

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

OMB APPROVAL	
OMB Number:	3235-0049
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Name of Investment Adviser: Chronim Investments Inc. d/b/a Snider Advisors	
Address: (Number and Street) (City) (State) (Zip Code) 222 West Las Colinas Blvd., Suite 1050E Irving TX 75039	Area Code: Telephone Number: (214) 220-0055

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.

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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.

Applicant:

Chronim Investments Inc. d/b/a Snider Advisors

SEC File Number:

801- 64167

Date:

12/31/2009

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:

- ☒ (1) Provides investment supervisory services ----- 78 %
- ☐ (2) Manages investment advisory accounts not involving investment supervisory services ----- 0 %
- ☒ (3) Furnishes investment advice through consultations not included in either service described above ----- 10 %
- ☐ (4) Issues periodicals about securities by subscription ----- 0 %
- ☐ (5) Issues special reports about securities not included in any service described above ----- 0 %
- ☐ (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities ----- 0 %
- ☒ (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities ----- 1 %
- ☐ (8) Provides a timing service ----- 0 %
- ☒ (9) Furnishes advice about securities in any manner not described above ----- 11 %

(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)

- ☒ (1) A percentage of assets under management ☐ (4) Subscription fees
- ☒ (2) Hourly charges ☐ (5) Commissions
- ☒ (3) Fixed fees (not including subscription fees) ☐ (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)

- ☒ A. Individuals ☒ E. Trusts, estates, or charitable organizations
- ☐ B. Banks or thrift institutions ☒ F. Corporations or business entities other than those listed above
- ☐ C. Investment companies ☐ G. Other (describe on Schedule F)
- ☐ D. Pension and profit sharing plans

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

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

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 type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input 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 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
(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 checked="" type="checkbox"/> Trading (securities sold within 30 days) | (7) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

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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 checked="" 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 checked="" 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.)

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.

For those clients to whom Snider Advisors provides Consulting and Asset Management services, account reviews are conducted on an ongoing basis. These reviews are done by one of Snider Advisors' investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Snider Advisors and to keep us informed of any changes. Snider Advisors shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation or investment objectives.

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

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the client accounts. Those clients to whom Snider Advisors provides Asset Management services will also receive a report from us that may include relevant account and/or market-related information such as an inventory of account holdings and account performance on a monthly and quarterly basis.

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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:
Chronim Investments Inc. dba Snider Advisors	801-64167	12/31/2009

(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: Chronim Investments Inc. dba Snider Advisors	IRS Employer ID No.: 37-1429537
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Item of Form (identify)	Answer
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Item 1D

Advisory Services and Fees

Item D on section 1 of the Form ADV II asks for an explanation of description of services provided, basic fee information, and details of compensation provided by Chronim Investments Inc. dba Snider Advisors.

Snider Advisors is an investment advisory firm providing advisory services. Our advisory services include the following items; all based on the Snider Investment Method TM:

- Informational sessions, workshops and other educational programs and materials
- Investment consulting services on fee-only basis
- Investment management services on a fee-only basis

*Throughout this schedule F, "we", "us" or "our" refers to Snider Advisors and "you" or "your" refers to client or prospective client.

Item 1D, Section
1(A)9

Seminars, Workshops and Educational Programs and Materials

Snider Advisors conducts informational sessions and group educational workshops related to the Snider Investment Method TM. The information sessions provide concepts about cash flow investing and introduce the Snider Investment Method. We also offer an online version of the workshop. The Snider Method is a long-term strategy designed to create income from your portfolio. It uses a combination of stock, options and cash, along with specific techniques applied in a specific sequence, to achieve these goals. You will be asked to fill out a workshop participation agreement, a client profile and a suitability questionnaire prior to attending the workshop. This will help us understand your investment goals and determine if our method is a suitable investment for you.

You will receive the Snider Investment Method TM Owner's Manual. Investment objectives, risks and other information are contained in this manual; read and consider them carefully before investing. If you have questions about your specific situation, please make an appointment for a free consultation with one of our advisors. You will receive a detailed workbook so you can follow the method step-by-step. Upon completion of the workshop, you will have access to a client area of our website, newsletters, and other follow-up communications. You may also enter into separate services agreements with us for additional services such as consulting, data, and/or asset management services.

Snider Advisors offers half-day and one-day workshops covering many aspects of financial planning. The courses are described as KiM-B-A courses and cover Introduction to Investments, Retirement Planning, Funding Healthcare, Converting your IRA to a Roth, Investing for Retirement, and Estate Planning. The Investing for Retirement course covers essentially the same material as the two-day live Snider Investment Method course with regards to the Snider Investment Method.

