at (303) 521-3561.

Alpha Investment Management, LLC has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Alpha Investment Management, LLC. Further, Alpha Investment Management, LLC is subject to regulatory oversight by various agencies. These agencies require registration by Alpha Investment Management, LLC and its employees. As a registered entity, Alpha Investment Management, LLC is subject to examinations by regulators, which may be announced or unannounced. Alpha Investment Management, LLC is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.

Form ADV Part 2B - Individual Disclosure Brochure
For Brannan Johnson
Effective: June 27, 2014

This brochure supplement provides information about Brannan Johnson that supplements the Alpha Investment Management, LLC firm brochure. You should have received a copy of that brochure. Please contact Alpha Investment Management, LLC at (303) 521-3561, if you did not receive Alpha Investment Management, LLC firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Brannan Johnson is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Brannan Johnson is currently one of two advisors to clients. A Colorado native born in Boulder, Brannan grew up in the front range. While attending early high school he started courses at the University of Colorado at Boulder in Aeronautical Engineering, enjoying a spot on a team to build a component for the Citizen Explorer Satellite; which was later put into orbit. He left school early to pursue professional athletics and ultimately won the World Cup Championship as a professional wakeboarder. After five years in this career he retired and returned to school, this time as a double major in Business and Economics where he was elected president of the National Economics Honor Society. In 2000 he started his first venture capital project - being responsible for bringing indoor skydiving to Colorado, and eventually in helping to design and build 21 other premier vertical wind tunnel facilities around the world.

Brannan prides himself on being a "super connector" in his community. He spends 10-20% of his time in this activity set.

Brannan is also a trained financial industry professional with 5+ years of financial services experience, certified as a Chartered Financial Consultant (ChFC). In addition to his role at Alpha Investment Management, LLC, He currently holds the positions of Founder at The Kronos Project, LLC, Investor at the Johnson Endeavor Group, LLC and Advisory Board Member at Inversoft. These positions do not require an minimum qualification to achieve this designation. Brannan spends less than 50% of his time in these other business activities.

Item 3 - Disciplinary Information

Alpha Investment Management, LLC and its advisory personnel value the trust you place in us. As we advise all clients, we encourage you to perform the requisite due diligence on anyone providing services to you. There are no legal or disciplinary events to disclose regarding Brannan Johnson.

However, we do encourage you to independently view the background of Brannan Johnson on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

Item 4 - Other Business Activities

Mr. Johnson is not actively engaged with any other investment-related business or occupation.

Mr. Johnson dedicates the necessary piece of his business time serving the needs of the advisory Clients of Alpha Investment Management, LLC. Mr. Johnson shares investment advisory and administrative functions within Alpha Investment Management, LLC.

Item 5 - Additional Compensation

Mr. Johnson is compensated solely by Alpha Investment Management, LLC for the services provided to Clients. Mr. Johnson does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of Alpha Investment Management, LLC.

Item 6 - Supervision

Mr. Johnson serves as an investment advisory representative of Alpha Investment Management, LLC, as well as sharing in operational and administrative functions. Mr. Johnson may be contacted directly at (303) 808-2150.

Alpha Investment Management, LLC has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Alpha Investment Management, LLC. Further, Alpha Investment Management, LLC is subject to regulatory oversight by various agencies. These agencies require registration by Alpha Investment Management, LLC and its employees. As a registered entity, Alpha Investment Management, LLC is subject to examinations by regulators, which may be announced or unannounced. Alpha Investment Management, LLC is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.