

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

## OMB APPROVAL

OMB Number: 3235-0049  
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Name of Investment Adviser:

**Ralph Parks Investment Group. LLC**

Address: (Number and Street)

**101 Sully's Trail Building 10**

(City)

**Pittsford**

(State)

**NY**

(Zip Code)

**14534**

Area Code: Telephone Number:

**( 585 ) 248-5700**

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

Applicant:

Ralph Parks Investment Group LLC

SEC File Number:

801-65169

Date:

07/16/2010

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>50%</u> |
| <input checked="" type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services .....  | <u>40%</u> |
| <input type="checkbox"/>            | (3) | Furnishes investment advice through consultations not included in either service described above .....  | <u>%</u>   |
| <input type="checkbox"/>            | (4) | Issues periodicals about securities by subscription .....   | <u>%</u>   |
| <input type="checkbox"/>            | (5) | Issues special reports about securities not included in any service described above .....   | <u>%</u>   |
| <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 ..... | <u>%</u>   |
| <input checked="" type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities .....   | <u>10%</u> |
| <input type="checkbox"/>            | (8) | Provides a timing service .....   | <u>%</u>   |
| <input type="checkbox"/>            | (9) | Furnishes advice about securities in any manner not described above .....   | <u>%</u>   |

(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 type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input checked="" 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).

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Applicant:

**Ralph Parks Investment Group, LLC**

SEC File Number:

**801- 65169**

Date:

**07/16/2010****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 type="checkbox"/> (3) foreign issues                                | <input checked="" type="checkbox"/> (1) securities                         |
|  | <input checked="" type="checkbox"/> (2) commodities                        |
| <input type="checkbox"/> B. Warrants                                       | J. Futures contracts on:   |
| <input checked="" type="checkbox"/> C. Corporate debt securities           | <input type="checkbox"/> (1) tangibles                                     |
| (other than commercial paper)  | <input type="checkbox"/> (2) intangibles                                   |
| <input type="checkbox"/> D. Commercial paper                               | K. Interests in partnerships investing in:                                 |
| <input checked="" 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 type="checkbox"/> (3) other (explain on Schedule F)                 |
| G. Investment company securities:  | <input type="checkbox"/> L. Other (explain on Schedule F)                  |
| <input checked="" type="checkbox"/> (1) variable life insurance            |  |
| <input checked="" 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 checked="" type="checkbox"/> Charting  | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input type="checkbox"/> Fundamental          | (5) <input 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 type="checkbox"/> Inspections of corporate activities           | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input type="checkbox"/> Research materials prepared by others         | (7) <input type="checkbox"/> Company press releases   |
| (4) <input checked="" type="checkbox"/> Corporate rating services          | (8) 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 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:

**Ralph Parks Investment Group, LLC**

SEC File Number:

**801-65169**

Date:

**07/16/2010****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  
X ☐

(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).**

Applicant:

Ralph Parks Investment Group, LLC

SEC File Number:

801- 65169

Date:

07/16/2010

**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.

The Adviser reviews accounts for performance on a portfolio level monthly and reviews securities held in the portfolios weekly. Recommendations are documented and implemented by a principal of the firm. Performance information is not verified by a third party. It is calculated by Pershing on a uniform and consistent basis. Performance information is examined periodically by Mengel, Metzger & Barr & Co. LLP, the Adviser's accountant. Suitability reviews are offered to clients on a Bi- Annual basis; Investment performance reports, provided by Pershing, are reviewed by the principals of the firm upon receipt and with the client periodically upon request.

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

Pershing, as clearing agent, has custody of the assets and transmits trade confirmations to the client, Excel Securities, and the Adviser for all transactions executed, monthly statements for each month in which there is activity, and statements of securities held in custody at least quarterly to clients. Pershing also provides clients with investment performance reports."

