

FORM ADV
Uniform Application for Investment Adviser Registration
Part II – Page 1

OMB APPROVAL	
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Name of Investment Adviser: Euro Pacific Capital, Inc.				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
88 Post Road, West, 3 rd Floor	Westport	CT	06880	(203) 662-9700

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any government authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.**

FORM ADV**Part II – Page 2**

Applicant:

Euro Pacific Capital, Inc.

SEC File Number:

801-69743

Date:

August 26, 2009

Definitions for Part II

Related person - Any officer, director or partner of applicant or any person directly or indirectly controlling, controlled by, or under common control with the applicant, including any non-clerical, non-ministerial employee.

Investment Supervisory Services - Giving continuous investment advice to a client (or making investments for the client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client's personal and family obligations.

1. **A. Advisory Services and Fees.** (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service.
(See instruction below.)

Applicant:

- | | | | | |
|-------------------------------------|-----|---|-----------|-------|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services | estimated | 100 % |
| <input type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services | | % |
| <input type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above | | % |
| <input type="checkbox"/> | (4) | Issues periodicals about securities by subscription | | % |
| <input type="checkbox"/> | (5) | Issues special reports about securities not included in any service described above | | % |
| <input type="checkbox"/> | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities | | % |
| <input type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities | | % |
| <input type="checkbox"/> | (8) | Provides a timing service | | % |
| <input type="checkbox"/> | (9) | Furnishes advice about securities in any manner not described above | | % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does the applicant call any of the services it checked above financial planning or some similar term?

Yes No
☐ ☒

C. Applicant offers investment advisory services for: (check all that apply):

- | | | | | | |
|-------------------------------------|-----|--|--------------------------|-----|-------------------|
| <input checked="" type="checkbox"/> | (1) | A percentage of assets under management | <input type="checkbox"/> | (4) | Subscription fees |
| <input type="checkbox"/> | (2) | Hourly charges | <input type="checkbox"/> | (5) | Commissions |
| <input type="checkbox"/> | (3) | Fixed fees (not including subscription fees) | <input type="checkbox"/> | (6) | Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. **Types of Clients** - Applicant generally provides investment advice to: (check those that apply)

- | | | | | | |
|-------------------------------------|----|----------------------------------|-------------------------------------|----|---|
| <input checked="" type="checkbox"/> | A. | Individuals | <input checked="" type="checkbox"/> | E. | Trusts, estates, or charitable organizations |
| <input type="checkbox"/> | B. | Banks or thrift institutions | <input checked="" type="checkbox"/> | F. | Corporations or business entities other than those listed above |
| <input type="checkbox"/> | C. | Investment companies | <input type="checkbox"/> | G. | Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> | D. | Pension and profit sharing plans | | | |

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Equity Securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input checked="" type="checkbox"/> I. Options contracts on: |
| <input checked="" type="checkbox"/> (3) foreign issues | <input checked="" type="checkbox"/> (1) securities |
| | <input checked="" type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> B. Warrants | |
| <input checked="" type="checkbox"/> C. Corporate debt securities
(other than commercial paper) | <input checked="" type="checkbox"/> J. Futures contracts on: |
| | <input checked="" type="checkbox"/> (1) tangibles |
| <input checked="" type="checkbox"/> D. Commercial paper | <input checked="" type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| <input type="checkbox"/> G. Investment company securities | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> (2) variable annuities | |
| <input checked="" type="checkbox"/> (3) mutual fund shares | <input checked="" type="checkbox"/> L. Other (explain on Schedule F) |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Charting | (4) <input checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the
Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input type="checkbox"/> Corporate rating services | (8) <input checked="" type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (4) <input checked="" type="checkbox"/> Short sales | |

Applicant:

Euro Pacific Capital, Inc.

SEC File Number:

801-69743

Date:

August 26, 2009

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?

Yes No
☒ ☐

(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- Each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- Each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- | | |
|-----------------|--|
| • Name | • formal education after high school |
| • Year of birth | • business background for the preceding five years |

7. Other Business Activities. (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☒ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☒ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?

Yes No
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

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9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☒ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☒ B. As broker or agent effects securities transactions for compensation for any client.
- ☒ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☒ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes

☒

No

☐

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and Triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

See Schedule F.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

See Schedule F.

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold?

Yes No

☒ ☐

(2) amount of the securities to be bought or sold ?

Yes No

☒ ☐

(3) broker or dealer to be used ?

Yes No

☒ ☐

(4) commission rates paid?

Yes No

☒ ☐

B. Does applicant or a related person suggest brokers to clients?

Yes No

☒ ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, Describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients?