Snider Advisor also offers an on-demand course about 401(k) investing. The course offers advice on how to properly manage many aspects of your 401(k) plan. You can watch the course as many times as you want. You also receive an Excel workbook with interactive tools and access to help by email or telephone.

Fees

The informational seminars are at no cost and are intended to provide concepts about cash flow investing and introduce the Snider Investment Method. There is a one-time fee for the workshop (\$2,475 for the live, two-day Snider Investment Method workshop and \$2,475 for the online version, and fees varying from \$247 to \$1,500 for the KiM-B-A courses). There is currently no separate charge for the on-demand 401(k) course. Some of our live workshops may be offered on a user-determined-fee basis. If you attend one of these workshops, you will decide how much you think the workshop is worth. Any discounts and/or promotional offers on any of our services are offered at our discretion. We may also reduce or waive fees for workshop attendance for family and friends of our employees or certain vendors and associates of Snider Advisors.

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:
Chronim Investments Inc. dba Snider Advisors	801-64167	12/31/2009

(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: Chronim Investments Inc. dba Snider Advisors	IRS Employer ID No.: 37-1429537
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Item of Form (identify)	Answer
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Item 1D, Section
1(A)3

Termination

We offer a money-back guarantee on our workshops. After you take the workshop, you have 90 days to decide if it's not for you. We will refund your money on request, no questions asked. The workshop agreement will automatically terminate 14 days after you attend the workshop unless you elect to extend it.

Investment-Related Consulting Services

Snider Advisors also provides investment-related consulting services. We charge either a fixed periodic fee or a percentage of assets fee for these services. Any discounts and/or promotional offers on any of our services are offered at our discretion. The consulting fee is generally paid at the beginning of each month. These services consist of access to our representatives for your investment related questions and reviewing investment decisions you have made or are planning to make.

Snider Advisors offers two levels of service for our consulting clients: General or Level 1 Consulting and Personalized or Level 2 Consulting. After you sign up for support, you can easily switch from one level to the other if you feel more or less support is needed. You may need higher levels of support in certain months (Personalized or Level 2) which may also involve placing trades for you (referred to as Vacation Trades). You must have an account at our recommended brokerage firm (optionsXpress) and sign a limited trading agreement in order for us to perform Vacation trades for you. These trades, both the actual investments and the timing in with which we perform them, will be entirely at our discretion. We may provide limited consultation services on investment and non-investment related matters. Snider Advisors may or may not receive additional compensation for these services.

Prior to hiring us for consulting services, you generally must enter into a written agreement with Snider Advisors setting forth the terms and conditions of the engagement and describing the scope of services. Neither Snider Advisors nor you may assign the agreement without the consent of the other party. Corporate transactions that do not result in a change of actual control or management of Snider Advisors shall not be considered an assignment.

In performing our services, we will not be required to verify any information received from you or from your other professionals (e.g., attorney, accountant, etc.) and we are expressly authorized to rely on such information. We may recommend our services and/or other professionals for implementation purposes. Please be advised that a conflict of interest exists if we recommend our own services. You are free at all times to accept or reject any recommendation from us, and you have the sole authority with regard to the acceptance or rejection of any recommendation or advice from us. Our recommendations are based upon our professional judgment. We do not guarantee the results of any of our recommendations. You remain solely responsible for implementation of any recommendation or other advice provided under the consulting agreement. Once we respond to your inquiry, we shall have no responsibility to update or revise our previous recommendations or advice. Moreover, please be advised it remains your responsibility to promptly notify us if there is ever any change in your financial situation or investment objectives for the purpose of reviewing, evaluating, or revising our previous recommendations and/or services, or if you wish to impose any reasonable restrictions upon our management services.

We may ask that you establish a custodial account with a designated broker/dealer(s), including optionsXpress, Inc. (optionsXpress). However, assets may be held at any qualified broker selected by you. Clients who sign up for our consulting services can use any broker they choose, But for us to have access to their accounts for training purposes as well as providing Vacation Trades, the account must be at optionsXpress. Snider Advisors has an economic incentive for recommending that Consulting clients open an account at optionsXpress. As further discussed under item 12 below, as part of a loan agreement with optionsXpress, Snider Advisors receives payment in the form of a loan reduction for each new account it refers to optionsXpress and any of its affiliates. However, the loan agreement does not limit clients of Snider Advisors to open accounts only at optionsXpress or its affiliates.