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

**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>Ralph Parks Investment Group LLC</b>	<b>801- 65169</b>	<b>07/16/2010</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Ralph Parks Investment Group LLC</b>		IRS Empl. Ident.No.:
Item of Form (identify)	Answer	
<b>Item 1.D Advisory Services</b>	<p>Ralph Parks Investment Group, LLC ("the Adviser" or "Adviser") is responsible for supervising the rendering of any investment advice that may be provided by its personnel. Adviser manages all client accounts through fee based services:</p> <ul style="list-style-type: none"> <li>Financial planning and implementation</li> <li>Portfolio Management for the All-Cap Diversified Equity Growth Portfolio - A.K.A. 'Fusion' (Schedule H)</li> <li>Portfolio Management for the Managed Balanced Portfolio (Schedule H)</li> </ul> <p><b><u>Financial Planning and Implementation</u></b></p> <p>The Advisory client may participate in one or more of the Adviser advisory services. The scope of such services will be determined at the time such services are requested. Services are subject to the provisions of the respective agreements, including the provisions relating to separate payment of fees and the limitations of Adviser's duties and liabilities.</p> <p>Fees are automatically deducted from the Client's account on a quarterly basis, in advance.</p> <p>Typically, the client is charged a single quarterly fee which includes the Adviser advisory, clearing and custody fee as well as the cost of all transactions executed through Excel Securities. The Adviser uses the clearing and custody services of Pershing, a member of the New York Stock Exchange and SIPC, for safekeeping assets and Excel Securities for execution of securities transactions for its clients.</p> <p>Excel calculates the fee and directly debits the client account. Fees are automatically deducted from the Client's account on a quarterly basis, in advance. Fees are calculated as an annual percentage of assets based on the value of the account on the last day of the prior quarter. Fees are billed on a prorated basis from inception of the account for the remainder of the calendar quarter and quarterly in advance thereafter. Fees will be adjusted for significant contributions and withdrawals during the quarter. Clients who terminate during the quarter will receive a pro-rata reimbursement for pre-paid fees. Excel Securities collects fees and pays the Adviser its portion.</p> <p>The schedule below reflects fees charged by Excel Securities on behalf of the Adviser. Subsequent to Excel Securities deducting their own fees and other third party payments (which total approximately 45bp), Excel Securities remits the balance to the Adviser. For example if the fee is 1.50% the remaining 1.05% is paid to RPIG for advisory management services.</p> <p>The blended fee schedule for All-Cap Diversified Equity Growth Portfolio is:</p> <ul style="list-style-type: none"> <li>3.00% Fee for Managed Growth Portfolio Under \$500,000</li> <li>2.50% Fee for Managed Growth Portfolio From 500,000 To \$1 Million</li> <li>2.00% Fee for Managed Growth Portfolio Over \$1 Million</li> </ul> <p>The fee schedule for Managed Balanced Portfolio is:</p> <ul style="list-style-type: none"> <li>1.50% Flat Fee – No minimum</li> </ul> <p>Clients who elect to have all assets managed by the Adviser are charged:</p> <ul style="list-style-type: none"> <li>1.50% Flat Fee regardless of the product(s) chosen.</li> </ul> <p>There may be situations when a mutual fund or other vehicle will be used to fill a specific asset class. Mutual funds, or other vehicles that may be used in the clients account, may have charges and expenses that are imposed independent of the Adviser and may include investment management administrative and transaction expenses. Therefore, in cases where mutual funds or other vehicles are used, the client may be charged the underlying management fee for these mutual funds or other</p>	
<b>Item 2. Clients, Services &amp; Fees</b>		
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>Ralph Parks Investment Group LLC</b>	<b>801- 65169</b>	<b>07/16/2010</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Ralph Parks Investment Group LLC</b>		IRS Empl. Ident.No.:
Item of Form (identify)	Answer	
<b>Item 4. Method, Strategy</b>	<p>vehicles. These are explained fully in the prospectuses or other disclosure documents that the Adviser delivers to clients.</p> <p>Certain Adviser employees may also act as broker-dealer representatives through Excel Securities. Under the supervision of Excel Securities Ralph Parks Investment Group's registered brokers may execute non discretionary trades and receive commission based compensation through Excel Securities.</p> <p><b><u>All-Cap Diversified Equity Growth Portfolio - A.K.A. 'Fusion'</u></b> This strategy is designed for the investor who needs exposure to an all cap growth equity portfolio. The strategy involves a high turnover ratio which could lead to inefficient returns. The model fusion portfolio usually has a high beta performance and thus requires the investor to have a moderate to aggressive risk profile. Investors should have a minimum of 3-5 years of investment time horizon.</p> <p>The Fusion portfolio investment strategy focuses on the macro and micro analysis of U.S. financial markets. The Fusion portfolio is available only on a discretionary account basis. The investment process in this portfolio can be best described as a two step process.</p> <p><b><u>Step 1 : Macro Market Analysis</u></b> - In this step the adviser determines the macro direction of the equity markets in the United States. Only if the macro direction test is positive i.e. adviser believes the current market trend is moving upwards, the investment process moves to the next step. Otherwise all assets in the portfolio remain in money market funds until the above scenario is attained.