

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

## OMB APPROVAL

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Name of Investment Adviser:

**Strategic Capital Allocation Group LLC**

Address: (Number and Street)

(City)

(State)

(Zip Code)

Area Code: Telephone Number:

**800 Boylston Street****Boston****MA****02199****( 617 ) 450-9300****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 governmental authority.****Table of Contents**

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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:

**Strategic Capital Allocation Group LLC**

SEC File Number:

**801-60513**

Date:

**03/30/2010****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 . . . . .  | <u>100</u> % |
| <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 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 |  |

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

**FORM ADV****Part II - Page 3**

Applicant:

**Strategic Capital Allocation Group LLC**

SEC File Number:

801- **60513**

Date:

**03/30/2009****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                        | 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   | J. Futures contracts on:   |
|   | <input checked="" type="checkbox"/> (1) tangibles                          |
| <input checked="" type="checkbox"/> C. Corporate debt securities<br>(other than commercial paper) | <input checked="" type="checkbox"/> (2) intangibles                        |
| <input type="checkbox"/> D. Commercial paper  | K. Interests in partnerships investing in:                                 |
| <input type="checkbox"/> E. Certificates of deposit   | <input checked="" type="checkbox"/> (1) real estate                        |
| <input checked="" type="checkbox"/> F. Municipal securities                                       | <input checked="" type="checkbox"/> (2) oil and gas interests              |
|   | <input checked="" type="checkbox"/> (3) other (explain on Schedule F)      |
| G. Investment company securities:   | <input type="checkbox"/> L. Other (explain on Schedule F)                  |
| <input type="checkbox"/> (1) variable life insurance  |  |
| <input type="checkbox"/> (2) variable annuities   |  |
| <input checked="" type="checkbox"/> (3) mutual fund shares  |  |

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

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

- |   |   |
|---|---|
| (1) <input type="checkbox"/> Charting               | (4) <input 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<br>Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input type="checkbox"/> Company press releases  |
| (4) <input checked="" 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<br>(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered<br>options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days)                 | (7) <input type="checkbox"/> Other (explain on Schedule F)  |
| (4) <input checked="" type="checkbox"/> Short sales  |   |

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

**FORM ADV****Part II - Page 4**

Applicant:

**Strategic Capital Allocation Group LLC**

SEC File Number:

**801-60513**

Date:

**03/30/2009****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.)

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

**FORM ADV****Part II - Page 5**

Applicant:

**Strategic Capital Allocation Group LLC**

SEC File Number:

801- **60513**

Date:

**03/30/2009****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.

**Response provided on Schedule F.**

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

**Response provided on Schedule F.**

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

Applicant:

Strategic Capital Allocation Group LLC

SEC File Number:

801-60513

Date:

03/30/2009

**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 unless applicant is registered or registering only with the Securities and Exchange Commission; 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  
☐ ☒

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Strategic Capital Allocation Group LLC</b>	<b>801- 60513</b>	<b>03/30/2010</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Strategic Capital Allocation Group LLC</b>		IRS Empl. Ident.No.: <b>04-3572754</b>
Item of Form (identify)	Answer	
1.D	<p>Strategic Capital Allocation Group LLC (SCA Group) will provide quarterly education and advice to institutions and high net worth individuals with respect to asset allocation strategy, the identification and selection of investment managers for specific asset categories, ongoing performance evaluation and portfolio monitoring services of the investment managers' performance. Clients will contract separately with each investment manager they decide to use. Fees charged by investment managers are not included in the fees charged by SCA Group. SCA Group will provide investment advice to its employees and family members at no charge.</p> <p>Information on disciplinary history and the registration of SCA Group and its associated persons may be obtained by contacting the Public Reference Branch of the U.S. Securities and Exchange Commission at (202) 942-8090 or the Massachusetts Securities Division, One Ashburton Place, 17<sup>th</sup> Floor, Boston, MA 02108.</p> <p>SCA Group will charge clients an annual Investment Strategy Services fee based upon the market value of Designated Accounts' assets. Invoices for such fees will be rendered quarterly in advance and will be based upon the value of the assets in the accounts as of the last business day of the previous calendar quarter, and including any additional cash or other assets committed by Client to SCA Group. The net asset value of such assets will be set forth on the report exhibit provided to Client by SCA Group and entitled "Market Value Breakdown and Asset Allocation Report." Fees for new accounts will be charged in advance, on a pro rata basis, at the inception of the account and quarterly in advance thereafter. For purposes of determining the value of assets under management, SCA Group may aggregate multiple accounts of an individual client.</p> <p>The fees paid to SCA Group do not include fees that may be charged by an investment manager, suggested by SCA Group and selected by a client at its sole discretion, to manage the client's assets. Client understands that, in addition to SCA Group's Investment Strategy Services fees, it may incur, and shall be responsible for, various other fees and expenses, including but not limited to, investment advisory fees charged by an investment manager, fees and expenses of investment companies in which Client selects, margin interest and such other commissions, fees, expenses and costs associated with securities transactions effected by or on behalf of Client's Designated Accounts.</p> <p>SCA Group reserves the right to modify the fee structure with written notice to the Client at least ninety (90) days prior to the effective date of such modification, provided however that no modification will be made during the initial one year term of the Client's agreement with SCA Group. Services other than those set forth in the Client's Letter of Engagement ("LOE") with SCA Group may require the payment of additional fees.</p> <p>Set forth below is SCA Group's Investment Strategy Services fee:</p> <p style="text-align: center;"><b>Annual Asset-Based Fee 50 Basis Points</b></p> <p style="text-align: center;"><b>Minimum Annual Fee \$500,000</b></p> <p>The annual fee may be negotiated (please also refer to Item 10 on this schedule). A Client's specific investment strategy services, including fees and terms of the agreement between SCA Group and the Client, will be set forth in the Client's Letter of Engagement ("LOE") and including applicable attachments or schedules.</p>	