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:
Chronim Investments Inc. dba Snider Advisors	801-64167	12/31/2009

(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: Chronim Investments Inc. dba Snider Advisors	IRS Employer ID No.: 37-1429537
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Item of Form (identify)	Answer
Item 1D, Section 1(A)1	<p>As further discussed in Item 12A below, Snider Advisors does not have the authority to determine the broker or dealer our clients use or the commission rates they will pay. Under Item 12B below we do state that we recommend broker(s) to our clients. Because we make these referral recommendations to clients, we have a fiduciary duty to our clients to periodically evaluate the broker/dealer's overall performance.</p> <p>Data Services</p> <p>Snider Advisors offers Lattco, an online software tool that automatically uses the criteria defined by the Snider Investment Method TM to filter, analyze and identify the stocks that best match your account's needs. Lattco is an optional tool available exclusively to our clients. Lattco is offered to our asset management clients at no additional cost. Also, Lattco is available to our Consulting clients for \$30 each month the service is used. Clients will not be charged in the months they do not use Lattco. This cost is in addition to the monthly consulting fee.</p> <p>Fees</p> <p>Snider Advisors offers two levels of service for our consulting clients: Level 1 Consulting at \$10 per month or Level 2 Consulting where the fee is based on a percentage of assets invested in our method (see the table in the next section for the percentages), but not less than \$100 per month. We offer a limited number of months per year of Level 2 consulting at a flat \$100 per month fee. We may also charge an hourly fee for additional services, with rates varying from \$95 to \$300 per hour. Any discounts and/or promotional offers on any of our services are offered at our discretion.</p> <p>Termination</p> <p>Either party may terminate the consulting agreement by written notice to the other. If you terminate the agreement, we will not be required to provide you with any refund. However, if termination occurs within five business days of entering into the agreement, you will be entitled to a full refund.</p> <p>Investment Management Services and Fees</p> <p>We offer investment management services generally limited to the discretionary management of investment portfolios for individuals, trusts, estates, charitable organizations, and business entities. We invest client accounts using the Snider Method which involves various equity and government debt securities and option positions. We also invest portions of accounts in broad-based exchange traded funds to achieve overall asset class diversification (Asset Class Allocation Services). We refer to these services as Asset Management Services.</p> <p>We recommend all our prospective asset management clients attend the Snider Investment Method TM workshop. Attending the workshop helps our clients better understand the Snider Method. Snider Advisors offers a rebate against asset management fees for clients who attend the workshop. See the fee section below for more details on the rebate. Clients are not required to attend the workshop. All clients must fill out a client profile and suitability questionnaire. This will help us understand the clients' investment goals and determine if the Snider Method is a suitable investment.</p> <p>We strive to maintain your account data as accurately as possible; however, we rely on the reporting provided to us by your custodian through electronic or other means. We are not responsible for inaccurate data provided by the custodian. You must complete an Asset Management Services Agreement with Snider Advisors. This sets forth the terms and conditions for our services.</p> <p>All asset management clients must open an account at brokersXpress, an affiliate of optionsXpress, and sign a limited trading authorization. Snider Advisors has an economic incentive for requiring that Asset Management clients open an account at brokersXpress. As part of a loan agreement with optionsXpress, an affiliate of brokersXpress, Snider Advisors receives payment in the form of a loan reduction for each new account it refers to optionsXpress and/or brokersXpress. The loan agreement does not limit clients of Snider Advisors to open accounts only at optionsXpress or brokersXpress. Rather, the limitation arises from Snider Advisors' desire to trade client accounts through one broker-dealer/custodian. Snider Advisors does not have the technological and operational infrastructure to</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:
Chronim Investments Inc. dba Snider Advisors	801-64167	12/31/2009

