

**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Applicant: Synergy Investment Group, Inc.	SEC File Number: 801- 68315	Date: 3/30/09
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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Synergy Investment Group, Inc.		IRS Empl. Ident.No.: 56-2087980																														
Item of Form (identify)	Answer																															
ITEM 1D	<p>Synergy Investment Group, LLC, referred to as "the Company," intends to offer the following investment advisory services to clients.</p> <p>ASSETS UNDER MANAGEMENT</p> <p>The Company will provide asset management services to clients. The Company provides asset management of client's funds. The Company diversifies and manages the client's portfolio. Investments are determined based upon the client's investment objectives, risk tolerance, net worth, net income and other various suitability factors. The Company manages the client's accounts on an individualized basis. Further restrictions and guidelines imposed by clients affect the composition and performance of portfolios. For these reasons, performance of portfolios within the same investment objective may differ and clients should not expect that the performance of their portfolios will be identical with the average client of the Company.</p> <p>The client may grant the Company discretionary authority to buy and sell securities. If the client chooses to do so, the account may be managed on a non-discretionary basis.</p> <p>The fees for the above services are as follows:</p> <p>PORTFOLIO BALANCES</p> <table> <thead> <tr> <th>Asset Under Management</th> <th>Annual Fee</th> </tr> </thead> <tbody> <tr> <td>\$ 0 - \$ 249,999</td> <td>2.20%</td> </tr> <tr> <td>\$ 250,000 - \$ 749,999</td> <td>1.75%</td> </tr> <tr> <td>\$ 750,000 - \$1,999,999</td> <td>1.25%</td> </tr> <tr> <td>\$2,000,000 +</td> <td>0.75%</td> </tr> </tbody> </table> <p>In addition to the above fees, the account will be assessed a transaction charge to help defray the cost associated with trade execution. Transaction costs and billing procedures may vary according to custodian and services rendered. As such, transaction costs and billing procedures for assets held at Pershing, LLC and Penson Financial, Inc. are discussed separately.</p> <p>ASSETS UNDER MANAGEMENT CUSTODIED AT PERSHING, LLC.</p> <p>Mutual Funds</p> <p><i>Purchase or liquidation</i></p> <table> <tbody> <tr> <td>Retirement Account</td> <td>\$25.00</td> </tr> <tr> <td>Non-Retirement Account</td> <td></td> </tr> <tr> <td> Participating Funds</td> <td>\$25.00</td> </tr> <tr> <td> Non-Participating</td> <td>\$25.00</td> </tr> <tr> <td>Systematic Purchases and liquidations(only certain funds are eligible)</td> <td>\$6.00</td> </tr> <tr> <td>Exchanges (only certain funds are eligible)</td> <td>\$10.00</td> </tr> <tr> <td>Wire Purchase and redemption fees (if applicable)</td> <td>Varies</td> </tr> </tbody> </table> <p>Fixed Income</p> <table> <tbody> <tr> <td>Purchase</td> <td>\$35.00 + Variable charge per bond**</td> </tr> <tr> <td>Liquidation</td> <td>\$35.00 + Variable charge per bond**</td> </tr> <tr> <td>UIT Liquidation</td> <td>\$40.00</td> </tr> </tbody> </table>		Asset Under Management	Annual Fee	\$ 0 - \$ 249,999	2.20%	\$ 250,000 - \$ 749,999	1.75%	\$ 750,000 - \$1,999,999	1.25%	\$2,000,000 +	0.75%	Retirement Account	\$25.00	Non-Retirement Account		Participating Funds	\$25.00	Non-Participating	\$25.00	Systematic Purchases and liquidations(only certain funds are eligible)	\$6.00	Exchanges (only certain funds are eligible)	\$10.00	Wire Purchase and redemption fees (if applicable)	Varies	Purchase	\$35.00 + Variable charge per bond**	Liquidation	\$35.00 + Variable charge per bond**	UIT Liquidation	\$40.00
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	<p align="center">**Time left to maturity</p> <table> <tr> <td>Face Amount of Investment</td> <td>Less than 3 yrs.</td> <td>3-5 yrs.</td> <td>6-10 yrs.</td> <td>11+ yrs.</td> </tr> <tr> <td>0-50,0000</td> <td>No Var. Charge</td> <td>\$1.50</td> <td>\$2.00</td> <td>\$2.50</td> </tr> <tr> <td>51,000-100,000</td> <td>No Var. Charge</td> <td>\$1.25</td> <td>\$1.75</td> <td>\$2.00</td> </tr> <tr> <td>101,000-250,000</td> <td>No Var. Charge</td> <td>\$1.00</td> <td>\$1.25</td> <td>\$1.50</td> </tr> <tr> <td>251,000-500,000</td> <td>No Var. Charge</td> <td>\$0.75</td> <td>\$1.00</td> <td>\$1.25</td> </tr> <tr> <td>501,000+</td> <td>No Var. Charge</td> <td>\$0.40</td> <td>\$0.40</td> <td>\$0.40</td> </tr> </table> <p>For Foreign Currency Bonds and Zero Coupon Bonds, the variable charge is based on the dollars invested not the face amount, rounded to the nearest \$1,000.00.</p> <p>Equities Purchase \$20.00 + Variable Charge Liquidation \$20.00 + Variable Charge • The variable charge on equities is \$.025 per share</p> <p>Options Purchase \$20.00 + \$2.00 per contract Liquidation \$20.00 + \$2.00 per contract</p> <p>The fee is negotiable and payable in advance on a quarterly basis on the first day of the quarter. The contract may be terminated by any party effective upon receipt of written notice to the other parties. Upon termination, any unearned fees are refunded to the client prorated to the amount of days in the quarter in which the client received the Company's services. A full refund will be provided without penalty if the client terminates the contract, in writing, within five days of the contract being executed. All customer assets will be held by the custodian of the account. The Company will not hold customer funds or securities.