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Strategic Capital Allocation Group LLC</b>	801- <b>60513</b>	<b>03/30/2010</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

**Strategic Capital Allocation Group LLC**

IRS Empl. Ident.No.:

**04-3572754**

Item of Form (identify)	Answer
1.D (cont.)	Either party may terminate the agreement with ninety (90) days prior written notice of intention to not renew the LOE to the other party. When the LOE is terminated, any unused fees that had been paid in advance by the Client will be pro-rated back to the Client in a timely manner. Upon termination of the LOE by either party, SCA Group will not be under any obligation to provide additional services or information to the Client. Termination of the agreement will not affect the liabilities or obligations of the parties under the LOE arising prior to termination.
3.K.3	SCA Group may offer education and advice on the selection of limited partnerships investing in private equity, venture capital, leveraged buyout, hedge fund and fund-of-funds investment vehicles. It is important to note that different types of investments involve varying degrees of risk, and there can be no assurance that any specific investment will either be suitable or profitable for a Client's portfolio. No client or prospective client should assume that any information presented in this document serves as the receipt of, or a substitute for, personalized individual advice from SCA Group.
4.A.5	Computer programs that create hypothetical portfolio allocations may be used in determining the suggested asset allocation for a client. Factors of qualitative and quantitative due diligence are considered in such hypothetical allocations and may include, but are not limited to: historical returns of various asset classes, tax-sensitivity of the client, expectations of return in a given asset class, the client's target return and likelihood achieving that return, the client's risk tolerance, as well as the client's downside exposure in the event of extreme market conditions.
4.B.8	Another source of information used is SCA Group's qualitative due diligence on investment funds. This research covers, but is not limited to: prime brokerage services for hedge funds; background checks on private equity fund principals and support professionals.
5.	As a general policy, SCA Group will expect its employees who provide investment advice to clients to be college graduates, preferably with a graduate school degree and business experience of at least three years in securities research analysis, consulting, brokerage or other fields complementing their present professional activities.
6.	<p>The following individuals are the current executive officers of the registrant, SCA Group:</p> <p><b>Name: Brian A. Hunter, CIMA</b>  Date of Birth: September 10, 1948  Education: Princeton University, B.S.E., 1970  SUNY Stony Brook, M.S., 1972</p> <p><i>Business Background:</i>  SCA Group, CEO/Managing Director – 9/2008 - Present  SCA Group, Managing Partner, CEO, CCO, &amp; CIO 1/2007 – 9/2008  SCA Group, CEO/Managing Director 10/2001 – 12/2006  Prudential Securities, Inc., Senior Vice President – Investments 7/1999 – 9/2001  Morgan Stanley Dean Witter, Senior Vice President – Investments 9/1995 – 6/1999  Lehman Brothers, Financial Advisor, 2<sup>nd</sup> Vice President 3/1985 – 8/1995</p> <p><b>Name: Ashish Kulkarni</b>  Date of Birth: May 22, 1978  Education: Massachusetts Institute of Technology (M.I.T.), M. Engineering, 2002: Penn</p>