Yes No

☒ ☐

B. Directly or indirectly compensates any person for client referrals?

Yes No

☐ ☒

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?

Yes No

☐ ☒

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Euro Pacific Capital, Inc.	801-69743	August 26, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
Item 1.D	<p>INVESTMENT MANAGEMENT SERVICES</p> <p>Euro Pacific Capital (“Adviser”), who is also registered as a full service broker-dealer with the Financial Industry Regulatory Authority (FINRA), offers investment management and supervisory services to individuals, retirement plans, trusts and corporations on a discretionary basis. When an advisory account is opened, the Adviser will perform an assessment of the client’s financial information, which will include, but not be limited to the client’s overall investment objectives, tax considerations, risk tolerance and any investment restrictions the client may have. From there, the Adviser will develop a written investment policy statement (“IPS”) that reflects the client’s investment objective and performance goals for the assets to be managed by the Adviser, and also includes their risk profile, liquidity needs, general time horizon, tax considerations, legal considerations and any special investment circumstances. (Please note: the Adviser does not provide specific legal or tax related advice and clients should consult their independent tax and/or legal practitioners for such advice.) The IPS is then used to implement and monitor the investments in a client’s account. Generally, the Adviser believes it can best meet the financial needs of its clients by building a portfolio of investments that they believe are best suited for the economic climate and in line with each IPS.</p> <p>In some cases, the Adviser may enter into written sub-advisory agreements with third party advisers (“Sub-Advisers”) in order to make available certain investment strategies for client accounts. The investment management agreement between the Adviser and the client (the “IM Agreement”) gives the Adviser the authority and discretion in determining which Sub-Adviser(s) to use and the amount of client assets that will be managed by such Sub-Adviser(s). The Adviser will remain the primary investment manager of client’s account and will pay the Sub-Adviser fees from the Adviser’s management fees listed below. All Sub-Advisers will be licensed or registered as investment advisers or exempt from such registration.</p> <p>If the account is a pension or other employee benefit plan governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”), the Adviser acknowledges that it is a fiduciary to the plan as such term is defined under Section 3(21)(A) of ERISA. In providing its services, the sole standard of care imposed upon the Adviser is to act with the care, skill, prudence and diligence under the circumstances then prevailing that a prudent man acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims.</p>

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Euro Pacific Capital, Inc.	801-69743	August 26, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
---	-----------------------

Item of Form (identify)	Answer												
Item 1.D (cont.)	<p>Management Fees and Other Charges</p> <p>Fees based on a percentage of assets under management: The Adviser's management fees ("Fees") that are based on a percentage of assets under management are as follows:</p> <table><tr><th>Account Assets Valued At:</th><th>Basic Annual Fee Schedule</th></tr><tr><td>First \$250,000</td><td>2.00%</td></tr><tr><td>Next \$250,000</td><td>1.75%</td></tr><tr><td>Next \$250,000</td><td>1.50%</td></tr><tr><td>Next \$250,000</td><td>1.25%</td></tr><tr><td>Any additional amount over \$1 million</td><td>1.00%</td></tr></table> <p>The actual Fees charged to a client will be set forth in the IM Agreement. The Adviser reserves the right to negotiate Fees with clients, and may charge higher or lower Fees than those described above. The Fees are subject to change with sixty (60) days prior written notice to the client.</p> <p>The fee will be calculated and billed quarterly in advance based upon the value of the Account as of the close of business on the last business day of the previous calendar quarter, provided, however, that with respect to the initial fee, the fee shall be based upon the value of the Account as of the day the Account's assets are placed under the supervision of the Manager, prorated for the balance of the calendar quarter based upon a ninety (90) day quarter. The fair market value of the assets in the Account shall be determined by the Custodian in accordance with its standard policies and practices, provided, however, that in the event the Custodian does not provide a value for any asset(s) in the Account, such asset(s) shall be valued at such market value as is determined in good faith by the Manager. In the event that assets are added to the Account during a calendar quarter, no advisory fee shall be payable with respect to such assets until the commencement of the following quarter. In the event of the withdrawal of assets from the Account during a calendar quarter, no refund shall be made of any advisory fee paid in advance with respect to such assets, except that if the entire Account is terminated, a pro rata refund of such fees shall be made.</p> <p>The IM Agreement gives the Adviser authority to instruct the client's custodian to pay the Fees to the Adviser directly from the client's account assets. Euro Pacific Capital will send an account statement to each client, at least quarterly, indicating the amounts withdrawn from the account including the amount of advisory fees paid directly to the Adviser.</p>	Account Assets Valued At:	Basic Annual Fee Schedule	First \$250,000	2.00%	Next \$250,000	1.75%	Next \$250,000	1.50%	Next \$250,000	1.25%	Any additional amount over \$1 million	1.00%
Account Assets Valued At:	Basic Annual Fee Schedule												
First \$250,000	2.00%												
Next \$250,000	1.75%												
Next \$250,000	1.50%												
Next \$250,000	1.25%												
Any additional amount over \$1 million	1.00%												