</p> <p>The client may grant the Company the authority to receive quarterly payments directly from the client's account held by an independent custodian. Accordingly, the client will provide, in writing, limited authorization to withdraw the contractually agreed upon fees from the account. The Company will send to the client and the custodian a bill showing the amount of the fee, the value of client's assets on which the fee was based, and the specific manner in which the fee was calculated. The custodian of the account is advised in writing of the limitation on the Company's access to the account. The custodian will also send to the client a statement, at least quarterly, indicating all the amounts disbursed from the account including the amount of advisory fees paid directly to the Company.</p> <p>ASSETS UNDER MANAGEMENT CUSTODIED AT PENSON FINANCIAL, INC.</p> <table> <tr> <td>Equities</td> <td>Up to \$12.50</td> </tr> <tr> <td>Mutual Funds</td> <td>Up to \$25.00</td> </tr> <tr> <td>Bonds</td> <td>Up to \$50.00</td> </tr> <tr> <td>Options</td> <td>\$1.50 per contract + \$15.00</td> </tr> </table> <p>Fees are negotiable and are paid either quarterly or monthly based on the instructions of the client. The fee amount is negotiable and may be paid in advance or arrears based on the instructions of the client.</p>			Face Amount of Investment	Less than 3 yrs.	3-5 yrs.	6-10 yrs.	11+ yrs.	0-50,0000	No Var. Charge	\$1.50	\$2.00	\$2.50	51,000-100,000	No Var. Charge	\$1.25	\$1.75	\$2.00	101,000-250,000	No Var. Charge	\$1.00	\$1.25	\$1.50	251,000-500,000	No Var. Charge	\$0.75	\$1.00	\$1.25	501,000+	No Var. Charge	\$0.40	\$0.40	\$0.40	Equities	Up to \$12.50	Mutual Funds	Up to \$25.00	Bonds	Up to \$50.00	Options	\$1.50 per contract + \$15.00
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	<p>.The contract may be terminated by any party effective upon receipt of written notice to the other parties. Upon termination, any unearned fees are refunded to the client prorated to the amount of days in the quarter, if billed quarterly, or month, if billed monthly, in which the client received the Company's services. A full refund will be provided without penalty if the client terminates the contract, in writing, within five days of the contract being executed. All customer assets will be held by the custodian of the account. The Company will not hold customer funds or securities.</p> <p>The client may grant the Company the authority to receive quarterly payments directly from the client's account held by an independent custodian. Accordingly, the client will provide, in writing, limited authorization to withdraw the contractually agreed upon fees from the account. The Company will send to the client and the custodian a bill showing the amount of the fee, the value of client's assets on which the fee was based, and the specific manner in which the fee was calculated. The custodian of the account is advised in writing of the limitation on the Company's access to the account. The custodian will also send to the client a statement, at least quarterly, indicating all the amounts disbursed from the account including the amount of advisory fees paid directly to the Company.</p> <p>MARKET TIMING SERVICES</p> <p>The Company provides market timing services through its contractual agreements with Flexible Plan Investments, Ltd. and Portfolio Strategies. Flexible Plan and Portfolio Strategies will manage client assets on behalf of the Company. Clients utilizing this service will incur a negotiable fee for the assets being managed. The Company will receive a portion of the fee for referring clients to either one of the entities. The fee is paid quarterly in advance. In the event of termination, the client will receive a pro rata refund of the amount of the fee that has yet to be earned as of the date of termination.</p> <p>MANAGED ACCOUNT LINK PROGRAM ("MAL PROGRAM")</p> <p>The Company has an agreement with Lockwood Division of Pershing, LLC and Lockwood Advisors, Inc. (together, "Lockwood"). The Lockwood Division of Pershing, LLC is a registered broker dealer and investment advisor, which provides brokerage, investment advisory, supervisory and investment management services to clients and other financial services firms as the principal sponsor of managed account programs. Lockwood Advisors, Inc. is an investment advisory firm registered with the Securities and Exchange Commission and is an affiliate of Pershing, LLC.</p> <p>Lockwood will provide the Company or its associated persons, with money manager research, assets and style allocation and recommendation system with which the Company may generate proposals to its customers and which includes proprietary Lockwood research reports on money managers in the Program, and Lockwood's research and analysis. Lockwood will provide the Company with Lockwood's most recent copy of the Form ADV, Part II, including a Schedule H (the Wrap Fee Brochure) which the Company agrees to deliver, or have its associated persons deliver to the Company's clients.</p> <p>The Company will contractually arrange with each client who will open accounts under the Program to receive a fee. It is the Company's responsibility to inform Lockwood of what the Company's fee is on each client contract. If the Company maintains a policy that new account paperwork should be forwarded to the Company prior to its being sent to Lockwood, the Company agrees to assume joint responsibility with the Company's associated persons for ensuring that the</p>	

