

FORM ADV**Uniform Application for Investment Adviser Registration****OMB APPROVAL**

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Part II – Page 1

Name of Investment Adviser: LOGe Solutions, LLC					
Address: (Number and Street)		(City)	(State)	(Zip Code)	Area Code: Telephone Number:
60 State Street Suite 700		Boston, MA	02109		617 275-8808

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

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

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

FORM ADV
Part II – Page 2

Applicant:
Loge Solutions, LLC

SEC File Number:
801-70173

Date:
4/27/2010

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:

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

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

- B. Does applicant call any of the services it checked above financial planning or some similar term?..... Yes ☐ No ☒

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

- ☒ (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

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

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

- | | |
|---|---|
| <input type="checkbox"/> A. Equity securities | <input type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | <input type="checkbox"/> I. Options contracts on: |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input checked="" type="checkbox"/> (1) securities |
| <input type="checkbox"/> (3) Foreign issuers | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | <input type="checkbox"/> J. Futures contracts on: |
| <input type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| <input type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| <input type="checkbox"/> G. Investment company securities: | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> (2) variable annuities | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <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 checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" 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 checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input type="checkbox"/> Corporate rating services | (8) <input checked="" type="checkbox"/> Other (explain on Schedule F) |

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

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Long term purchases (securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases (securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered options or spreading strategies |
| (3) <input 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 | |

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

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Applicant:
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4/27/2010

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, please 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 clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- formal education after high school
- year of birth
- business background for the preceding five years

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

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

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

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

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

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

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes ☐ No ☒

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

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

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Date:
4/27/2010

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 sell for itself securities it also recommended 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 advisory 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 condition 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 account, or holds itself out as providing financial planning or some similarly termed services:

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

See Schedule F.

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

See Schedule F.

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

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Applicant:
Loge Solutions, LLC

SEC File Number:
801-70173

Date:
4/27/2010

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
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |
| (2) amount of securities to be bought or sold? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |
| (3) broker or dealer to be used? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |
| (4) commission rates paid? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |

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 product 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
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |

(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 ☒

Answer all items. 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: Loge Solutions, LLC	SEC File No: 801-70173	4/27/2010
Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Loge Solutions, LLC			IRS Empl. Ident. No. 26-3130706

