

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

OMB Number: 3235-0049  
Expires: August 31, 2012  
Estimated Average burden  
Hours per response.....4.32

Name of Investment Adviser:						
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:

**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.**

**Table of Contents**

<b><u>Item Number</u></b>	<b><u>Item</u></b>	<b><u>Page</u></b>
1	Advisory Services and Fees .....	2
2	Types of Clients .....	2
3	Types of Investments .....	3
4	Methods of Analysis, Sources of Information and Investment Strategies .....	3
5	Education and Business Standards .....	4
6	Education and Business Background .....	4
7	Other Business Activities .....	4
8	Other Financial Industry Activities or Affiliations .....	4
9	Participation or Interest in Client Transactions .....	5
10	Conditions for Managing Accounts .....	5
11	Review of Accounts .....	5
12	Investment or Brokerage Discretion .....	6
13	Additional Compensation .....	6
14	Balance Sheet .....	6
	Continuation Sheet .....	Schedule F

(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.

Applicant:

SEC File Number:

Date:

801-

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

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

- |  |                              |                             |
|--|------------------------------|-----------------------------|
| B. Does applicant call any of the services it checked above financial planning or some similar term? . . . . . | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|

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

- |   |  |
|---|--|
| <input 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 type="checkbox"/> A. Individuals                      | <input 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 type="checkbox"/> C. Investment companies             | <input type="checkbox"/> G. Other (describe on Schedule F)                                  |
| <input type="checkbox"/> D. Pension and profit sharing plans |   |

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

Applicant:

SEC File Number:  
801-

Date:

**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 type="checkbox"/> (1) exchange-listed securities                             | <input type="checkbox"/> I. Options contracts on:                   |
| <input type="checkbox"/> (2) securities traded over-the-counter                     | <input 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 type="checkbox"/> (3) mutual fund shares                                     |   |

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

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

- |  |  |
|--|--|
| (1) <input type="checkbox"/> Charting    | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input 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 type="checkbox"/> Annual reports, prospectuses, filings with the |
| (3) <input type="checkbox"/> Research materials prepared by others | Securities and Exchange Commission  |
| (4) <input type="checkbox"/> Corporate rating services             | (7) <input type="checkbox"/> Company press releases                         |
|  | (8) <input 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 type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions   |
| (2) <input type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input type="checkbox"/> Option writing, including covered options,<br>uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days)                 | (7) <input type="checkbox"/> Other (explain on Schedule F)   |
| (4) <input type="checkbox"/> Short sales  |  |

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

Applicant:

SEC File Number:  
801-

Date:

**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
- year of birth
- formal education after high school
- 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)**

Applicant:

SEC File Number:  
801-

Date:

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

Applicant:

SEC File Number:  
801-

Date:

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  |                          |                          |
|--|--------------------------|--------------------------|
|  | Yes                      | No                       |
| (1) securities to be bought or sold? .....           | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of securities to be bought or sold? ..... | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? .....               | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? .....                     | <input type="checkbox"/> | <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                      | No                       |
|   | <input type="checkbox"/> | <input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes                      | No                       |
|   | <input type="checkbox"/> | <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

**Schedule F of  
Form ADV**  
Continuation Sheet for Form ADV Part II

Applicant: <b>Nikulski Financial, Inc.</b>	SEC File Number:  801-	Date: 09/2010
---	------------------------------	------------------

(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: <b>Nikulski Financial, Inc.</b>	IRS Empl. Ident. No.:
Item of Form (identify)	Answer