(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: Chronim Investments Inc. dba Snider Advisors	IRS Employer ID No.: 37-1429537
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Item of Form (identify)	Answer
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	<p>accommodate Asset Management client trading through other broker-dealers and custodians.</p> <p>If you authorize the use of margin, and margin is subsequently used by us in the management of the your investment portfolio, the market value of your account and corresponding fee payable by yourself to Snider Advisors will not be increased. The fee is based on the total market value of your account including any reduction for an outstanding margin loan balance.</p> <p>Fees</p> <p>We charge an advisory fee for asset management services. The fee schedule for assets invested in the Snider Method is as follows:</p> <p style="text-align: center;">Less than \$500,000 : 2.50% \$500,000 - \$2,000,000 : 2.00% \$2,000,000 - \$5,000,000 : 1.50% More than \$5,000,000 : 1.00%</p> <p>Lower fees for comparable services may be available from other sources.</p> <p>Advisory fees are billed monthly, in arrears, for Snider Method accounts. The fees are based upon the market asset value at a predetermined date during the month or the day services are terminated (and prorated based on the number of days from the prior options expiration day). Fees are collected on the last day of the month, except for some grandfathered accounts which have fees collected quarterly. The fee for each month for all the accounts owned by one individual or one trust is subject to a maximum, which is the fee for the smallest asset value for the next level. For example, accounts under \$500,000 will pay 1/12 of 2.5%, but not more than 1/12 or 2.0% of \$500,000. Accounts for one person (or married couple and/or minor children) are aggregated to determine the fee.</p> <p>The fee schedule for assets invested in Asset Class Allocation is as follows:</p> <p style="text-align: center;">Under \$200,000 : \$500 \$200,000 - \$1,000,000 : 0.25% More than \$1,000,000 : \$2,500</p> <p>Lower fees for comparable services may be available from other sources.</p> <p>Advisory fees are billed quarterly for Asset Class Allocation accounts. The fees are based upon the market asset value at the close of the prior calendar quarter (or the day services commence). Fees are collected on the first day of the second month of the quarter (or the day services commence) and prorated based on the number of days in the quarter.</p> <p>The limited trading authorization agreement may allow the broker-dealer to debit advisory fees from the client's account. The broker-dealer must send to the client a statement, at least quarterly, identifying the amount of funds and each security in the account at the end of the period and set forth all transactions, including the deduction of advisory fees, in the account during that period.</p> <p>Our clients will incur brokerage commissions and/or transaction fees from the broker for certain securities transactions. In addition to our investment management fee, you may incur certain charges imposed by third parties such as custodial fees, brokerage commissions, transaction fees, charges imposed directly by a mutual fund or exchange traded fund disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Snider Advisors may, at its sole discretion, choose to refund certain transaction fees from third parties to certain clients.</p> <p>As further discussed in Item 10 (below), we generally impose an account minimum of \$200,000 for our</p>
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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:
Chronim Investments Inc. dba Snider Advisors	801-64167	12/31/2009

(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: Chronim Investments Inc. dba Snider Advisors	IRS Employer ID No.: 37-1429537
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Item 1D, Section 1(A)1	<p>Snider Method asset management services. The account minimum for Asset Class Allocation accounts is \$50,000. At our sole discretion, we may waive the stated account minimum.</p> <p>Snider Advisors offers a rebate against asset management fees for clients who take a Snider Investment Method™ workshop. You must sign on with Snider Advisors within one year of taking the workshop and invest at least \$200,000. The fee credit is 75% of your Snider Method workshop tuition. We deduct \$200 from your monthly fee until we reach the 75% level. After September 1, 2009, the 75% waiver only applies to the online version of the course. We may, in our sole discretion, apply a waiver to fees paid for live workshops where the Snider Investment Method is taught.</p> <p>We may waive or reduce asset management fees for family members of our employees.</p> <p><u>Termination</u></p> <p>We may terminate our investment advisory agreement with you at any time by providing you with written notice. Likewise, you may terminate the advisory agreement at any time by providing us with written notice. If the investment agreement is terminated within five (5) business days from the date of inception, all fees paid in advance will be refunded to you promptly. Should the investment advisory agreement be terminated at any other time, our investment management fee will be prorated through the date of termination and any remaining balance shall be charged or refunded to you, as appropriate, within ninety (90) days.</p> <p>Upon termination of our investment management services, we will have no obligation or authority to recommend or take any action with regard to the previously managed assets. You will bear the sole responsibility for proper liquidation and/or management of your assets after termination. We may decide to assist you with liquidating securities at our sole discretion.</p> <p><u>Privacy Policy</u></p> <p>We recognize and respect the privacy of each of our customers and their expectations for confidentiality. The protection of customer information is of fundamental importance in our operations and we take seriously our responsibility to protect nonpublic person information.</p> <p>A copy of our privacy policy notice and a written disclosure statement which meets the requirements of Rule 204-3 of the Adviser's Act of 1940, as amended, will be provided to each client prior to or at the same time as the execution of the services agreement. If you have not received a copy of our written disclosure statement at least 48 hours prior to executing the agreement you will have 5 business days after executing the agreement to terminate our services without penalty.</p> <p><u>Proxy and Class Action Policy</u></p> <p>We do not receive proxies or class action notices for securities held in your accounts. It is our policy not to vote, nor to give any advice how to vote any proxies issues held in your accounts. In addition, Snider Advisors will not take any action or make any decision with respect to class actions on securities held by clients. All common stocks owned by you are registered in your name. All proxy statements and class action notices are sent directly to you, you decide how to vote each proxy and what action to take on each class action.</p> <p><u>Financial Planning Services</u></p> <p>We offer financial planning services. They are offered as either seminars or individual sessions. The seminars cover areas such as investments, retirement planning, insurance needs, and estate planning. These services may be offered on a fixed fee basis or on a pay-what-you-want basis. We may also offer discounts or other incentives. You will receive an invoice at the time of registration detailing the exact fees for your situation. Individual sessions may be offered at an hourly rate, with rates varying from \$95 to \$300 per hour depending on the services. We may also sell insurance products and receive a commission for doing so.</p> <p>These services are described as Event Services in our client agreement. There is a ninety day refund policy applicable to all event services. Our service agreement will terminate without notice fourteen</p>