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

Item of Form (Identify)	Answer
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ITEM 1.D	<p>Advisory Services and Fees</p> <p>Investment Strategy</p> <p>The core Option Overlay strategies of LOGe Solutions, LLC ("Registrant") seek to offer investors the benefits of broad-based index investing with less volatility, reduced exposure to drawdowns, and at times a supplemental asset-based income stream. The strategies buy and sell listed options, paired with underlying securities positions, cash, and at times leverage, to achieve their results. Registrant currently offers ten Option Overlay strategies, which can be implemented stand-alone or in combination:</p> <ul style="list-style-type: none"> · LOGe US Large Cap Overlay – seeks investment results that correspond generally to the performance of the S&P 500 Index with lower volatility and less pronounced drawdowns. The Index is designed to measure the performance of the largest-capitalization sector of the United States equity market. The Strategy invests in ETFs, options, and cash, at times utilizing leverage to achieve its results. · LOGe US Small Cap Overlay – seeks investment results that correspond generally to the performance of the Russell 2000 Index with lower volatility and less pronounced drawdowns. The Index is designed to measure the performance of the smallest-capitalization sector of the United States equity market. The Strategy invests in ETFs, options, and cash, at times utilizing leverage to achieve its results. · LOGe Developed International Overlay – seeks investment results that correspond generally to the performance of the MSCI EAFE Index with lower volatility and less pronounced drawdowns. The Index is designed to measure performance of the international equity markets with exposure to Europe, Australasia, and the Far East. The Strategy invests in ETFs, options, and cash, at times utilizing leverage to achieve its results. · LOGe Emerging Markets Overlay – seeks investment results that correspond generally to the performance of the MSCI Emerging Markets Index with lower volatility and less pronounced drawdowns. The Index is designed to measure the equity performance of the global emerging markets. The Strategy invests in ETFs, options, and cash, at times utilizing leverage to achieve its results. · LOGe US Real Estate Overlay– seeks investment results that correspond generally to the performance of the Dow Jones U.S. Real Estate Index with lower volatility and less pronounced drawdowns. The Index is designed to measure the performance of the real estate sector of the United States equity market with exposure to REITs and real estate holding and development companies. The Strategy invests in ETFs, options, and cash, at times utilizing leverage to achieve its results. · LOGe Commodities Overlay – seeks investment results that correspond generally to the performance of the Deutsche Bank Liquid Commodity Index with lower volatility and less pronounced drawdowns. The Index is designed to measure the performance of a diversified basket of commodities. The Strategy invests in ETFs, options, and cash, at times utilizing leverage to achieve its results.
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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: Loge Solutions, LLC	SEC File No: 801-70173	4/27/2010
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	<p>· LOGe Conservative Target Risk Overlay – seeks investment results that correspond generally to the performance of the S&P Target-Risk Conservative Index with lower volatility and less pronounced drawdowns. The Index offers significant exposure to fixed income, while also providing increased opportunity for capital growth through equities. The Strategy utilizes one or more of LOGe’s Overlay Strategies and invests in ETFs, options, and cash, at times utilizing leverage to achieve its results.</p> <p>· LOGe Moderate Target Risk Overlay – seeks investment results that correspond generally to the performance of the S&P Target-Risk Moderate Index with lower volatility and less pronounced drawdowns. The Index offers significant exposure to fixed income, while also providing increased opportunity for capital growth through equities. The Strategy utilizes one or more of LOGe’s Overlay Strategies and invests in ETFs, options, and cash, at times utilizing leverage to achieve its results.</p> <p>· LOGe Growth Target Risk Overlay – seeks investment results that correspond generally to the performance of the S&P Target-Risk Growth Index with lower volatility and less pronounced drawdowns. The Index offers increased exposure to equities, while also using some fixed income exposure to diversify risk. The Strategy utilizes one or more of LOGe’s Overlay Strategies and invests in ETFs, options, and cash, at times utilizing leverage to achieve its results.</p> <p>· LOGe Aggressive Growth Target Risk Overlay – seeks investment results that correspond generally to the performance of the S&P Target-Risk Aggressive Index with lower volatility and less pronounced drawdowns. The Index emphasizes exposure to equities, maximizing opportunities for long-term capital accumulation. It may include small allocations in fixed income to enhance portfolio efficiency. The Strategy utilizes one or more of LOGe’s Overlay Strategies and invests in ETFs, options, and cash, at times utilizing leverage to achieve its results.</p> <p>LOGe Solutions also offers customized discretionary trading programs to clients to manage large concentrated stock positions, or to overlay or complement assets held-away from LOGe Solutions.</p> <p>Advisory Fees & Fee Structure</p> <p>Fees are billed quarterly in advance and primarily calculated as a percentage of notional assets managed by Registrant.</p> <p>The following fee schedule applies to the standard index-based strategies.</p> <table border="1"> <tr> <th>Asset Levels (Notional Exposure)</th> <th>Fees (Annual)</th> </tr> <tr> <td>First \$10mm</td> <td>0.90%</td> </tr> <tr> <td>Next \$10mm to \$50mm</td> <td>0.70%</td> </tr> <tr> <td>Portion over \$50mm</td> <td>0.50%</td> </tr> </table> <p>Discounted fees are available when Registrant acts in a subadvisory capacity to another</p>	Asset Levels (Notional Exposure)	Fees (Annual)	First \$10mm	0.90%	Next \$10mm to \$50mm	0.70%	Portion over \$50mm	0.50%
Asset Levels (Notional Exposure)	Fees (Annual)								
First \$10mm	0.90%								
Next \$10mm to \$50mm	0.70%								
Portion over \$50mm	0.50%								

Schedule F of Form ADV Continuation Sheet for Form ADV Part II	Applicant: Loge Solutions, LLC	SEC File No: 801-70173	4/27/2010
Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Loge Solutions, LLC			IRS Empl. Ident. No. 26-3130706

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	registered investment advisor. Customized fee schedules, including optional incentive performance fees, are applied when managing discrete strategies such as single stock and custom index exposure.
ITEM 2.G	We also offer our investment services to family offices.
ITEM 4.B.8	We derive our information from a variety of sources, including historical exchange data, published research, technical digests, news media, and from proprietary research provided by our principals. In some instances the material includes back-tested model results.
ITEM 6	<p>NEVILLE McCAGHREN (June 4th, 1976)</p> <p>Mr. McCaghren co-founded LOGe Solutions in 2007. Prior to LOGe, he served as Chief Technology Officer for Circle Financial Group, a high net worth investment think tank in New York City with over \$4 billion in investable assets. Prior to CFG, Mr. McCaghren was a Leaders For Manufacturing scholarship recipient at MIT where he earned a Sloan MBA and a Masters in Computer Science. Prior to MIT he was responsible for all software development and systems support as Director of Engineering for Arzoon, a web-based logistics provider in San Mateo, CA. He received a B.A. from Dartmouth College. Neville is an instrumented-rated pilot and lives in Lincoln, MA with his wife and two children.</p> <p>SCOTT ELISHA (June 30th, 1964)</p> <p>Mr. Elisha is a co-founder and the Head Trader at LOGe Solutions. Mr. Elisha was previously Head Trader on the Pacific Options Exchange at Citadel Derivatives Group. Prior to Citadel, he was a Partner at Wolverine Trading LLC for 10 years, one of the largest options market makers in the world. From 1994-1998 he served as Wolverine's Head Trader in charge of all index trading in the OEX complex on the CBOE, and from 1998-2004 he was responsible for all trading in the San Francisco office on the Pacific Exchange. Prior to Wolverine, he was a Senior Options Trader and Associate Director at O'Connor and Associates in Chicago. He attended Ball State University. Scott lives in the San Francisco Bay Area and is married with two children.</p> <p>THOMAS KENNETT (October 3rd, 1948)</p> <p>Mr. Kennett is the Chief Compliance Officer and Chief Operating Officer at LOGe Solutions. He has over 30 years of securities, investment management, insurance, and banking experience at executive levels. He holds FINRA 7, 24, 39, 66 registrations. Mr. Kennett was previously Director of Sales at Niemann Capital Management, a \$1.2 billion tactical investment manager. Mr. Kennett has served as CEO of a FINRA member broker-dealer, an SEC registered investment adviser, an international institutional asset manager, and affiliates of an NYSE listed bank holding corporation and was senior executive vice president, institutional markets, of the bank. He has held positions at Jefferson Standard, Travelers, Guarantee Financial, American Savings Bank, Smith Barney, Delaware Capital Management, MONY, and AXA Financial. Tom graduated from UC Irvine in Philosophy.</p>