Item 1.D.	<p><b><u>Advisory Services and Fees</u></b></p> <p>Nikulski Financial, Inc. (hereinafter “Firm” or the “Adviser”) is formed under the laws of the State of IA. The Adviser offers investment advisory services to individuals, high-net worth individuals, pension and profit sharing plans trusts, estates, charitable organizations, and corporations or other business entities. This Schedule F narrative provides clients with information regarding the Adviser and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory client of the Firm.</p> <p>Please contact Brian Nikulski, President and Chief Compliance Officer, if you have any questions about this Schedule F narrative. Additional information about the Adviser 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 the Adviser is 151569.</p> <p>Individuals associated with the Adviser will provide its investment advisory services. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on behalf of the Firm. Such individuals are known as Investment Adviser Representatives (IARs).</p> <p><b><u>Portfolio Management Services</u></b></p> <p>Adviser’s portfolio management service is designed to assist clients in meeting their financial goals through the use of financial investments. For each portfolio management client, Adviser will conduct one or more meetings (in person if possible, otherwise via telephone conference) with the client in order to understand the client’s current financial situation, existing resources, financial goals, and tolerance for risk. Based on the foregoing, Adviser will propose an investment approach to the client. Adviser may propose an investment portfolio consisting of exchange traded funds, mutual funds, individual stocks or bonds, or other securities. After the investment plan is proposed, Adviser will work with the client to establish or transfer investment accounts so that Adviser is able to manage the client’s portfolio.</p> <p>The Adviser provides portfolio management services on a non-discretionary and discretionary basis. Accordingly, for discretionary portfolio management, the Adviser is authorized to perform various functions, at the client’s expense, without further approval from the client. Such functions include the determination of securities to be purchased/sold and the amount of securities to be purchased/sold. Once the relevant accounts are under Adviser’s management, Adviser will review such accounts on a regular basis and at least quarterly. Adviser may periodically rebalance or adjust client accounts under its management. If the client experiences any significant changes to his/her financial or personal circumstances, the client must notify Adviser so that Adviser can consider such information in managing the client’s investments.</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:  
**Nikulski Financial, Inc.**

SEC File Number:  
801-

Date:  
09/2010

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

Item 1.D.  
(Continued)

Non-discretionary and discretionary portfolio management services may include client assets held by a custodian other than the custodian(s) described in Item 12B below. Adviser offers the following portfolio management models to clients:

Dynamic Allocation Strategy

A tactical asset management strategy primarily using individual stocks, bonds & ETFs. When appropriate, Adviser also incorporates various options strategies and uses closed end funds for income. A combination of technical analysis and fundamental analysis will be used in the buy and sell decisions. The objective in this strategy is to protect wealth and grow wealth as opposed to buying and holding investments through times of severe market depreciation.

On an annualized basis, the Adviser's standard fee for continuous portfolio management services using the **Dynamic Allocation Strategy** is as follows:

Assets Under Management	Annual Advisory Fee
Up to \$1,000,000	1.50%
\$1,000,001 to \$2,500,000	1.25%
\$2,500,001 to \$4,000,000	1.00%
Over \$4,000,000	By Negotiation

ETF Model Portfolios

There are seven different ETF Models. Moderately Conservative (MC), Moderate (M) & Moderately Aggressive (MA); three for accounts under \$50,000, 3 for accounts greater than \$50,000 and a Sector Rotation (SR) strategy that all strategies incorporate to different degrees. The MC portfolios have 10% in SR, M have 20%, and MA have 30% in SR strategy. The Models will be managed with the remaining allocation into broad categories such as S&P 500, Russell 2000, Lehman Brothers Agg Bond, EAFE Index, etc. Rebalancing is done when the strategy falls out of the accepted level of variance. However, there is always the option to sell out of the broad categories to protect principal.

On an annualized basis, the Adviser's standard fee for continuous portfolio management services using **ETF Model Portfolios** is as follows:

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:  
**Nikulski Financial, Inc.**

SEC File Number:  
801-

Date:  
09/2010

(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:  
**Nikulski Financial, Inc.**

IRS Empl. Ident. No.:

Item of Form  
(identify)

Answer

Item 1.D.  
(Continued)

Assets Under Management	Annual Advisory Fee
Up to \$1,000,000	1.25%
\$1,000,001 to \$2,500,000	1.00%
\$2,500,001 to \$4,000,000	0.85%
Over \$4,000,000	By Negotiation

The fee schedules above are PER ACCOUNT, NOT Aggregated (actual fees can vary from the schedules).

The Adviser's annual fee shall be negotiable in certain cases and be pro-rated and paid in advance on a quarterly basis. No increase in the annual fee shall be effective without prior written notification to the client. Clients are responsible for custodial fees and transaction costs.

Unless the client requests direct billing or the client's custodian does not facilitate the direct deduction of fees, fees will be automatically deducted from the client's account. If fees are deducted from the client's account, the client adheres and acknowledges the following:

- The custodian sends statements at least quarterly to the client showing all disbursements for the custodian account, including the amount of the advisory fees;
- The client provides authorization permitting Adviser to be directly paid by these terms;
- If Adviser sends a copy of its invoice to the client, Adviser sends a copy of its invoice to the custodian at the same time it sends its invoice to the client;
- If Adviser sends a copy of its invoice to the client, Adviser's invoice includes a legend as required by paragraph (a)(2) of rule 206(4)-2 under the Investment Advisers Act of 1940.\*

\*The legend urges the client to compare information provided in their statements with those from the qualified custodian in account opening notices and subsequent statements sent to the client for whom the adviser opens custodial accounts with the qualified custodian.