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	<p>days after a client accesses Event Services, assuming no other services are purchased under the agreement. Individual sessions are offered under event services, refund policy, termination policy. If you purchase an insurance policy through us, the refund and termination terms will be set by the insurance policy.</p> <p>Kim Snider may also appear as a paid speaker at events offering advice on general financial matters and may sell books or other materials offering general financial advice (not specific to any one person's situation).</p>																																					
Item 3L	<p><u>Types of Investments</u></p> <p><i>Section 3 of the ADV II offers explanation of types of investment services Snider Advisor offers to its clients.</i></p> <p>We offer advice on the following investments: exchange-listed securities, United States government securities, option contracts on securities. Item 3L indicates that we may also provide advice about any type of investment held in a client's portfolio at the beginning of the advisory relationship.</p> <p>We will not manage any investments for which a readily available market quotation does not exist.</p>																																					
Items 4A(5), 4B(8) and 4C(7)	<p><u>Methods of Analysis, Sources of Information, and Investment Strategies</u></p> <p><i>Section 4 deals with methods of analysis, sources of information, and investment strategies.</i></p> <p>Snider Advisors security analysis methods include: fundamental, technical and other proprietary investment strategies. The main source of information used for performing our securities analysis includes proprietary investment strategies through Lattco. Lattco is a new position generator developed exclusively for the Snider Investment Method™. Lattco automatically applies the Snider Investment Method™ stock-selection process to all available stocks and options, and generates the list of new positions. Lattco is an optional tool available exclusively to our clients. The investment strategies used to implement any investment advice given to clients includes: long term purchases, short term purchases, trading, margin transactions, option writing and Snider Investment Method™ strategies.</p>																																					
Item 5	<p><u>Education and Business Standards</u></p> <p><i>Section 5 of ADV II renders information on education and business standards of Snider Advisors.</i></p> <p>All individuals who render investment advisory services on behalf of the Snider Advisors must have investment-related experience. In addition, all such individuals shall have attained the Series 65 license, or the equivalent thereof, and may have obtained additional licenses.</p>																																					
Item 6	<p><u>Education and Business Background</u></p> <p><i>In section 6 we disclose personal information for each individual who determines general investment advice given to clients, each principal executive and each person with similar status or functions:</i></p> <table border="0"> <tr> <td colspan="2"><u>Kimberly A. Snider</u></td> <td>Born 1963</td> </tr> <tr> <td colspan="3">University of Colorado - 1988, B.S.</td> </tr> <tr> <td colspan="3">Recent Business Background:</td> </tr> <tr> <td>Chronim Investments, Inc.</td> <td>President</td> <td>2008 - present</td> </tr> <tr> <td></td> <td>Secretary/Treasurer</td> <td>2002 - 05</td> </tr> <tr> <td>Pecunia Investments, Inc.</td> <td>President</td> <td>2004 - 08</td> </tr> <tr> <td></td> <td>Secretary</td> <td>2002 - 05</td> </tr> <tr> <td></td> <td>Treasurer</td> <td>2002 - 08</td> </tr> <tr> <td colspan="3"> <u>James A. Hughes</u></td> </tr> <tr> <td colspan="2"></td> <td>Born 1962</td> </tr> <tr> <td colspan="3">University of Illinois - 1985, M.S.; Drake University - 1984, B.A.</td> </tr> <tr> <td colspan="3">Recent Business Background:</td> </tr> </table>		<u>Kimberly A. Snider</u>		Born 1963	University of Colorado - 1988, B.S.			Recent Business Background:			Chronim Investments, Inc.	President	2008 - present		Secretary/Treasurer	2002 - 05	Pecunia Investments, Inc.	President	2004 - 08		Secretary	2002 - 05		Treasurer	2002 - 08	 <u>James A. Hughes</u>					Born 1962	University of Illinois - 1985, M.S.; Drake University - 1984, B.A.			Recent Business Background:		
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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Chronim Investments Inc. dba Snider Advisors		IRS Employer ID No.: 37-1429537	
Item of Form (identify)	Answer		
	Chronim Investments, Inc.	President Chief Financial Officer Secretary Treasurer	2004 - 07 2005 - present 2006 - present 2008 - present
	Pecunia Investments, Inc.	Vice President Chief Financial Officer Secretary	2004 - 05 2005 - 08 2006 - 08
	<u>Shelley Jones Seagler</u> Texas Woman's University – 1992, B.S. Recent Business Background:		Born 1970
	Chronim Investments, Inc.	Trainer	2008 - present
	Pecunia Investments, Inc.	Trainer	2005 - 07
	<u>Jesse Gilbert Anderson - CFA</u> Robert Morris University – 2005, B.S.B.A. Recent Business Background:		Born 1983
	Chronim Investments, Inc.	Financial Advisor	2005 - present
	Legend Financial Advisors, Inc.	Intern	2003 - 05
	<u>John Thornton Cooley Jr</u> Wake Forest University – 2006, B.A. Recent Business Background:		Born 1983
	Chronim Investments, Inc.	Financial Advisor	2006 - present
	<u>Carli Klaeveman</u> Texas Christian University – 2007, B.A. Recent Business Background:		Born 1985
	Chronim Investments, Inc.	Financial Advisor	2007 – present
	Gresham Smith and Partners	Financial Analyst	2007 - 07
	<u>Tyler Vincent Curtis</u> Oklahoma State University – 2007, B.S. Recent Business Background:		Born 1985
	Chronim Investments, Inc.	Financial Advisor	2007 - present
	<u>Zachary Paul Penny</u> Texas State University – 2006, B.S. Recent Business Background:		Born 1983
	Chronim Investments, Inc.	Financial Advisor	2009 – present
	Eckard Investments	Account Manager	2009 – 2009
	Stanford Capital Management	Trader/Analyst	2006 – 2009
Item 7 & 8C(9)	<p>Kim Snider, the founder and president of Snider Advisors, has authored a book (<i>How to be the Family CFO</i>). This book covers general financial advice on issues such as saving money, wills, identity theft, etc. as well as general advice on investments. Snider Advisors sells copies of this book.</p> <p>Kim Snider also is available as a keynote speaker for events. She may speak on a variety of topics in this capacity, and Snider Advisors may charge a fee for her appearances.</p> <p>In addition, associated persons are also insurance agents of various insurance companies. In these capacities associated persons of the Adviser may recommend insurance products (i.e. long-term care and Medigap health insurance policies) and receive a normal transaction commission. Thus, a conflict of interest exists between the interests of associated persons and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of the associated persons or effect any transactions through the associated persons if they decide to follow the recommendations.</p>		