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	<p>account paperwork reaches Lockwood in a timely manner pursuant to the Rule 3(a)-4 delegations assumed by the Company on behalf of each associated persons.</p> <p>A breakdown of the fees for Lockwood's services is as follows:</p> <p>Lockwood Advisory Charge (Per Household)</p> <p>Equity</p> <table> <tr> <td><u>Under \$1 million</u></td> <td></td> <td><u>\$1 million to \$4,999,999</u></td> </tr> <tr> <td>First \$500,000</td> <td>.50%</td> <td>First \$1 million .4275%</td> </tr> <tr> <td>Next \$499,999</td> <td>.45%</td> <td>Next \$3,999,999 .36%</td> </tr> </table> <p><u>Over \$5 million</u></p> <table> <tr> <td>First \$5 million</td> <td>.33%</td> </tr> <tr> <td>Next \$1 million</td> <td>.26%</td> </tr> <tr> <td>Next \$2 million</td> <td>.25%</td> </tr> <tr> <td>Next \$2 million</td> <td>.24%</td> </tr> <tr> <td>Over \$10 million</td> <td>.22%</td> </tr> </table> <p>Fixed Income</p> <table> <tr> <td><u>Under \$1 million</u></td> <td></td> <td><u>\$1 million to \$4,999,999</u></td> </tr> <tr> <td>First \$500,000</td> <td>.25%</td> <td>First \$1 million .21375%</td> </tr> <tr> <td>Next \$500,000</td> <td>.225%</td> <td>Next \$4 million .18%</td> </tr> </table> <p><u>Over \$5 million</u></p> <table> <tr> <td>First \$5 million</td> <td>.18675%</td> </tr> <tr> <td>Over \$5 million</td> <td>.1575%</td> </tr> </table> <p>Money Manager</p> <p>Money managers ("Managers") are contractually engaged on behalf of, or by, the client for the day-to-day management of the client account(s). The fees for this service will vary as each Manager sets its fee independently. The Managers' fees, however, typically range between .20-.75% of assets annually on an account basis depending on the size of the client relationship and style of management</p> <p>Clearing and Transaction Charge</p> <p>There are charges for custody, clearing and execution provided by Pershing LLC. These fees are as follows:</p> <p>Equity Fixed Income</p> <table> <tr> <td>First \$250,000</td> <td>.25%</td> <td>.15%</td> </tr> <tr> <td>Next \$500,000</td> <td>.10%</td> <td>.10%</td> </tr> <tr> <td>Next \$1,000,000</td> <td>.08%</td> <td>.05%</td> </tr> <tr> <td>Next \$5,000,000</td> <td>.07%</td> <td>.04%</td> </tr> <tr> <td>Next \$10,000,000</td> <td>.06%</td> <td>.03%</td> </tr> <tr> <td>Over \$16,750,000</td> <td colspan="2">Negotiable</td> </tr> </table> <p>The minimal annual clearing charge per account is \$300.00. For certain institutional accounts in excess of \$5,000,000, a ticket charge of \$14 per transaction may be applicable.</p>		<u>Under \$1 million</u>		<u>\$1 million to \$4,999,999</u>	First \$500,000	.50%	First \$1 million .4275%	Next \$499,999	.45%	Next \$3,999,999 .36%	First \$5 million	.33%	Next \$1 million	.26%	Next \$2 million	.25%	Next \$2 million	.24%	Over \$10 million	.22%	<u>Under \$1 million</u>		<u>\$1 million to \$4,999,999</u>	First \$500,000	.25%	First \$1 million .21375%	Next \$500,000	.225%	Next \$4 million .18%	First \$5 million	.18675%	Over \$5 million	.1575%	First \$250,000	.25%	.15%	Next \$500,000	.10%	.10%	Next \$1,000,000	.08%	.05%	Next \$5,000,000	.07%	.04%	Next \$10,000,000	.06%	.03%	Over \$16,750,000	Negotiable	
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Synergy Investment Group, Inc.