For client assets held by a custodian other than the custodian(s) described in Item 12B below, the fee will be billed quarterly via invoice to the client, and shall be paid within ten (10) days of the invoice date.

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:  
**Nikulski Financial, Inc.**

SEC File Number:

801-

Date:  
09/2010

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

Item 1.D.  
(Continued)

Either party may terminate the agreement at any time by providing written notice to the other party. Full refunds will only be made in cases where cancellation occurs within five (5) business days of signing the Adviser's investment advisory agreement. After five (5) business days, clients will receive pro-rata refunds, which take into account work completed by the Adviser on behalf of the client. The client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the client. Refunds will be given on a pro-rata basis.

In addition to the Adviser's annual investment management fee, the client may also incur certain charges imposed by unaffiliated third parties. Such charges include, but are not limited to, custodial fees, brokerage commissions, transaction fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund purchased for the account which shall be disclosed in the funds prospectus (i.e., fund management fees and other fund expenses), wire transfer fees and other fees and taxes on brokerage accounts and securities transactions.

No portion of Adviser's compensation shall be based on capital gains or capital appreciation of assets under management except as provided for under the Investment Advisers Act of 1940 or similar State statutes and rules.

Adviser will adhere to the SEC Staff No-Action Letter, *SMC Capital, Inc.* in the event that orders are aggregated.

**Wrap Fee Portfolio Management Services (Strategic Asset Management)**

The Adviser may also offer its portfolio management service on a wrapped fee program. Adviser's Strategic Asset Management service is designed to assist clients in meeting their financial goals through the use of financial investments. For each portfolio management client, Adviser will conduct one or more meetings (in person if possible, otherwise via telephone conference) with the client in order to understand the client's current financial situation, existing resources, financial goals, and tolerance for risk. Based on the foregoing, Adviser will propose an investment approach to the client. Adviser may propose an investment portfolio consisting of exchange traded funds, mutual funds, individual stocks or bonds, or other securities. After the investment plan is proposed, Adviser will work with the client to establish or transfer investment accounts so that Adviser is able to manage the client's portfolio.

The Adviser provides its Strategic Asset Management service on a non-discretionary and discretionary basis. Accordingly, for discretionary management, the Adviser is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include the determination of securities to be purchased/sold and the amount of securities to be purchased/sold. Once the relevant

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:  
**Nikulski Financial, Inc.**

SEC File Number:

801-

Date:  
09/2010

(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:

**Nikulski Financial, Inc.**

IRS Empl. Ident. No.:

Item of Form  
(identify)

Answer

Item 1.D.  
(Continued)

accounts are under Adviser's management, Adviser will review such accounts on a regular basis and at least quarterly. Adviser may periodically rebalance or adjust client accounts under its management. If the client experiences any significant changes to his/her financial or personal circumstances, the client must notify Adviser so that Adviser can consider such information in managing the client's investments.

Non-discretionary and discretionary management services may include client assets held by a custodian other than the custodian(s) described in Item 12B below. Adviser offers the following portfolio management models to clients:

Dynamic Allocation Strategy

A tactical asset management strategy primarily using individual stocks, bonds & ETFs. When appropriate Adviser also incorporates various options strategies and uses closed end funds for income. A combination of technical analysis and fundamental analysis will be used in the buy and sell decisions. The objective in this strategy is to protect wealth and grow wealth as opposed to buying and holding investments through times of severe market depreciation.

On an annualized basis, the Adviser's wrapfee program for continuous portfolio management services using the **Dynamic Allocation Strategy** is as follows:

Assets Under Management	Annual Advisory Fee
Up to \$1,000,000	1.75%
\$1,000,001 to \$2,500,000	1.50%
\$2,500,001 to \$4,000,000	1.25%
Over \$4,000,000	By Negotiation

ETF Model Portfolios

There are seven different ETF Models. Moderately Conservative (MC), Moderate (M) & Moderately Aggressive (MA); three for accounts under \$50,000, 3 for accounts greater than \$50,000 and a Sector Rotation (SR) strategy that all strategies incorporate to different degrees. The MC portfolios have 10% in SR, M have 20% & MA have 30% in SR strategy. The Models will be managed with the remaining allocation into broad categories such as S&P 500, Russell 2000, Lehman Brothers Agg Bond, EAFE Index, etc. Rebalancing is done when the strategy falls out of the accepted level of variance. However, there is always the option to sell out of the broad categories to protect principal.