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Euro Pacific Capital, Inc.	801-69743	August 26, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 1.D (cont.)	<p>Other Fees and Charges</p> <p>Clients should understand that the Fees described above do not include custodian fees. Clients should further understand that any brokerage commissions, transactions charges, stock transfer fees, and other similar charges that may be incurred in connection with transactions for a client's account will be paid out of the assets in the account and are in addition to the Fees paid to the Adviser. The fees and costs of any mutual fund or exchange traded fund in which a client's account may invest will not be deducted from the compensation that a client pays to the Adviser for its services. These fees and expenses are outlined in the relevant fund prospectus and statement of additional information.</p> <p>Termination of IM Agreement</p> <p>Within five (5) business days after the date of execution of the IM Agreement, a client will have the right to terminate the IM Agreement without penalty or liability for payment of fees. (Provided however, any investment action taken by the Adviser regarding the client's account prior to the effective date of such termination shall be at client's risk.) After the expiration of that period, either party may terminate the agreement at any time by giving at least 10 business day's written notice of such termination to the other party. Upon termination, all unearned prepaid fees will be promptly refunded to the client. The Adviser does not charge any termination fees. In the event a client terminates the agreement, the Adviser will not liquidate the account unless directed to do so by the client in writing. Clients should understand that in the event a client requests that their account(s) be fully liquidated, it may take the Adviser a number of days or more to sell all the securities in the account(s) depending on the types of securities in a client's account. In the event of a client's death or disability, the Adviser will continue to manage the account until such time as Adviser is notified of client's death or disability and given alternative instructions by an authorized party.</p> <p>Proxy Voting Policy</p> <p>The Adviser's policy is to not vote proxies on behalf of its clients and therefore, shall have no obligation or authority to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held in a client's account, unless the account is an ERISA account and such authority has not been delegated to another named fiduciary in the plan's written documents. Otherwise, the obligation to vote client proxies shall, at all times, rest with the client. The Adviser shall not be deemed to have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client. Proxies issued on securities held by a registered investment company (i.e. mutual fund) are generally voted by the investment adviser that manages the assets of the mutual fund.</p>	

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Euro Pacific Capital, Inc.	801-69743	August 26, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 1.D (cont.)	<p>Class Action Filings</p> <p>A securities “class action” lawsuit is a civil suit brought by one or more individuals (“Plaintiffs”) on behalf of themselves and others who have the same grievance against the issuer of a certain security. When a class action is filed, a written notice of filing and/or settlement is prepared (the “Notice”), which outlines the reasons for the lawsuit, the parameters for qualification as a member of the class and certain legal rights that need to be considered before becoming a member of the class (i.e. participating in the settlement).</p> <p>In addition, the Notice will contain instructions issued by the court to broker/dealers and/or other nominees (e.g. custodians) who receive the Notice and who hold the security on behalf of the owner/beneficiary, to either (1) provide the Claims Administrator (usually the attorney for the Plaintiffs) with the name and address of each such owner/beneficiary so the Claims Administrator can send the Notice directly to such owner/beneficiary, or (2) request additional copies of the Notice and send the Notice directly to the owner/beneficiary.</p> <p>In some cases, in addition to the owner/beneficiary, the Adviser may also receive notification of a class action. Since, as described above, the broker/dealer, nominee or Claims Administrator is responsible for sending the Notice to the owner/beneficiary of the security, and the Adviser does not hold securities on behalf of its clients, the Adviser does not send any additional notification to its clients.</p> <p>Because each class action involves certain legal rights that must be considered by the owner/beneficiary of the security before becoming a member of the class, the Adviser cannot instruct, or give advice to its clients on whether or not to participate as a member of the class and will not automatically file claims on the client’s behalf. However, if a client notifies the Adviser that they wish to participate in a class action, the Adviser will provide the client with any transaction information pertaining to the client’s account with the Adviser that may be needed in order for the client to file a proof of claim in a class action.</p>	
Item 3.L	<p>TYPES OF INVESTMENTS</p> <p>In addition to the types of securities listed in Item 3 above, the Adviser may invest client assets in exchange traded funds (ETFs) and different types of private placements and other limited offerings, such as initial public offerings (IPOs). There may be times when some of the private placements and/or IPOs that the Adviser invests client assets in are obtained through Euro Pacific Capital, Inc.’s investment banking division or where Euro Pacific Capital, Inc. as a registered broker-dealer services as one of the placement agents (or lead placement agent) for the issuer of the private placement or IPO. In both cases, Euro Pacific Capital, Inc. will receive compensation from the issuer of the securities for providing such services. Although the Adviser will only invest a client’s assets in such limited offerings if the Adviser deems the investment suitable for the client’s account, clients should be aware that the</p>	

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

Applicant:

Euro Pacific Capital, Inc.