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ITEM 7.A.	<p>Neville McCaghren is President of The Delafield Company, a technology consulting firm servicing both financial and non-financial firms. His time devoted to these activities is limited and principally after market hours.</p> <p>Scott Elisha is a limited partner of and business consultant to Bridges LP, a restaurant and wine bar based in Danville, CA. His time devoted to these activities is limited and principally after market hours.</p> <p>Thomas Kennett is a private business consultant to securities and investment advisory firms as well as to owners of small businesses. He is securities registered with Growth Capital Services Inc, a non-affiliated registered broker-dealer for which he performs various contract consulting services.</p>
ITEM 9.E.	<p>LOGe Solutions and its access persons (generally officers and employees) may trade in the same securities that LOGe Solutions buys or sells for clients and may own securities of issuers whose securities LOGe Solutions purchases for clients. All supervised persons of Registrant have been designated as access persons.</p> <p>Access person trading is governed by LOGe Solutions' Code of Ethics, which has been established to comply with Rule 204A-1 of the Investment Advisers Act. The Code of Ethics requires all access persons to ensure that the interests of clients come first. The Code of Ethics contains a variety of personal trading restrictions, which must be followed by all access persons when trading or considering a trade in the same security as clients, as well as when trading securities that may not be deemed appropriate or under consideration to purchase for client accounts. Access persons may not trade in a manner that would profit from security trades made for clients. All access persons are required to comply with all applicable federal and state securities laws, including those governing insider trading. Initial and annual reports of personal holdings are required of all access persons, and access persons must provide quarterly reports of reportable securities transactions. All access persons trading and holdings are reviewed by the Chief Compliance Officer, or his designee. Access persons not complying with the Code of Ethics may be subject to disciplinary actions.</p> <p>LOGe Solutions will provide a copy of its Code of Ethics to any client or prospective client upon written request to LOGe Solutions at its principal address or by calling 617-275-8808.</p>
ITEM 10	<p>Registrant generally requires a minimum of \$250,000 to open an account. The client must meet certain suitability qualifications, including demonstrating through disclosure on the new account form a clear understanding of the objectives of any strategy selected and a willingness to assign discretion to the firm and its portfolio managers over the account. The firm retains the right at its sole discretion to accept or deny an account to any prospective client, and to discharge any client who does not maintain required information and assets. See response to Part II, 1, D.</p>
ITEM 11.A	<p>Accounts are reviewed regularly, typically daily by portfolio managers and monthly by the Chief Compliance Officer. Quarterly client reports are generated and made available to clients. More frequent reviews may occur, as necessary.</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: Loge Solutions, LLC	SEC File No: 801-70173	4/27/2010
Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Loge Solutions, LLC			IRS Empl. Ident. No. 26-3130706

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ITEM 12.A	Registrant has full discretion to determine the identity and the amount of all securities to be bought and sold by each client, and to determine which broker or dealer is to be used in each transaction and the commission rates to be paid in such transactions. See also responses to Part II, 1, D and Part II, 12, B.
ITEM 12.B	In selecting brokers or dealers to execute transactions for a client, Registrant will not solicit competitive bids and has no obligation to seek the lowest available commission cost. Registrant may not always negotiate "execution only" commission rates. In addition to research, the services that may be provided by brokers may include, without limitation, services such as special execution capabilities, clearance, settlement, net pricing, online pricing, block trading and block positioning capabilities, willingness to execute related or unrelated difficult transactions in the future, online access to computerized data regarding clients' accounts, real-time market data, performance measurement data, consultations, economic and market information, portfolio strategy advice, industry and company comments, technical data, recommendations, general reports, financial strength and stability, efficiency of execution and error resolution, quotation services, the availability of securities to borrow for short sales.
ITEM 13.B	Registrant has authority to compensate persons who introduce investors to the fund, at registrant's own expense and in compliance with applicable securities laws and regulations.