</p> <p><b><u>Step 2 : Micro Market Analysis:</u></b> - Once it is determined that the overall market trend is positive, the adviser uses an advanced technical configuration to determine what would be the best possible investment opportunity available in the market at that given time. Such strategies are selected from a group of 3,000 - 4,000 pre selected U.S. equity securities. Careful consideration is made towards reaching the goals of adequate diversification, liquidity and volume.</p> <p>All investment decisions or judgments are made based on a 100% technical analysis strategy. At no point in time, personal judgment or fundamental views are employed. The technical strategies employed have been designed and back tested by the advisor and are proprietary.</p> <p><b>Investment Time Horizon : 3 - 5 Years</b> <b>Risk Profile : Moderate - Aggressive</b> <b>Tax Efficiency : Low</b></p> <p><b><u>Managed Balanced Portfolio</u></b></p> <p>This strategy is designed for the investor who has a long term objective in income and or growth. Client individual needs are analyzed. Each portfolio is custom designed to meet client individual investment objectives based on their financial profile. Investments are made on both discretionary or non-discretionary basis. Investments in this type of account include but are not limited to stocks, mutual funds, exchange traded funds, bonds, preferred stocks and certificate of deposits. The Adviser conducts periodic reviews to ensure goals of adequate diversification, liquidity and income are being achieved.</p> <p><b>Investment Time Horizon : Based on individual needs</b> <b>Risk Profile : Based on individual needs</b> <b>Tax Efficiency : Based on individual needs</b></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>Ralph Parks Investment Group LLC</b>	<b>801- 65169</b>	<b>07/16/2010</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Ralph Parks Investment Group LLC</b>		IRS Empl. Ident.No.:
Item of Form (identify)	Answer	
<b>Item 5 Education and Business Standards</b>	Investments for portfolios are determined by Portfolio Managers, who apply standards and practices established by the firm in analyzing and making investment decisions.	
<b>Item 6 Education and Business Background</b>	<p>The Adviser requires that employees have significant investment experience prior to providing services, other than clerical or administrative, to its investment advisory clients. Generally, this translates to at least 2 years experience in a related financial services business or equivalent education.</p> <p>Name: Ralph Parks Date of birth: 02/19/1938 Education: B.S. Michigan State University MBA – Finance - Michigan State University History: President &amp; C.E.O of Ralph Parks Investment Group &amp; an Investment Broker for Excel Securities 12/2005-present.</p> <p>35 years in financial services industry after a long career in banking. Sr. VP of Smith Barney for 13 years, previously with Merrill Lynch and Edward D. Jones. With special training on managing discretionary portfolios Ralph concentrates on managing a variety of investment portfolios for both pre- and post-retirement individual investors, businesses and corporations. Series 7, 63 and 65, Life Accident and Health Insurance licenses held.</p> <p>Name: Gina Griffo Date of Birth: 04/14/69 Education: University of Rochester History: Executive Vice President of Ralph Parks Investment Group, LLC &amp; an Investment Broker for Excel Securities 12/2005-present</p> <p>12 years in the financial services industry holding Series 7, 63, 65, Life Accident and Health Insurance licenses. Gina Griffo is the Executive Vice President and Portfolio Manager of Ralph Parks Investment Group, LLC. Prior to accepting this position, Gina Griffo was a Portfolio Management Associate at Smith Barney from 1998-November 2005. She was previously an Assistant Bursar for the University of Rochester.</p> <p>Name: Rajiv Dixit Date of Birth: 05/17/79 Education: BS in Finance and Information Systems Rochester Institute of Technology History: Chief Operating Officer of Ralph Parks Investment Group, LLC &amp; an Investment Broker for Excel Securities 12/2005-present</p> <p>Chief Operating Officer of Ralph Parks Investment Group LLC. 11/2005 – Present. Prior to joining Ralph Parks Investment Group, Rajiv was President and Director of Information Technology for Campus Ventures LLC. As a Director of Campus Ventures Rajiv developed and co-coordinated several Information Technology &amp; financial research projects. Series 7 &amp; 66 licenses held.</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>Ralph Parks Investment Group LLC</b>	<b>801- 65169</b>	<b>07/16/2010</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Ralph Parks Investment Group LLC</b>		IRS Empl. Ident.No.:
Item of Form (identify)	Answer	
<b>Item 8 D Other Financial Industry Activities or Affiliations</b>	Ralph Parks is the Chief Investment Officer of the Ralph Parks Investments Group and as such manages investment strategy for the All Cap Diversified Equity Portfolio (Fusion) and The Managed Balanced Portfolio.	
<b>Item 9 Participation or Interest in Client Transactions</b>	<p>Certain Adviser employees act as broker-dealer representatives through Excel Securities. Under the supervision of Excel Securities the Adviser registered brokers may execute non discretionary trades and receive commission based compensation through Excel Securities. (Any commission payments received are included in the calculation of the advisory fee for the client's account.)</p> <p>The Adviser's policy is to consider the clients interest before personal interests. Employees of the Adviser may execute transactions in their personal accounts in the same securities that are being executed in client accounts as long as there is not a perceived or potential conflict of interest. The Adviser has adopted a Code of Ethics and Personal Trading Policy in compliance with Investment Advisers Act rule 204A-1. The Adviser requires all associated persons to adhere to the highest ethical standards; placing client interest before personal interest. The Adviser requires access persons to report initial and annual holdings reports, quarterly transaction reports, and to pre-clear transactions in IPO's and private placements. In addition, the Adviser has outlined the sanctions for failing to comply with the Adviser's Policies and Procedures. The Code of Ethics is available upon request.</p>	