SEC File Number:

801-69743

Date:

August 26, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 4.A.	<p>additional compensation that the firm will receive creates a conflict of interest between the Adviser and those clients investing in the limited offerings.</p> <p>METHODS OF ANALYSIS</p> <p>The Adviser's investment committee identifies major global macro investment themes as a basis for long-term investing. However, Adviser uses both fundamental and technical analysis in the ongoing management of client accounts. The fundamental approach emphasizes top-down analysis with a focus on country outlook, industry outlook, and then asset class valuations vs. historical norms as well as other investment criteria.</p>	
Item 4.B.	<p>SOURCES OF INFORMATION</p> <p>In performing its research, the Adviser may use periodicals and newspapers, such as The Economist, The Wall Street Journal, Investor's Business Daily, Barron's, and Forbes. Numerous websites, such as www.wsj.com, Yahoo! Finance, Google Finance are also used.</p>	
Item 4.C	<p>INVESTMENT STRATEGIES</p> <p>In addition to the types of investment strategies listed in Item 4 above, the Adviser may, in limited circumstances, invest in ETFs that have a short bias.</p>	
Item 5	<p>EDUCATION AND BUSINESS STANDARDS</p> <p>Euro Pacific Capital requires the following standards of education or business experience for its investment adviser representatives (IARs):</p> <ol style="list-style-type: none">1. Bachelors Degree in Finance, Accounting, or Business Administration or Management2. Successful completion of the:<ul style="list-style-type: none">• Series 7 - General Securities Representative Examination• Series 65 - Uniform Investment Advisor Law Examination (or equivalent) <p>In certain circumstances, additional qualifications may be required, such as:</p> <p>Master degree in Business Administration (MBA) Chartered Financial Analyst (CFA) Designation.</p>	
Item 6	<p>EDUCATION AND BUSINESS BACKGROUND</p> <p>Investment Committee Members:</p>	

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Euro Pacific Capital, Inc.	801-69743	August 26, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 6 (cont.)	<p>Peter Schiff President & Chief Global Strategist Born: 1963 <i>Educational Background:</i></p> <ul style="list-style-type: none"> • B.A. in Finance and Accounting, University of California, Berkley, 1987 • FINRA Series 4, 7, 24, 27, 53, 55, & 63 licenses. <p><i>Business Background:</i></p> <ul style="list-style-type: none"> • Euro Pacific Capital, Inc., President & Chief Global Strategist, 01/2000 to present <p>Jim Nelson, Portfolio Manager Born: 1978 <i>Educational Background:</i></p> <ul style="list-style-type: none"> • B.S. in Management, United States Air Force Academy, 2000 • MBA, California State University, Long Beach, 2005 • FINRA Series 7, 63, 65, 87 licenses. • Chartered Financial Analyst (CFA) <p><i>Business Background:</i></p> <ul style="list-style-type: none"> • US Air Force, Captain, Finance, Flight Commander, Misawa, Japan, 07/2004 to 08/2007 • ROTH Capital Partners, Associate Equity Research Analyst, 07/2007 to 10/2008 • Euro Pacific Capital, 11/2008 to present 	
Item 7.	<p>OTHER BUSINESS ACTIVITIES</p> <p>The Adviser also is registered as a full service broker-dealer with FINRA and spends at least 38% of its time on providing brokerage services to clients. As a full service broker-dealer, Euro Pacific Capital, Inc. sells a variety of products and services to its brokerage clients. In addition, a number of employees of Euro Pacific Capital, Inc., including those listed in item 6 above, also will be performing various advisory services in addition to their brokerage services. However, the Advisers IARs will not receive any commissions on transactions in advisory client accounts.</p> <p>The Adviser, as a registered broker-dealer, participates in the Perth Mint Certificate Program. Through this program, Euro Pacific Capital, Inc. sells gold certificates for bullion stored at the Perth Mint in Western Australia.</p> <p>The Adviser owns 40% of Euro Pacific Halter Asia Management, Inc., a SEC registered investment adviser that will manage the assets of the Euro Pacific Halter China Fund ("China Fund"), a newly registered open end mutual fund. Euro Pacific Capital, Inc., as registered broker-dealer, intends to enter into a selling agreement with the China Fund and will be the primary method of distribution for the China Fund. Euro Pacific Capital, Inc., as a registered investment adviser, will not be</p>	