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Item of Form
(identify)

Answer

Consulting Charge

The Company charge fees for its services, which will vary depending on various factors, including the size of the client's account relationship and the consulting services provided to clients. The Company may combine its fee with the other fees described above in an all-inclusive manner for presentation purposes.

MUTUAL FUND ACCESS PROGRAM

Lockwood offers the Mutual Fund Access Program (the "Program") which allows the client to select mutual funds to fill components of their overall investment strategy. Assets placed in the Program do not bear a Lockwood advisory charge.

The program consists of two levels of services, as follows:

(1) Fund Access includes access to all mutual funds available at Pershing ("Fundvest Funds"), with order entry through NetExchange Pro and processing of applicable fees by Lockwood. Lockwood does not charge an administrative fee related to this program.

(2) Fund Access Plus includes all of the Fund Access services (described above) plus consolidated performance reporting. Lockwood charges a 5 basis point administrative fee related to this program.

Accounts in the Program shall be available for viewing and monitoring through the Lockwood Advisor Workstation or other comparable Lockwood technology. The Company shall have discretionary trading authority with respect to mutual fund trades made on client's behalf in the Program.

The Company's Associated Persons may charge a fee to the client for this product, which fee will be billed directly by Lockwood to the client's mutual fund account(s), quarterly in advance. The Company understands that its Associated Persons shall be solely responsible for placing orders in the Mutual Fund Access Program via NetExchange Pro.