<b>Item 10: Conditions for Managing Accounts</b>	Generally, there is a minimum account size of \$500,000. However, the Adviser has the discretion to waive minimum balance requirements.	
<b>Item 11: Account Review and Reporting</b>	<p>A. The Adviser reviews accounts for performance on a portfolio level monthly and reviews securities held in the portfolios weekly. Recommendations are documented and implemented by a principal of the firm. Performance information is not verified by a third party. It is calculated by Pershing on a uniform and consistent basis. Performance information is examined periodically by Mengel, Metzger &amp; Barr &amp; Co. LLP, the Adviser's accountant. Suitability reviews are offered to clients on a Bi- Annual basis; Investment performance reports, provided by Pershing, are reviewed by the principals of the firm upon receipt and with the client periodically upon request.</p> <p>B. Pershing, as clearing agent, has custody of the assets and transmits trade confirmations to the client, Excel Securities, and the Adviser for all transactions executed, monthly statements for each month in which there is activity, and statements of securities held in custody at least quarterly to clients. Pershing also provides clients with investment performance reports."</p> <p>The Adviser has full discretion over trading in client 'Fusion' accounts. Under the supervision of Excel Securities the Adviser's registered brokers may execute non-discretionary trades and receive commission based compensation through Excel Securities for brokerage accounts.</p> <p><b>Best Execution</b></p> <p>The Adviser manages client portfolios on a discretionary &amp; non-discretionary basis and has a fiduciary responsibility when executing transactions for clients. The Adviser executes securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances.</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>Ralph Parks Investment Group LLC</b>	<b>801- 65169</b>	<b>07/16/2010</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Ralph Parks Investment Group LLC</b>		IRS Empl. Ident.No.:
Item of Form (identify)	Answer	
<b>Item12: Brokerage Discretion</b>	<p>The Adviser has an obligation to obtain the “best execution” for its client(s) transactions. “Best execution” is defined as the most favorable, quality execution possible while considering the broker’s services, commissions charged, volume discounts offered, execution capability, reliability and responsiveness of the broker/dealer.</p> <p>The CCO or designee periodically tests and documents the execution quality for accounts over which the Adviser has brokerage discretion. The Adviser executes all trades through Excel Securities.</p> <p><b>Select Broker</b></p> <p>The Adviser’s clients will generally use Excel Securities. The Adviser strongly recommends this because they are the broker dealer through which the Adviser executes transactions, allocating positions on an average price and performance reporting are all consistent for its clients. Clients choosing this broker dealer will typically instruct the firm to direct portfolio transactions through Excel at a rate agreed to between the parties, or as set forth in a wrap fee arrangement.</p> <p>Clients are free to choose or change broker dealers, provided that the chosen broker dealer can provide adequate services as determined by the Adviser. In the event such brokerage cannot provide such services, to be determined by Adviser, Adviser may be unable to accept management of the portfolio. A client choosing another broker dealer to direct brokerage transactions is responsible for negotiating fees or commissions with that broker dealer, unless Adviser has a wrap fee arrangement with such broker dealer. The client is responsible to independently determine whether the commissions charged or execution effected is done at rates or prices that are better than could be obtained had Adviser directed the trade. In such circumstances, the client will receive trade confirmations directly from the designated broker (or its clearing firm) and pay brokerage commissions in accordance with the designated broker’s schedule of rates or whatever arrangement the client has negotiated.</p> <p><b>Allocation</b></p> <p>The Adviser allocates trades fairly and does not favor certain performance-based or other client accounts with "hot issues". The adviser will not aggregate transactions unless aggregation is consistent with its duty to seek best execution and the terms of the investment advisory agreement with each client for which trades are being aggregated. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all adviser’s transactions in that security on a given business day, with transaction costs shared pro-rata based on each client’s participation in the transaction. In addition, the Adviser prohibits allocating profitable trades at each day's end, disproportionately favoring certain clients. The Adviser does not manage a proprietary account in a favorable manner over client accounts.</p> <p>The Adviser supervises the allocation of transaction costs and securities among clients’ accounts. The designated CCO reviews to ensure that the Adviser is not unfairly favoring any client accounts.</p> <p>For blocked trades with partial fills, the Adviser will allocate trades on a rotational basis.</p> <p><b>Cross Trading, Principal Trading, Soft Dollars</b></p> <p>Adviser does not engage in cross trading, principal trading or in accepting soft dollar arrangements.</p>	