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Euro Pacific Capital, Inc.	801-69743	August 26, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
	providing any services to the China Fund.	
	Peter Schiff, the firm's President and Investment Committee Chair, has announced his 2010 candidacy for the United States Senate in Connecticut. Peter Schiff will remain President of Euro Pacific Capital during his candidacy and will continue to serve as the firm's Investment Committee Chair, however he will also be devoting considerable amount of time to the campaign.	
Item 8	OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS	
	As stated above, Euro Pacific Capital, Inc. is also a registered broker-dealer with FINRA and also owns 40% of Euro Pacific Halter Asia Management, Inc.	
Item 9.	PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS	
	Principal Trades and Cross Transactions	
	There may be times when the Adviser feels it is in the best interest of certain clients to execute a riskless principal transaction (i.e. where Euro Pacific, acting as broker-dealer, purchases a security from one advisory client into its inventory but then at the same time sells the security out of its inventory to another advisory or brokerage client.) The Adviser also may, if the Adviser deems it is in the best interest of certain clients, perform an agency cross transaction (i.e. where Euro Pacific, acting as broker-dealer, sells a security from one advisory account to another advisory account and receives a brokerage commission). There may also be times when the Adviser feels it is in the best interest of clients to perform internal cross transactions (i.e. where Euro Pacific, acting as adviser, sells a security from one advisory account to another advisory account, but does not receive any type of commission or other fee, other than its regular management fee). The Adviser's practice is to engage in these types of transactions in very limited circumstances and will adhere to all applicable regulations, including disclosures to clients and the receipt of client consent.	
	Code of Ethics	
	The Adviser and certain supervised persons associated with the Adviser (collectively defined as "Access Persons") may buy or sell the same securities that the Adviser also buys and sells for its clients. This is permissible so long as the Access Persons adhere to the Adviser's written policies and procedures that are outlined in the Adviser's Code of Ethics. These policies and procedures of are summarized below:	
	Under the Code, Access Persons are prohibited from placing certain transactions	

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Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
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1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 10.	<p>without obtaining written approval prior to effecting transactions in certain securities in their personal accounts. In addition, Access Persons are required to submit certain periodic reports regarding securities transactions and holdings in their personal accounts.</p> <p>Under certain limited circumstances, exceptions may be made to the policies and procedures in the Code for certain transactions. The Adviser will maintain records of these transactions, including the reasons for any exceptions.</p> <p>CONDITIONS FOR MANAGING ACCOUNTS</p> <p>In order to become a Euro Pacific Capital advisory client, initial client household balances (sum of all accounts) generally must contain a minimum of \$100,000 in assets. Accounts below this minimum may be negotiable and accepted on an individual basis at the Adviser's discretion. In addition, the minimum amount may be adjusted upwards during periods of high market volatility to allow for more time to be dedicated to managing existing clients' assets.</p> <p>There may be times when certain restrictions are placed by a client, which prevents the Adviser from accepting or continuing to manage the account. The Adviser reserves the right to not accept and/or terminate management of a client's account if it feels that the client imposed restrictions would limit or prevent it from meeting and/or maintaining its overall investment strategy.</p> <p>Prior to entering into an agreement with the Adviser, the client should carefully consider: 1) committing to management only those assets that the client believes will not be needed for current purposes and that can be invested on a long-term basis, usually a minimum of five to seven years, 2) that volatility from investing in the stock market can occur, and 3) that over time the client's assets may fluctuate and at anytime be worth more or less than the amount invested.</p>	
Item 11.A. & B.	<p>REVIEW OF ACCOUNTS</p> <p>Accounts are reviewed on an ongoing basis to ensure their conformity with the client's IPS. The review process is based on a variety of factors, which include but are not limited to: the client's investment objectives, the economic environment, outlook for the securities markets and the merits of the securities in which the accounts are invested. In addition, a special review of an account may be triggered by one or more of the following: 1) a change in the client's investment objectives, guidelines and/or financial situation communicated by the client, 2) change in diversification, 3) tax considerations, 4) cash added or withdrawn from account, 5) purchase or sale of a security in the account, 6) a major change in the market, and 7) if requested by a client. Reviews of accounts are usually performed by the IAR assigned to the account. There is no maximum amount of accounts that could be</p>	