Program clearing costs for non-Fundvest Funds are \$30.00 per initial transaction and \$30.00 thereafter for same transactions; there are no transaction fees for Fundvest Funds. There are certain minimums and restrictions applicable to purchases of Fundvest Funds in the Program. There is a \$30.00 redemption fee for funds in the Program, which are liquidated, if they have been held for less than three (3) months. Initial purchases (exclusive of purchases in IRAs) must have a minimum size of \$2,500.00. Initial trades in IRAs must be a minimum of \$500.00. All subsequent purchases or sales for all types of accounts must have a minimum size of \$500.00.

Mutual funds, or other vehicles utilized by the Company, have charges and expenses, which are imposed independently from Lockwood. Said charges and expenses may include investment management, administrative and transaction expenses. Lockwood receives payment from certain mutual funds (typically 0.25%) which Lockwood uses to offset costs incurred in operating the Program. NetExchange Pro is the trading system through which mutual fund orders are placed. The fee associated with the use of NetExchange Pro is as follows:

\$2500 for a company with fewer than \$10 million in managed account assets.

No charge for a company with more than \$10 million in managed account assets.

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	<p>OVERLAY SEPARATE ACCOUNT PORTFOLIO (“OSAP”)</p> <p>Lockwood shall offer to the Company and its associated persons access to Lockwood’s proprietary OSAP product. The OSAP product is a multidiscipline account, with an Overlay Manager and with various submanagers providing strategy-specific models. The guidelines for the strategies employed by the Overlay Manager and the submanagers shall be provided by Lockwood, with Lockwood exercising discretion over the accounts established under this program.</p> <p>OSAP accounts shall be billed on a total fee basis, the components of which consist of the following:</p> <p>(1) Lockwood advisory fee; (2) Investment Manager(s) fee; (3) Company’s Associated Person’s fee for services; (4) Overlay Manager administrative fee; and (5) Clearing, custody and execution fee.</p> <p>Client accounts shall be billed quarterly in advance. Lockwood shall provide monthly custodial statements, access to online account viewing through Lockwood technology and performance on each selected strategy.</p> <p>TERMINATIONS</p> <p>Clients may terminate a managed account without penalty within 5 days of Lockwood’s execution of the client contract. Thereafter, clients may terminate accounts at any time in which case fees will be prorated through the termination date. All termination requests must come in writing from the client through the “Termination/Full Liquidation” Letter of Authorization form (LOA).</p> <p>For accounts that are terminated, but not liquidated, the manager will be terminated within 48 hours, upon which no further trading will occur. The Company must provide specific delivery instructions for the assets on the LOA, which will be processed after trades have settled and the account has been terminated.</p> <p>For accounts that are terminated and liquidated, the termination and liquidation request will be processed within 72 hours upon receipt of the signed LOA. The Company must provide specific delivery instructions for the assets, which will be processed after the account has been liquidated and trades have settled. Lockwood reserves the right to charge a termination fee of \$300 for accounts that terminate within 12 months of being opened.</p> <p>Since Lockwood typically charges quarterly in advance based on the inception assets as of the close of business the prior quarter, the daily proration upon termination will usually result in a rebate to the client of the unused portion of the Lockwood fee, the manager fee and the clearing fee.</p> <p>FINANCIAL PLANNING</p> <p>The Company offers written financial plans and consulting advice to clients encompassing the asset allocation, retirement planning, and other areas of interest to clients. Given the experience and knowledge level of the firm’s advisory representatives services, the range and nature of services offered may vary among the advisory representatives.</p>	