On an annualized basis, the Adviser's wrapfee program for continuous portfolio management services using **ETF Model Portfolios** is as follows:

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:  
**Nikulski Financial, Inc.**

SEC File Number:

801-

Date:  
09/2010

(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:

**Nikulski Financial, Inc.**

IRS Empl. Ident. No.:

Item of Form  
(identify)

Answer

<b>Assets Under Management</b>	<b>Annual Advisory Fee</b>
Up to \$1,000,000	1.50%
\$1,000,001 to \$2,500,000	1.25%
\$2,500,001 to \$4,000,000	1.00%
Over \$4,000,000	By Negotiation

The fee schedules above are PER ACCOUNT, NOT Aggregated (actual fees can vary from the schedules).

These services are provided as a wrap account. Thus, the client will not incur transaction charges imposed by unaffiliated third parties. The client, though, may pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), wire transfer fees and other fees and taxes on brokerage accounts and securities transactions.

The Adviser's annual fee shall be negotiable in certain cases and be pro-rated and paid in advance on a quarterly basis. No increase in the annual fee shall be effective without prior written notification to the client. Clients are responsible for custodial fees and transaction costs.

Unless the client requests direct billing or the client's custodian does not facilitate the direct deduction of fees, fees will be automatically deducted from the client's account. If fees are deducted from the client's account, the client adheres and acknowledges the following:

- a) The custodian sends statements at least quarterly to the client showing all disbursements for the custodian account, including the amount of the advisory fees;
- b) The client provides authorization permitting Adviser to be directly paid by these terms;
- c) If Adviser sends a copy of its invoice to the client, Adviser sends a copy of its invoice to the custodian at the same time it sends its invoice to the client;
- d) If Adviser sends a copy of its invoice to the client, Adviser's invoice includes a legend as required by paragraph (a)(2) of rule 206(4)-2 under the Investment Advisers Act of 1940.\*

\*The legend urges the client to compare information provided in their statements with those from the qualified custodian in account opening notices and subsequent statements sent to the client for whom the adviser opens custodial accounts with the qualified custodian.

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:  
**Nikulski Financial, Inc.**

SEC File Number:

801-

Date:  
09/2010

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

For client assets held by a custodian other than the custodian(s) described in Item 12B below, the fee will be billed quarterly via invoice to the client, and shall be paid within ten (10) days of the invoice date.

Either party may terminate the agreement at any time by providing written notice to the other party. Full refunds will only be made in cases where cancellation occurs within five (5) business days of signing the Adviser's investment advisory agreement. After five (5) business days, clients will receive pro-rata refunds, which take into account work completed by the Adviser on behalf of the client. The client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the client. Refunds will be given on a pro-rata basis.

Further details about the wrap fees charged by Adviser for the accounts in its wrap fee program may be found in Schedule H of this Form ADV.

No portion of Adviser's compensation shall be based on capital gains or capital appreciation of the Assets except as provided for under the Investment Advisers Act of 1940 or similar State statutes and rules.

Adviser will adhere to the SEC Staff No-Action Letter, SMC Capital, Inc. in the event that orders are aggregated.

**Financial Consulting Services**

Adviser also offers financial planning and financial consulting services to its clients. These services will be provided pursuant to a written client agreement. Adviser can work with a client to develop a written financial plan or provide consulting services on specific issues or areas that are of concern to the client.