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1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
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Item 12.	<p>assigned to each IAR.</p> <p>The IAR will perform one-on-one client portfolio reviews with the clients at least annually. Clients are encouraged to contact Euro Pacific Capital anytime via email or phone to address any questions or concerns. Clients also will receive monthly and/or quarterly account statements from Euro Pacific Capital and from their custodian.</p> <p>INVESTMENT AND BROKERAGE DISCRETION</p> <p>Unless specifically agreed upon in advance in writing, the Adviser has the discretionary authority, via the IM Agreement, to determine without obtaining prior specific consent: 1) the securities to be bought and sold in the account, 2) the amount of securities to be bought and sold in the account, 3) the broker-dealers through which transactions will be executed, 4) whether a client's transaction should be combined with those of other clients and traded as a "block", and 5) the commission rates paid to effect the transactions. However, the Adviser's discretionary authority may be subject to certain conditions that are imposed by a client, such as where the client prohibits transactions in securities of a specific company and/or industry in the account.</p> <p>The Adviser's intention is to keep all clients informed, usually via email updates and published reports on the Internet, of the basic structure of investment portfolios and any possible future changes that may be made to those portfolios. Investment and brokerage discretion is maintained legally in order to facilitate the ability to make changes quickly to client accounts should market conditions warrant. The intent of discretion is one of speed and efficiency rather than a desire to reduce communication and interaction with clients. Prospective clients are encouraged to discuss the use of the Adviser's discretion in managing their accounts prior to becoming a client. Discretion is used primarily for the timing, magnitude, and scope of portfolio changes. The Adviser maintains an open door policy in terms of the client's ability to ask questions concerning their account(s) or their current investment strategy. In order to faithfully execute a fiduciary duty and allocate the proper amount of time to investment research and client account management, the Adviser must attempt to find a real-world balance between one-on-one client interaction and maintaining a focus on the primary task of money management.</p> <p>Through the IM Agreement, clients have granted trading authority to the Adviser and its IARs. Since the Adviser is compensated 100% on the value of the client's account, the Adviser is financially motivated to reduce third-party custodial fees (just as an individual investor would be). The Adviser feels the way to make a prudent business decision on third-party custodial fees (or any third-party fee) is to review the fee in terms of the percentage of the client's principal.</p> <p>As an investment advisory firm, Euro Pacific Capital has a duty to seek best execution</p>	

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Continuation Sheet for Form ADV Part II

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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 12 (cont.)	<p>for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions of the market at the time the trade is placed, including the float and efficiency of the market, and the need of the particular client. The Adviser seeks to obtain best execution for its clients' transactions, which may not necessarily mean the best price or lowest commission available but the best overall qualitative execution in the particular circumstances.</p> <p>The Adviser requires clients to custody their assets with a third-party custodian/broker chosen by the Adviser ("Custodial Broker"). Factors considered by the Adviser in choosing the Custodial Broker are based upon, but not limited to, the reasonableness of their commissions, product availability, research and other services available to both the client and the Adviser (Please refer to item 13A below for additional information). The Adviser continually attempts to obtain any and all services available from the Custodial Broker.</p> <p>Soft Dollar Considerations</p> <p>Except for the indirect benefits that the Adviser may receive from Custodial Brokers, which may be deemed to fall outside the safe harbor of Section 28(e) of the Exchange Act ("Section 28(e)"), the Adviser's general policy is to comply with the provisions of Section 28(e) when entering into soft dollar arrangements. Section 28(e) generally allows investment advisers to use client commissions to pay for certain brokerage and research services under certain circumstances without breaching their fiduciary duties to clients. Therefore, the Adviser may, in circumstances where the Adviser has brokerage discretion and in which execution is comparable, place trades with a third party broker that is providing brokerage and research services to the Adviser ("Research Broker"). Brokerage and research services provided by Research Brokers may include, among other things, effecting securities transactions and performing services incidental thereto (such as clearance, settlement and custody) and providing information regarding the economy, industries, sectors of securities, individual companies, statistical information, taxation; political developments, legal developments, technical market action, pricing and appraisal services, credit analysis; risk measurement analysis and performance analysis. Such research services can be received in the form of written reports, telephone conversations, personal meetings with security analysts and/or individual company management, and attending conferences. The research services provided by a Research Broker may be proprietary and/or provided by a third party (i.e. originates from a party independent from the broker provided the execution services).</p> <p>In selecting a Research Broker, the Adviser will make a good faith determination that</p>	

