

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Walden Capital Advisors, LLC	801- 142292	03/25/2010

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Walden Capital Advisors, LLC</b>		IRS Empl. Ident.No.:								
Item of Form (identify)	Answer									
Item 1.D.	<p><b>Advisory Services and Fees</b></p> <p>Walden Capital Advisors, LLC ("Walden") is a limited liability company formed under the laws of the Commonwealth of Pennsylvania. This Schedule F narrative provides clients and prospective clients with information regarding Walden and its qualifications, business practices, and nature of advisory services. The information in this Schedule F has not been approved or verified by the Pennsylvania Securities Commission or the United States Securities and Exchange Commission.</p> <p>Please contact Jill Broder Steinberg, Managing Member, if you have any questions about this Schedule F narrative. Additional information about Walden is available on the Internet at <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Walden is 142292.</p> <p>Walden provides discretionary investment advice to high net worth individuals, trusts, retirement plans, foundations and nonprofit organizations. Walden provides discretionary portfolio management services where the investment advice provided is tailored to meet the individualized needs and investment objectives of the client. Accordingly, Walden is authorized to determine the securities to be purchased or sold and the amount of securities to be purchased or sold. Once the portfolio is constructed, Walden provides supervision and rebalancing of the portfolio as changes in market conditions and client circumstances may require.</p> <p>Walden's standard fee schedule is as follows:</p> <table border="0"> <tr> <td></td> <td style="text-align: right;">Annual Fee</td> </tr> <tr> <td>First \$1,000,000</td> <td style="text-align: right;">1.00%</td> </tr> <tr> <td>Next \$4,000,000</td> <td style="text-align: right;">0.75%</td> </tr> <tr> <td>Assets over \$5,000,000</td> <td style="text-align: right;">0.50%</td> </tr> </table> <p>Walden's investment advisory fees are payable quarterly in advance. The fee is based on a percentage of the market value of assets under management on the last business day of the previous quarter. Walden requires an approximate minimum account size of \$1,000,000 and charges a minimum quarterly fee of \$2,500. Depending on certain client specific factors, Walden may reduce its minimum annual fee, account size, or fee schedule.</p> <p>Walden primarily advises with respect to investments in a diversified portfolio of mutual funds. Clients will bear a proportionate share of the operating expenses of such mutual funds in addition to Walden's fees. Clients will bear any transaction costs charged by the custodian/brokerage firm, if any. Walden works exclusively on a percentage of assets under management basis and does not receive commissions from any source.</p> <p>When a client directs Walden to use one or more specific brokers for the execution of transactions, clients are advised that Walden has a fiduciary responsibility to obtain best execution for trades and that the client may receive more costly execution than Walden could negotiate or obtain if it were allowed to exercise discretion in the selection of the executing firm.</p>			Annual Fee	First \$1,000,000	1.00%	Next \$4,000,000	0.75%	Assets over \$5,000,000	0.50%
	Annual Fee									
First \$1,000,000	1.00%									
Next \$4,000,000	0.75%									
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Item 1.D. (continued)	<p>Walden will either invoice the client directly or payment of fees will be made by the custodian holding the client's funds and securities provided the following requirements are met. The client will provide written authorization permitting the fees to be paid directly from the client's account held by the qualified custodian. Walden will not have access to client funds for payment of fees without client consent in writing. Further, the qualified custodian agrees to deliver an account statement at least quarterly directly to the client. The client is encouraged to review the client's account statements for accuracy. Walden will receive a duplicate copy of the statement that was delivered to the client by the custodian.</p>	
Item 3.L.	<p>Walden or the client may terminate the management agreement within five days of the date of acceptance without penalty to the client. After the five-day period, either party, upon 30 days written notice to the other, may terminate the management agreement. The management fee will be pro-rated for the quarter in which the cancellation notice was given and any unearned fees will be returned to the client.</p> <p><b>Types of Investments</b></p> <p>Walden reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. Walden may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.</p>	
Items 4.A.(5), 4.B.(8), 4.C.(7)	<p><b>Methods of Analysis, Sources of Information, and Investment Strategies. Other:</b></p> <p>Walden works closely with clients to determine their investment goals and levels of risk tolerance. The firm's basic investment philosophy is rooted in the belief that long term returns are determined primarily by asset allocation as opposed to stock picking and market timing. For each client, Walden constructs a portfolio of mutual funds diversified across multiple market sectors designed to meet that client's investment objectives and level of risk tolerance. Walden offers a variety of investment strategies ranging from conservative to aggressive.</p>	
Item 5	<p><b>Education and Business Standards</b></p> <p>Associated persons of Walden who are involved in determining or giving investment advice to clients must meet all examination or experience requirements of the state(s) and/or jurisdiction(s) in which the individual provides advisory services. In addition, Walden requires persons involved in the investment process and providing investment advice to clients to have a college degree.</p>	