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	<p>Financial planning information will be obtained through personal interviews with each client concerning that client's current financial needs and circumstances. The Company performs due diligence about each client by requesting, reviewing and analyzing all of the client's relevant financial data and related documents.</p> <p>The Company charges an hourly fee of \$200 for preparation of an initial financial plan or other financial advice. However, the Company may discount this fee under the following situations:</p> <ul style="list-style-type: none"> Existing client with current assets under management; or Current or potential client having significant assets they may place to be managed. <p>The Company will charge fees for reviewing and updating the financial plan or financial advice, if applicable. The fees are on an hourly basis at a rate of \$150. The Company will provide an estimated total cost upon execution of the contract.</p> <p>Either party may terminate this agreement at any time without penalty upon written notice. Such termination shall not, however, affect liabilities or obligations incurred or arising from transactions initiated under this agreement prior to such termination. If the client terminates this agreement within five business days of its signing, the client will receive a full refund of all fees and expenses.</p> <p>A conflict of interest may exist between the interests of the Company and the interests of the clients. The client is under no obligation to act on the Company's recommendations. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transactions through an associated person of the Company when such person is employed as an agent of the broker dealer.</p> <p>GENERAL NOTES: Advisory fees charged are separate and distinct from the fees and expenses charged by mutual funds, which may be recommended to clients. Clients may incur certain charges imposed by third parties other than the Company. A description of these and expenses are available in each fund's prospectus. The Company will not be compensated on the basis of a share of capital gains or on capital appreciation of the funds or any portion of the funds of the client.</p> <p>All information and advice furnished by either party to the other, including their agents and employees, shall be treated as confidential and not disclosed to third parties except as agreed upon in writing or required by law.</p>	
ITEM 5		
ITEM 6	<p>The Company requires associated persons providing investment advice to possess the prerequisite requirements for conducting such activities. At a minimum, the Company requires individuals to have successfully completed state licensing requirements and to have successfully passed either the Series 65 or 66 examination requirements or qualify by exemption from such requirements from completing an appropriate professional designation.</p> <p>Timothy J. Bain YOB 1972 Education Background North Carolina State University 1994 BA/BS Raleigh, NC Business Management/Economics Business Background</p>	

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	<p>Synergy Investment Group, LLC 1998 - Present COO/FINOP JBS Liberty Securities, Inc. 06/07 - Present President LPL Financial 08/97 - 06/99 Investment Advisor Linsco/Private Ledger Corp. 08/97 - 06/99 Investment Representative</p> <p>Jeffrey D. Jones YOB: 1965 Education Background Pfeiffer University 1987 - BA Misenheimer, NC Criminal/Sociology Campbell University School of Law 1990 - JD Buies Creek, NC Law Business Background Synergy Investment Group, LLC 05/00 - Present General Counsel JBS Liberty Securities, Inc. 06/07 - Present Director Jones Law Firm 09/00 - Present Owner/Attorney</p> <p>Christopher J. Palladino YOB: 1962 Education Background Southeast Missouri State Cape Giravrdau, MO Pre-med./Chem./Bio. University of Missouri at St. Louis BS St. Louis, MO Finance Business Background Synergy Investment Group, LLC 07/98 - Present President JBS Liberty Securities, Inc. 06/07 - Present Director Linsco/Private Ledger Corp. 04/97 - 06/99 Investment Representative</p> <p>Eric C. Sides YOB: 1972 Education Background North Carolina State University 1995 - BA Raleigh, NC Accounting/Bus. Mgt. Business Background Synergy Investment Group, LLC 07/98 - Present SROP JBS Liberty Securities, Inc. 06/07 - Present Chief Operating Officer LPL Financial Services 10/97 - 06/99</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
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Continuation Sheet for Form ADV Part II**