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Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
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1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
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Item 12 (cont.)	<p>the amount of the commission charged is reasonable in relation to the value of the brokerage and research services received, viewed in terms of either the specific transactions or the Adviser's overall responsibility to the accounts for which it exercises investment discretion. Subject to Section 28(e), the Adviser may pay a Research Broker a brokerage commission in excess of that which another broker might have charged for effecting the same transaction, in recognition of the value of the brokerage and/or research services provided by the broker. This practice is commonly referred to as "soft dollars". The Adviser believes it is imperative to its investment decision-making process to have access to this type of research and brokerage.</p> <p>Research services provided by Research Brokers may be used by the Adviser in servicing any or all of the Adviser's clients, and may be used in connection with clients other than those making the payment of commissions to a Research Broker, as permitted by Section 28(e). In other words, there may be certain client accounts that benefit from the research services, which did not make the payment of commissions to the Research Broker providing the services. The receipt of brokerage and research services from any broker executing transactions for the Adviser's clients will not result in a reduction of the Adviser's customary and normal research activities, and the value of such information is, in the Adviser's view, indeterminable. Nevertheless, the receipt of such research may be deemed to be the receipt of an economic benefit by the Adviser, and although customary, may be deemed to create a conflict of interest between the Adviser and its clients. Therefore, the Adviser feels it is important for clients to be aware of the issues surrounding "soft dollars".</p> <p>There may be cases when the Adviser may receive both non-research (e.g. administrative or accounting services etc.) and research benefits from the services provided by the Research Brokers. If and when this happens, the Adviser will make a good faith allocation between the non-research and research portion of the services received, and will pay "hard dollars" (i.e. the Adviser will pay from their own monies) for the non-research portion. In making a good faith allocation between research services and non-research services, a conflict of interest may exist by reason of the Adviser's allocation of the costs of such services and benefits between those that primarily benefit the Adviser and those that primarily benefit clients. The Adviser will always put the client's interests first.</p> <p>Trade Aggregation</p> <p>On some occasions the Adviser will execute client transactions on a block or aggregate basis. That is, they enter one large trade and allocate the shares among various client accounts. This technique may allow the Adviser to execute transactions in a more timely, equitable and efficient manner in an attempt to achieve a better overall price execution for a group of clients. The Adviser's policy is to engage in this technique when it's deemed to be in the best interest of clients. Clients</p>	

**Schedule F of
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Applicant:

Euro Pacific Capital, Inc.

SEC File Number:

801-69743

Date:

August 26, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 12 (cont.)	<p>participating in any aggregated transactions will receive an average share price on a pro-rata basis.</p> <p>Trade Allocation</p> <p>The Adviser's trade allocation policies and procedure call for a fair and equitable method of allocating trades among accounts with no particular client(s) or groups of clients being favored or disfavored. Generally the Adviser must identify a given block trade allocation before that trade is entered. If the trade is filled as entered, the Adviser must allocate according to the pre-determined block. If issues arise relating to successfully filling such allocation pursuant to the pre-determined block, the Adviser will allocate the shares in a fair and equitable manner and document the rationale for deviating from the pre-determined allocation.</p> <p>Allocation of Initial Public Offerings and Private Offerings</p> <p>The Adviser may, from time to time, when consistent with a client's investment objectives and restrictions, purchase a security in an initial or secondary public or private offering ("IPO" or "PIPE") for certain client accounts. When this occurs it is the Adviser's intention to allocate shares among participating accounts in an equitable manner as not to give one client preference over another. The Adviser will generally allocate shares based on the amount deemed appropriate for each client. In most cases, for each client this will be the number of shares pertaining to a dollar value derived by applying a consistent percentage over each client's account value. If the Adviser does not receive a full allocation, then the shares will be allocated to accounts on a pro rata basis. The Adviser reserves the right to make exceptions to this policy if it believes it is in the best interest of clients to do so.</p> <p>Trade Errors</p> <p>Euro Pacific Capital has the responsibility to execute orders correctly, promptly and in the best interest of clients. In the event an error occurs in the handling of a trade due to Euro Pacific Capital or advisor's action or inaction, Euro Pacific Capital will seek to promptly identify and correct such error without disadvantaging the client or clients involved.</p>	
Item 13	<p>ADDITIONAL COMPENSATION</p> <p>The Custodial Broker may provide the Adviser with access to their institutional trading and custody services, which are typically not available to retail investors. These services are generally available to independent investment advisors on an unsolicited basis, at no charge to them so long the adviser maintains a minimum</p>	

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Continuation Sheet for Form ADV Part II