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Item 6.	<p><b>Education and Business Background</b></p> <p><b>Jill Broder Steinberg</b>  <i>Year of Birth:</i> 1963</p> <ul style="list-style-type: none"> <li>▪ Princeton University, B.A., Economics, 1985, cum laude.</li> <li>▪ The Wharton School of the University of Pennsylvania, M.B.A., 1989, with distinction</li> </ul> <p>Walden Capital Advisors, LLC 2006-present  Prudent Management Associates 2000-2006  Sherman Financial, Inc. 1994-2000  Legg Mason, Inc. 1992-1994  The Middle Market Group 1989-1992  Morgan Stanley 1985-1987</p>	
Item 9.E.	<p><b>Participation or Interest in Client Transactions</b></p> <p>The Managing Member of Walden may purchase the same mutual funds and investment vehicles that Walden recommends to clients. These transactions are not prohibited because the trading of mutual funds is not likely to have an impact on the prices of the fund shares. Walden does not make recommendations to clients regarding the purchase of individual securities, so Walden does not have any potential conflict of interest. Also, Walden does not permit any activity that might be considered insider trading.</p>	
Item 10.	<p><b>Conditions for Managing Accounts</b></p> <p>Walden generally imposes an approximate minimum account size of \$1,000,000 to open and maintain an advisory account. The firm charges a minimum quarterly fee of \$2,500. However, this account minimum may be waived at the firm's discretion if, for example, the client appears to have significant potential for increasing assets under management.</p>	
Item 12.A. (1), (2), (3) and Item 12.B.	<p><b>Investment or Brokerage Discretion:</b></p> <p>Walden recommends that clients use Fidelity Investments ("Fidelity") or Charles Schwab &amp; Co. ("Schwab") as their brokerage/custodial firm, as both custodians provide broad access to no-load mutual funds, mail monthly statements to clients, provide advanced trading and operational software to Walden, and provide clients with access to account information over the Internet. Walden has arranged for discounted trading fees for purchasing and selling mutual funds that are not available on a no transaction fee basis. These trading fees are paid directly to the custodian. Walden does not receive any commissions from trading fees. The transaction fees charged by the custodians may be higher or lower than those charged by other firms.</p>	

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Item 12.A. (1), (2), (3) and Item 12.B. (continued)	<p>Certain clients may request Walden use a specific broker when executing transactions. Under these circumstances, Walden may use the brokers that have been selected by the client, but will inform the client when the rates negotiated between the client and the broker are not the best price or when the broker is not providing best execution.</p> <p>For Walden's other clients, Walden has discretionary authority to determine, without specific client consent, the broker-dealer to be used in any securities transaction or the commission rate to be paid. For these client accounts, Walden will select brokers who provide "best execution." In seeking "best execution," Walden considers a number of factors, including security price, commission charge, and promptness and reliability of execution. The value of any research products and services provided by the broker to Walden is also a factor in selecting brokers. Clients may pay brokerage commissions higher than that obtainable elsewhere from other brokers in return for these research products and services provided to Walden. Such higher commissions would be paid in accordance with Section 28(e) of the Securities Exchange Act of 1934, which requires Walden to determine in good faith that the commission paid is reasonable in relation to the value of the research provided. This determination may be based either in terms of the particular transaction involved or the overall responsibilities of Walden with respect to all accounts over which it exercises discretion. Accordingly, the research that is obtained normally benefits many, if not all of Walden's accounts, rather than just the one(s) for which the order is being executed. Not all research may be used by Walden in connection with the account which paid commissions to the broker providing research.</p> <p><b>Miscellaneous</b></p> <p><b>Code of Ethics<sup>(1), (2)</sup></b></p> <p>Walden has established the following restrictions in order to ensure its fiduciary responsibilities:</p> <ul style="list-style-type: none"><li>▪ Walden emphasizes the unrestricted right of the client to specify investment objectives, guidelines, and/or conditions on the overall management of their account.</li><li>▪ Associated persons or their immediate family members shall not buy or sell securities for their personal portfolio(s) where their decision is derived in whole or in part, by reason of the associated person's employment, unless the information is also available to the investing public on reasonable inquiry.</li><li>▪ No associated person of Walden shall prefer his or her own interest to that of the advisory client.</li><li>▪ Walden and its associated persons generally may not purchase and sell securities being considered for, or held by client accounts, without pre-clearance from Walden's Chief Compliance Officer.</li><li>▪ Walden and its employees generally may not participate in private placements or initial public offerings (IPOs) without pre-clearance from Walden's Chief Compliance Officer.</li><li>▪ Walden requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.</li><li>▪ Records will be maintained of all securities bought or sold by Walden, associated</li></ul>	

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	<p>persons of Walden, and related entities. A qualified representative of Walden will review these records on a regular basis.</p> <ul style="list-style-type: none"><li>Any individual not in observance of the above may be subject to termination.</li></ul> <p>The full text of Walden's Code of Ethics is available to you upon request.</p> <p>Footnotes:</p> <p>(1) This investment policy has been established recognizing that some securities being considered for purchase and/or sale on behalf of Walden's clients trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with Walden's records in the manner set forth above.</p> <p>(2) The foregoing does not apply to certain types of securities, such as obligations of the U.S. Government, and shares in open-end mutual funds. Open-end mutual funds are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds by Advisory Representatives are not likely to have an impact on the prices of the fund shares in which clients invest.</p> <p>In accordance with Section 204-A of the Investment Advisers Act of 1940, Walden also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Walden or any person associated with Walden.</p> <p><i>Privacy Policies</i></p> <p>Protecting client privacy is very important to Walden. Walden views protecting its client's private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, Walden has instituted policies and procedures to ensure that customer information is kept private and secure.</p> <p>Walden does not disclose any nonpublic personal information about its clients or former clients to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client's account, Walden may share some information with its service providers, such as transfer agents, custodians, broker/dealers, accountants, and lawyers. Walden restricts internal access to nonpublic personal information about the client to those employees who need to know that information in order to provide products or services to the client. As emphasized above, it has always been and will always be Walden's policy never to sell information about current or former customers or their accounts to anyone. It is also Walden's policy not to share information unless required to process a transaction, at the request of a customer, or as required by law.</p> <p><i>Proxy Voting</i></p> <p>Walden will not vote proxies on behalf of client accounts. At the client's request, Walden may offer clients advice regarding corporate actions and the exercise of proxy voting rights.</p>	

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