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



**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Strategic Capital Allocation Group LLC</b>	801- 60513	03/30/2010

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Strategic Capital Allocation Group LLC</b>		IRS Empl. Ident.No.: <b>04-3572754</b>
Item of Form (identify)	Answer	
6. (cont.)	<p>State University, M.S., 2001; Indian Institute of Technology, B. Tech., 1999</p> <p><i>Business Background:</i>  SCA Group, Director – 9/2008 - Present  SCA Group, Co-Head of Global Investment Strategy, Managing Director – Risk Management, 1/2007 – 9/2008  SCA Group, Director – Financial Engineering, Senior Consulting Associate, 1/2003 – 12/2006  SCA Group, Technology Manager, Consulting Associate 8/2002 – 1/2003  SCA Group, Internship 6/2002 – 8/2002</p>	
7.A., 7.B. & 8.D.	<p>Pursuant to SEC Rule 204A-1, Strategic Capital Allocation Group LLC adopted a code of ethics effective February 1, 2005. This document outlines policy with regard to standards of business conduct, protection of material non-public information, personal securities reporting, pre-approval of certain transactions, and reporting violations of the codes. In addition, it incorporates full copies of SCA Group's statements of policies regarding the improper use of material non-public information, privacy, and conflicts of interest. All supervised persons must acknowledge in writing that they have received, and will adhere to, these codes of ethics. Should any of these be amended, all supervised persons must acknowledge (in writing) receipt of the amendments(s).</p> <p>Strategic Capital Allocation Group LLC will provide a copy of its code of ethics to any client or prospective client upon request.</p> <p>The stated minimum account size for institutional/high net worth individuals is \$100,000,000. However, at SCA Group's discretion, this minimum can be waived.</p> <p>SCA has developed a risk management/asset allocation/investment selection platform which it licenses for a fee based on funds under management. SCA has offered to license its platform to a number of investment managers to whom SCA directs client funds and expects that a number of such managers will license said platform from SCA beginning in 2010. This non-investment advisory business activity of SCA is no more demanding than that of a typical SCA client advisory relationship and will not detract from SCA investment advisory services to SCA advisory clients.</p>	
9.	<p>Reviews of portfolio performance and allocation are conducted quarterly. If the performance of an investment manager deviates sharply from that manager's stated performance goal for a period of more than one quarter, further review may be warranted. Also, changes in management, strategy or key personnel at an investment manager may trigger a review to determine whether the manager's goals remain compatible with a client's objectives. Additionally, a client's account may be reviewed if there is a change in a client's objectives or risk tolerance.</p> <p>For performance measurement and reporting, SCA Group provides quarterly investment performance reports for all clients of SCA Group. Instructions include: update client investment data monthly; investigate calculated performance discrepancies; and generate quarterly/interim reports as needed.</p>	
10.	<p>The Managing Director and Director have supervisory responsibility on all client account performance reporting, and at this time are directly responsible for all accounts, and are supported by the Senior Associate.</p>	

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Strategic Capital Allocation Group LLC</b>	<b>801- 60513</b>	<b>03/30/2010</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Strategic Capital Allocation Group LLC</b>		IRS Empl. Ident.No.: <b>04-3572754</b>
Item of Form (identify)	Answer	
11.A & 11.B	The responsibility for the presentation of quarterly reviews and other reports belongs to the Managing Director and the Director. The Managing Director remains the primary contact for all client relationships. Presentations typically occur quarterly at the convenience of SCA Group's individual and high net worth individual clients, and during trustee, board, or investment committee meetings scheduled by the corporate or other business entity.	
11.A & 11.B (cont.)	Reports to clients are generated quarterly. Reviews with clients will generally occur quarterly. The reports include: short and long-term time-weighted rates of return; comparison of a client's investment performance with applicable indices; quarter-end market values; and asset allocation compared to the client's target asset allocation for the various asset classes, as well as the portfolio's downside exposure in the event of extreme market conditions.	
12.B.	SCA Group has entered an agreement with Pershing Investment Manager Services, a BNY Securities Group Company ("Pershing"), to provide securities execution and clearing services for transactions and/or clearing that a client's investment manager directs to Pershing. Client's investment managers are under no obligation to use such services but are encouraged to consider doing so whenever it appears that Pershing can provide "best execution." In so doing, SCA Group will request that the investment managers it recommends to its clients consider using Pershing to provide execution, clearing and, in some cases, custodial services. However, Pershing's execution services will only be used if directed by the client or by the client's investment manager. While SCA Group will not have discretion to direct brokerage services with respect to a client's account, it is anticipated that a client's investment manager(s) will utilize the services of Pershing. Pursuant to the agreement with Pershing, SCA Group and Pershing have agreed to certain commission charges, costs and fees to be charged in connection with securities transactions effected through Pershing. It is anticipated that the investment managers recommended by SCA Group to its clients will enter a similar agreement with Pershing. SCA Group believes that Pershing will be able to effect client transactions so as to provide best price and execution. However, if a trade or trades were effected elsewhere, such transactions could be on terms more favorable to the client. Should a client or client's investment manager choose to direct brokerage to a broker-dealer other than one or more broker-dealers suggested by an investment manager, it is possible that certain benefits may not be available, for example lower execution and transaction costs that may have been negotiated by SCA Group and/or the investment manager.	

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