Applicant: Synergy Investment Group, Inc.	SEC File Number: 801- 68315	Date: 3/30/09
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Item of Form (identify)	Answer	
ITEM 7ABC	Investment Representative Linsco/Private Ledger Corp. 10/97 - 06/99 Investment Representative Mark C. Wesley YOB: 1972 Education Background Marist College 1995 - BS Poughkeepsie, NY Math Business Background Synergy Investment Group, LLC 11/00 - Present SROP	
	Burt Medlin YOB: 1967 Education Background: No Post-High School Degree Business Background Synergy Investment Group, LLC 04/07-04/08; 10/08 – Present Chief Compliance Officer Synergy Investment Group, LLC 04/08 – 10/08 Compliance Specialist Synergy Investment Group, LLC 04/08 – 10/08 Director of Pershing Operations 1999-04/07	
	Associated persons of the Company may be associated with Synergy Investment Group, LLC, a Broker/Dealer registered with Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc. and various state regulatory bodies. In this capacity, associated persons of the Company in their capacity as a registered representative of Synergy Investment Group, LLC may be involved in the sale of various types of securities, including, but not limited to, stocks, bonds and mutual funds. Associated persons of the Company will spend approximately 85% of their time selling securities and managing securities business and 15% of their time providing investment advice and management.	
	The Company has established a fully disclosed clearing relationship with Pershing, LLC and Penson Financial Services, Inc. Under these arrangements, the Company serves as an introducing broker-dealer. The Company is under common control and ownership with JBS Liberty Securities, Inc., a registered broker dealer.	
ITEM 8C(1)	The Company has arrangements or professional alliances with investment companies and other investment advisers and professionals which are material to the Company's advisory business. Specifically, the firm has selling agreements with various mutual funds and has agreements with third party managers and platforms for which the firm's client can utilize these managers for portfolio management services.	
ITEM 8C (2&3)	The Company does have agreements in place with investment companies, whereby mutual funds can be purchased and managed by the Company while being directly held at the mutual fund company.	
	The Company may enter into arrangements with investment advisers under which the Company	

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ITEM 8C (9)	<p>may be a co-adviser or sub-adviser with respect to assets under management by another adviser, or under which shared roles and compensation arrangements are established.</p> <p>The Company has an agreement with Lockwood Division of Pershing, LLC and Lockwood Advisors, Inc. (together, "Lockwood"); the Lockwood division of Pershing, LLC is a registered broker dealer and investment advisor, which provides brokerage, investment advisory, supervisory and investment management services to clients and other financial services firms as the principal sponsor of managed account programs. Lockwood Advisors, Inc. is an investment advisory firm registered with the Securities and Exchange Commission and is an affiliate of Pershing, LLC. Lockwood will provide the Company or its associated persons, with money manager research, assets and style allocation and recommendation system (the Lockwood Proposal System") with which the Company may generate proposals to its customers and which includes proprietary Lockwood research reports on money managers in the Program, and Lockwood's research and analysis.</p>	
ITEM 9	<p>Associated persons of the Company are licensed to sell life and annuity insurance products through various companies. Associated persons of the Company may receive compensation for the sale of such products. The client is under no obligation to purchase insurance products through them and is free to choose the sources through which to implement investment advisory recommendations. Traditional insurance products may be offered through our affiliate, Synergy Insurance Group, Inc. or another agency.</p>	
ITEM 9B, 1C	<p>Code of Ethics Summary:</p> <p>Securities industry regulations require that advisory firms provide their clients with a general description of the advisory firm's Code of Ethics. The Company has adopted a Code of Ethics in compliance with 204A-1 in reference to the firm's controls over personal trading that sets forth the governing ethical standards and principals of the Company. It also describes, among other details, the Company's policies regarding the protection of confidential information, including the review of the personal securities accounts of certain personnel of the Company for evidence of manipulative trading, trading ahead of clients, and insider trading, trading restrictions, and recordkeeping. A copy of the Company's Code of Ethics may be obtained by writing to the Company.</p>	
ITEM 9E	<p>Associated persons of the Company, in their capacity as Registered Representatives of Synergy Investment Group, LLC, may effect various securities transactions for compensation for its clients. To the extent that an advisory client chooses to utilize Synergy Investment Group, LLC's services as a Broker/Dealer, associated persons of the Company may earn compensation in the form of brokerage commissions for any securities transactions effected in addition to advisory fees.</p> <p>Through its SIGNature account, representatives of the Company do not earn commissions on any transactions. These accounts are held at Pershing and are billed directly by Pershing. In other instances where the representative of the Company is managing assets held at either a mutual fund or annuity company, it is the Company's policy that if the representative earns a commission greater than 3% on the sale of said product and subsequently begins to manage the assets in that product, per a written agreement with the client, the representative cannot charge a fee to the client for a period of 12 months.</p> <p>The Company or its associated persons may buy or sell for it investment products recommended to clients. Client trades will be given priority over trades done for the Company or related persons. Records will be maintained of all securities or insurance products bought or sold by the Company,</p>	