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Euro Pacific Capital, Inc.		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 13 (cont.)	<p>amount of its clients' assets in accounts with the Custodial Broker. Some of the services provided by Custodial Broker also include brokerage, custody, research, and access to certain mutual funds and other investments that may not otherwise be available to non-institutional investors or would require a significantly higher minimum initial investment. Generally, the Custodial Broker does not charge separately for custody, or provides a discount on custodial services, because it is compensated by account holders through commissions or other transaction-related fees for security trades that are executed through the Custodial Broker. The Custodial Broker may also make available to the Adviser other products and services that benefit the Adviser but may not benefit its clients' accounts. Some of these other products and services may assist the Adviser in managing and administering clients' accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitation of trade execution (and allocation of aggregated trade orders for multiple client accounts), providing research pricing information and other market data and assisting with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of the Adviser's accounts, including accounts not maintained at the Custodial Broker providing the services. The Custodial Broker may also make available to the Adviser other services intended to help the Adviser manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the Custodial Broker may make available, arrange and/or pay for these types of services rendered to the Adviser by other independent third parties. While as a fiduciary, the Adviser endeavors to act in its clients' best interests, the Adviser's requirement that its clients maintain their assets in accounts at the Custodial Broker may be based in part on the benefit to the Adviser of the availability of some of the foregoing products and services.</p> <p>In addition, due to the fact that the Adviser does not directly pay for these services, including any research received, it may be construed as receipt of an economic benefit by the Adviser and therefore, a conflict of interest between the Adviser and the client.</p>	
Miscellaneous	<p><i>The purpose of FORM ADV is to help prospective and current Euro Pacific Capital clients understand more fully important information about working with Euro Pacific Capital. Current and prospective clients are encouraged to ask for clarification about any information contained in this document. Clients and prospective clients are encouraged to ask any question at any time. The information, such as phone numbers and email addresses, to contact Euro Pacific Capital can be found at www.europac.net</i></p>	

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Item of Form (identify)	Answer	
Privacy Policy Statement	<p>We, at Euro Pacific Capital recognize the importance of protecting the confidentiality of nonpublic personal information that we collect about our customers (for the purpose of this document, the term “our customers” refers to you). The information is used to ensure accuracy in reporting and record keeping, to maintain our customers’ accounts, and to carry out requested transactions. Keeping this information secure is a top priority for us, and we are pleased to share with you our privacy policy.</p> <p>1. We collect nonpublic personal information about our customers from the following sources:</p> <ul style="list-style-type: none"> ■ Applications or other forms (such as name, address, social security number, assets, and income). ■ Customers’ transactions with us, their financial organizations or others. ■ Consumer reporting agencies (such as credit worthiness and credit history). <p>2. Our internal data security policies restrict access to nonpublic personal information to authorized employees. We maintain physical, electronic, and procedural safeguards that are designed to comply with federal standards to guard our customers’ nonpublic personal information. Employees who violate our data security policies are subject to disciplinary action, up to and including termination.</p> <p>3. We may disclose nonpublic personal information about our customers to our affiliates, such as banks, mortgage lenders, and securities broker-dealers, in order to provide our customers with access to product offerings and product upgrades, and in order for our affiliates to provide services to us, such as data processing and loan servicing. We may disclose to our affiliates all of the information that we collect, as described above.</p> <p>4. We may disclose nonpublic personal information about our customers to nonaffiliated third-parties with whom we have contracted to perform services on our behalf, such as, printing, mailing, fraud prevention, and data processing services, as well as nonaffiliated financial organizations with which we have clearing agreements. We may disclose all of the information that we collect, as described above. We may also disclose nonpublic personal information about our customers as permitted or required by law.</p> <p>5. We do not disclose nonpublic personal information about former customers, except as permitted or required by law.</p> <p>6. If our customers visit the Euro Pacific Capital, Inc., internet web site, we may occasionally use a “cookie” in order to provide better service, to facilitate our customers’ use of the web site, to track usage of the web site, and to address security hazards. A cookie is a small piece of information that a web site stores on a personal</p>	

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Date:

August 26, 2009

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Euro Pacific Capital, Inc.

IRS Empl. Ident. No.:

Item of Form
(identify)

Answer

computer and which it can later retrieve. We may use cookies for some administrative purposes, for example, to store our customers' preferences for certain kinds of information. None will contain information that will enable anyone to contact our customers via telephone, e-mail, or any other means. If our customers are uncomfortable with the use of cookie technology, they can set their browsers to refuse cookies. Certain of our services, however, could be dependent on cookies and our customers may disable those services by refusing cookies.