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Item 8C(1)	As further discussed under items 12 and 13A below, as part of a loan agreement with optionsXpress, Snider Advisors receives payment in the form of a loan reduction for each new account it refers to optionsXpress (a broker/dealer) and any of its affiliates. These payments are material to our advisory business.	
Item 9E	<p><u>Participation or Interest in Client Transactions</u></p> <p><i>Section 9 focuses on participation or interest in client transactions. Specifically, item 9 addresses the issue of Snider Advisor buying or selling for itself securities for that we also recommend to our clients.</i></p> <p>Snider Advisors generally does not buy or sell for itself securities it also recommends our clients. However, our employees may buy or sell securities identical to those recommended to our clients. It is our express policy that any person employed by us is prohibited from profiting at the expense of our clients and from competing with our clients. Our Code of Ethics covers the issues of participation and interest in client transactions.</p> <p><u>Code of Ethics</u></p> <p>Snider Advisors has adopted a code of ethics in compliance with Rule 204A-1 of the Investment Advisers Act of 1940. The Code establishes standards and procedures for the detection and prevention of activities by persons having knowledge of the investments and investment intentions of Snider Advisors, and to deal with other types of conflict of interest situations to which rule 204A-1 are addressed. In summary, the Code prohibits our employees from taking inappropriate advantage of their positions and the access to information concerning the investments and investment intentions of Snider Advisor for its clients, or their ability to influence such investment intentions, for personal gain or in a manner detrimental to the interests of its clients. Rule 204A-1 makes it unlawful for Snider Advisors employees to engage in conduct which is deceitful, fraudulent, or manipulative, or which involve false or misleading statements, in connection with the purchase or sale of securities. The Code acknowledges that Snider Advisors and/or its employees: (1) owe a fiduciary obligation to its clients; (2) have the duty at all times to place the interests of their clients first; (3) must conduct all personal securities transactions in such a manner as to avoid any actual or potential conflict of interest or abuse of an individual's position of trust and responsibility; (4) should not take inappropriate advantage of their positions in relation to client accounts; (5) must comply with the Federal Securities Laws; and (6) must safeguard nonpublic information.</p> <p>The Code is designed to ensure that the high ethical standards long maintained by Snider Advisors continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.</p> <p><u>Procedures and Disclosures</u></p> <p>The code of ethics and other procedures adopted by Snider Advisors contain the following provisions to handle conflicts of interest:</p> <ol style="list-style-type: none"> 1) We maintain records of all securities holdings for our clients, our self, our employees and anyone associated with our advisory practice. These holdings are reviewed on regular basis by our compliance personnel. 2) No individual shall cause or attempt to cause any of our clients to purchase, sell or hold any interest in a security in a manner calculated to create any personal benefit or benefit any employee account. No officer or employee of Snider Advisors shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment unless the information is also available to the investing public upon reasonable inquiry. 3) Each employee of Snider Advisors submits quarterly reports and acknowledges the firm's policies and procedures with respect to its code of ethics on annual basis. 	