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ITEM 10	associated persons or related entities. Such records will be available for inspection upon request.	
ITEM 11A	<p>Files of securities transactions effected for associated persons of the Company will be maintained for review should there be a conflict of interest. The Principal of the Company will review all securities transactions of related persons of the Company to ensure no conflicts exist with client executions.</p> <p>The Company requires a minimum account size of \$25,000 to open an account. This minimum requirement is negotiable. For accounts being managed by the Company with assets valued at less than \$100,000 at the end of the quarter will be assessed \$10.00.</p> <p>For the MAL program, the minimal annual clearing charge per account is \$300.00. For certain institutional accounts in excess of \$5,000,000, a ticket charge of \$14 per transaction may be applicable.</p> <p>For the Mutual Fund Access program, initial purchases (exclusive of purchases in IRAs) must have a minimum size of \$2,500.00. Initial trades in IRAs must be a minimum of \$500.00. All subsequent purchases or sales for all types of accounts must have a minimum size of \$500.00.</p> <p>Accounts are supervised continuously and formally reviewed quarterly, at a minimum, by the Chief Compliance Officer. There is no minimum number of accounts assigned for the reviewer. The review process contains each of the following elements:</p> <ul style="list-style-type: none"> a. assess client's goals and objectives; b. evaluate the strategy which has been employed; c. monitor the portfolio; and d. address the need to rebalance. 	
ITEM 11B	<p>Account reviews may be triggered by any one or more of the following events:</p> <ul style="list-style-type: none"> a. specific client request; b. activities in discretionary accounts.; and c. random and systematic sampling. 	
ITEM 12A	<p>All clients will receive no less than quarterly from the custodian a report which outlines the clients' current position, purchases and transactions, and current market value.</p>	
ITEM 12B	<p>The Company has authority to determine the type and amount of (1)(2)(3)(4) securities to be bought and sold, limited to mutual funds, the broker/dealer to be used and the commission rates to be paid without obtaining specific client consent. This authority shall be established upon execution by the agreements signed by client granting discretionary authority. The Company will consider, when making decisions for customer's accounts, such factors as price, the ability of the brokers to effect the transactions, the brokers' facilities, reliability and financial responsibility and any products or services provided by such brokers.</p> <p>Cash awaiting investment of reinvestment will be invested in Alliance Funds, which are money market funds or the Pershing Government Account.</p> <p>Associated persons of the Company, in their capacity as Registered Representatives of Synergy Investment Group, LLC, may recommend Synergy Investment Group, LLC's Broker/Dealer</p>	

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ITEM 13A	<p>services to clients who have or are utilizing the Company's advisory services. Also, if requested by the client, the Company will make specific recommendations from a group of broker dealers the Company has worked with. Broker/Dealers may be selected based upon product and cost to the client. In addition, the Company may look at their experience, past performance, and the ability to meet the client's needs. Clients are under no obligation to purchase or sell securities through Synergy Investment Group, LLC, however, if they chose to do so, commissions may be earned which may be higher or lower than other Broker/Dealers.</p> <p>Related persons of the Company when acting as registered representatives of Synergy Investment Group, LLC may receive 12b-1 fees for the sale of investment company products and commissions through the sale of securities and insurance products to clients of the Company. This may create a conflict of interest. Commission rates may be found at other broker/dealers which may be higher or lower than those charged by Synergy Investment Group, LLC. All accounts of the Company have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.</p> <p>Additional Disclosures</p> <p>PROXIES - Client understands and agrees that Client retains the right to vote on all proxies which are solicited for securities held in the account. SIG and IAR are hereby expressly precluded from voting proxies for securities held in the account and will not be required to take any action or render any advise with respect the voting of proxies.</p>	

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