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**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Ralph Parks Investment Group LLC</b>	<b>801- 65169</b>	<b>07/16/2010</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Ralph Parks Investment Group LLC</b>		IRS Empl. Ident.No.:
Item of Form (identify)	Answer	
<b>Item 13B-Client Referrals</b>	<p>The Adviser may enter into arrangements from time to time and with clients whereby the Adviser agrees to reduce client fees when clients refer other clients to the Adviser. The advisory fee charged to the client is not affected by the use of a third party in connection with the client's account(s), and the client will not be assessed any additional fees for the use of such services by the Adviser. If the services of a third party are used in connection with the client's account, the structure of the arrangement and the compensation paid to the third party will be fully disclosed to the client pursuant to Rule 206(4) of the Investment Advisers Act of 1940 and all subsequent amendments thereto.</p>	
	<p><b>Proxy Voting</b></p> <p>The Adviser's exercises proxy votes on behalf of its discretionary clients. The Adviser's voting history is available on request. As a matter of policy, the Adviser monitors corporate actions, receives and votes client proxies and discloses any potential conflicts of interest, voting proxies for portfolio securities consistent with the best economic interests of its clients.</p>	
	<p><b>Privacy Policy</b></p> <p>The adviser maintains high standards to safeguard nonpublic personal information at all times. The firm restricts access to personal information to those employees who need that information to provide you with our products and services. The Adviser maintains physical, electronic and procedural safeguards to insure the security of personal information.</p> <p>The Adviser does not disclose any nonpublic personal information about its current or former clients to anyone, except as permitted by law, and for the purpose of serving its clients' financial needs. The Adviser may, as necessary, disclose nonpublic personal information to certain third parties, such as brokers, to execute trades or to otherwise support your account(s) with us. Information may be disclosed to government agencies and regulatory organizations when required by law.</p>	
	<p><b>Client Referrals</b></p> <p>The Adviser offers all our clients the opportunity to receive a fee discount credit for client referrals if the credit is mutually agreed among the parties.</p>	

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