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	<p>4) Each employee's personal trading accounts are reviewed on a regular basis by compliance personnel.</p> <p>5) Any employee not in observance of the above may be subject to disciplinary action, and possible termination.</p> <p>6) All employees trade their personal accounts the day after trade day, which is the day most of our clients' trades are placed. The black-out period for trading includes the trade day and the week before trade day, unless an exception is granted in writing for trades that would not adversely affect our clients.</p> <p>7) Clients are advised of a loan arrangement with optionsXpress (the broker/dealer we recommend to clients), which creates a material conflict between the clients' interest and Snider Advisors' interests. Consulting clients are not required to open an account with optionsXpress.</p> <p>Many of the securities we consider for our clients trade in sufficiently broad markets so that client transactions can be completed without any appreciable impact on the markets of such securities. Under certain limited circumstances, exceptions may be made to the policies stated above as long as we believe the exception will not adversely affect our clients. We will maintain records of these trades and/or exceptions, including the reasons for any exceptions.</p> <p>A copy of Snider Advisors Code of Ethics is available upon request. You may make this request in writing, by email, by telephone, or by fax. Current contact information can be found on our website at www.snideradvisors.com.</p>
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Item 10	<p><u>Conditions for Managing Accounts</u></p> <p><i>As discussed above (Item 1D on Schedule F), we provide investment management services.</i></p> <p>Snider Advisors generally has a minimum portfolio size of \$200,000 for starting and maintaining an asset management relationship (or \$50,000 for our Asset Class Allocation program).</p> <p>Snider Advisors, in its sole discretion, may accept clients with smaller portfolios based upon certain criteria including anticipated future earning capacity or additional assets, account composition, related accounts, and pre-existing clients. We will only accept clients with less than the minimum portfolio size if, in the sole opinion of the Snider Advisors, the smaller portfolio size will not cause a substantial increase of investment risk beyond the client's identified risk tolerance. We may aggregate the portfolios of immediate family members to meet the minimum portfolio size.</p>
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Items 12A and 12B	<p><u>Investment and Brokerage Discretion</u></p> <p><i>Section 12 of ADV II offers a dialogue on investment brokerage and brokerage discretion.</i></p> <p>Snider Advisors has the authority to determine securities being bought or sold and amount of securities being bought or sold without obtaining client consent. Snider Advisors does not have the authority to determine the broker/dealer to be used by our clients or commission rates paid by our clients without obtaining specific client consent. However, we do suggest broker(s) to our clients and we do require managed accounts be opened at our recommended broker/dealer(s).</p> <p>The factors we consider when recommending broker/dealer(s) to clients include financial strength, reputation, execution, pricing, research, and service. Commission rates for recommended broker(s) are generally considered discounted from customary retail rates, but may be higher or lower than those charged by other broker/dealer(s). We will only establish accounts with broker/dealer(s) that provide timely service and fair price. We chose to recommend a single broker because of the technology support we require, as well as, the necessity for us to be experts using the trading platform that the majority of our clients use.</p> <p>Our Asset Management clients must open an account at brokersXpress, an affiliate of optionsXpress. We do not have the technological and operational infrastructure to accommodate client trading through other broker-dealers. We recommend, but do not require, consulting clients to open an account at optionsXpress.</p>
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Snider Advisors has entered into a written agreement in which it has received cash and an economic benefit from a non-client in connection with giving advice to clients. More specifically, on January 31, 2008, Snider Advisors entered into a Loan and Security Agreement with optionsXpress. This agreement provides Snider Advisors with an initial loan and an option to obtain a second loan. Snider Advisors is required to pay the loan in full on or before the Maturity Date of December 31, 2011.

For each new account that Snider Advisors refers to optionsXpress or brokersXpress, Snider Advisors receives a credit which is applied against the loan. While the loan remains outstanding, the credit will be applied against the loan balance. After the loan is paid in full, optionsXpress may choose, in its sole discretion, to continue providing Snider Advisors with a credit to be paid in cash on a monthly basis.

We used the loan to subsidize various operational and business expenses, including the development of our existing business, which we would otherwise paid out of our own funds. The agreement with optionsXpress presents an economic incentive to us to recommend the trading and custodial services of optionsXpress. Clients should be aware that the indirect receipt of payments from optionsXpress creates a material conflict of interest between us and our clients.

As a fiduciary, Snider Advisors has an obligation to act in the best interest of its clients and to place its clients' interests before its own. Snider Advisors' receipt of the loan proceeds and credits from optionsXpress has created a situation whereby Snider Advisors is using its clients' accounts at optionsXpress to benefit itself financially because we receive a credit for each account you open with optionsXpress. Accordingly, Snider Advisors has compromised its ability to independently evaluate whether to recommend, or to keep, optionsXpress as the broker-dealer and custodian for its clients' assets. Snider Advisors does, however, have the responsibility as required by the Securities and Exchange Commission to regularly and frequently evaluate our recommendations of broker/dealers to ensure our clients are getting the Best Execution available.

Clients may contact Snider Advisors with any questions regarding its relationship with optionsXpress and the terms of the Agreement with optionsXpress.

Client transactions generally will be made independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine such orders to obtain best execution, better commission rates, or to allocate equitably among our clients differences in prices, commissions, or other transaction costs that might have been obtained if the orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among our clients pro rata to the purchase and sale orders placed for each client on any given day. The extent we aggregate client orders for the purchase or sale of securities are in accordance with the parameters set forth in SEC No-Action Letter, *SMC Capital, Inc.* We will not receive any additional compensation or remuneration as a result of the aggregation.

If a client asks us to arrange for the execution of transactions in their account, we shall direct such transactions through broker-dealers that we reasonably believe will provide "best execution."

Consulting clients may decide to use a particular broker-dealer to execute some or all of their transactions. In that case, the client will have the sole responsibility for negotiating commission rates and other transaction costs with the broker/dealer. If a client selects a specific broker, we will not be required to effect any transaction through the specified broker if we reasonably believe that to do so may result in a breach of fiduciary duties. We will not seek better execution services or prices from other broker-dealers or be able to batch client transactions for execution through other broker-dealers with orders for other accounts managed by Snider Advisors. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Trade Errors and Revisions

Snider Advisors has established a trade error review process. Snider Advisors primarily makes discretionary trades, but may in its sole discretion decide to revise a particular trade. We will consider the nature and cause of the error and whether the error resulted in a gain or a loss. We will offset any losses against gains resulting from the same error. Snider Advisors may reclassify trades that result in

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	<p>a loss as trades made in its own accounts, which would leave the client account unaffected by the revised trades. If this is not possible, we will notify clients of the errors caused by us that resulted in a loss and reach an agreement on how to resolve the errors as soon as practicable. We may decide to credit the clients' next advisory fee invoice for the amount of the loss, we may deposit funds equal to the amount of the loss to be deposited into the client's account, or under some circumstances a check may be sent directly to the client.</p>	
Item 13A	<p><u>Additional Compensation</u></p> <p><i>Item A of section 13 asks to disclose any arrangements, oral or in writing, where we are paid in cash or receive some economic benefit (including commissions, equipment, or non-research services) from a non-client in connection with giving advice to clients.</i></p> <p>As mentioned above, Snider Advisors is paid each time we refer a client and the client opens a new account with optionsXpress and any of its affiliates, including brokersXpress. The payment is a reduction of the balance of Snider's loan from optionsXpress. The loan agreement also allows Snider Advisors to request an additional loan. Snider Advisors' receipt of compensation from optionsXpress and its practice of recommending optionsXpress and brokersXpress create a conflict between its clients' interest in receiving best execution from broker-dealers and Snider Advisors' interest in receiving compensation to offset the balance of its loan from a particular broker-dealer and to receive an additional loan from that broker-dealer. These conflicts of interests compromise Snider Advisors' ability to provide unbiased recommendations as to which broker-dealers its clients should choose.</p> <p>Snider Advisors receives from optionsXpress, without cost, access to computer software and related systems support. This allows us to better monitor client accounts maintained at optionsXpress. We may also receive from optionsXpress, without cost, stock and option market data. This allows us to automate transactions with our recommended broker. These services are typically offered on similar terms by optionsXpress to all its affiliated advisors and retail clients.</p>	
Item 13B	<p>In general, our employees who refer or help solicit investment advisory clients for us may be compensated on the basis of a percentage of the advisory fees paid by such referred clients, a flat amount per client referred, or on the basis of a percentage of assets added to an asset management account. We presently do not offer any such incentive compensation programs to our employees other than an informal, company-wide bonus program. The payments under this program are at the sole discretion of the management of Snider Advisors.</p>	

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