The goal of a financial planning engagement is to provide the client with a written financial plan that will assist the client in meeting his/her financial goals. Adviser and the client will discuss and agree upon the specific topics to be covered by the financial plan. Such topics may include investment planning, retirement planning, tax planning, insurance planning, estate planning, or business planning. Adviser will conduct one or more meetings (in person if possible, otherwise via telephone conference) with the client in order to understand the client's current financial situation, financial goals, specific issues or questions, and topics to be covered by the financial plan. Adviser may also request copies of relevant financial documents, such as account statements, income tax returns, insurance policies, retirement plans, estate planning documents, and business financial statements. Adviser will then prepare a written financial plan that summarizes the client's current financial situation and offers observations and recommendations. Adviser prepares the financial plan based on the information provided to Adviser by the client and as of the date that the plan is

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:  
**Nikulski Financial, Inc.**

SEC File Number:

801-

Date:  
09/2010

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

	<p>submitted to the client. Adviser undertakes no responsibility to update the financial plan unless Adviser and the client agree upon a subsequent financial planning engagement.</p> <p>Adviser also offers financial consulting services on specific issues or areas that are of concern to the client. Adviser will obtain background information on the issues or topics to be covered by the financial consulting engagement through client meetings and documents provided by the client. Adviser will then offer advice or recommendations to the client. Such advice or recommendations may or may not be in writing depending on the nature of the engagement.</p> <p>Adviser generally offers financial planning and financial consulting services on an hourly basis of no more than \$500 per hour, which rate may be negotiable depending on the nature and complexity of the client's circumstances. For client engagements billed on an hourly basis, Adviser will provide the client with an estimate of total projected hours at the outset of the engagement.</p> <p>For financial planning engagements, Adviser may also charge a negotiable flat fee generally within the range of \$500 - \$10,000, the exact amount of which is dependent upon the level and scope of services. One half of the total estimated fixed and hourly fees (or a specified amount agreed by both Adviser and the client) are due and payable at the time the client's agreement is executed, and the remainder of the fees are due upon presentation of a plan or the rendering of consulting services. In the event that a client cancels a financial planning or financial consulting agreement, the client shall be billed for actual hours spent on the project times the agreed upon hourly rate.</p> <p>Additionally, Adviser may also offer ongoing financial consulting services to its clients on an annual retainer paid quarterly via invoice. For all financial planning/financial consulting services, the client will be invoiced directly for the fixed or hourly fees.</p> <p>Adviser financial consulting fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses, which shall be incurred by the client. Financial consultations shall be completed within six (6) months of the prepayment of any fees.</p> <p>Either party may terminate the financial planning/financial consulting agreement at any time by providing written notice to the other party. Full refunds will only be made in cases where cancellation occurs within five (5) business days of signing the financial planning/financial consulting agreement. After five (5) business days, the client will receive a pro-rata refund, which takes into account work completed by Adviser on behalf of the client. The client will incur charges for bona fide advisory services rendered to the point of termination, and such fees will be due and payable by the client. In the event that Adviser is compensated through a flat fee and the</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:  
**Nikulski Financial, Inc.**

SEC File Number:

801-

Date:  
09/2010

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

client terminates the agreement prior to completion of the work specified in the financial planning/financial consulting agreement, the client shall be billed for actual hours spent prior to termination times the hourly rate.

**General Information on Advisory Services and Fees**

In certain circumstances, advisory fees and account minimums may be negotiable based upon prior relationships as well as related account holdings. The fees charged are calculated as described above and are not charged on the basis of a share of capital gains or capital appreciation of the client's investments.

It is important to note that it is the client's responsibility to verify the accuracy of the fee calculation. The client's account custodian will not determine whether the fee is properly calculated.

A client could invest in a mutual fund directly, without the services of Adviser. In that case, the client would not receive the services provided by Adviser which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate for the client's financial situation and objectives. Accordingly, clients should review both the fees charged by the funds and the fees charged by Adviser to fully understand the total amount of fees to be paid, and to thereby evaluate the advisory services being provided.

Advisory recommendations are based on the client's financial situation at the time the services are provided and are based on financial information disclosed by the client to Adviser. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and past trends and performance of the market and economy. Past performance is in no way an indication of future performance. As the client's financial situation, goals, objectives, or needs change, the client must notify Adviser promptly.

In performing its services, Adviser shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. The client is free to accept or reject any recommendation made by Adviser. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify Adviser if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Adviser's previous recommendations and/or services. Adviser's clients are advised to promptly notify Adviser if there are ever any changes in their financial situation or investment objectives, or if they wish to impose any reasonable restrictions upon Adviser's investment management services.

Neither Adviser nor the client may assign the investment advisory agreement without the prior written consent of the other party. Transactions that do not result in a change of actual control or management of Adviser shall not be considered an

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: <b>Nikulski Financial, Inc.</b>	SEC File Number: 801-	Date: 09/2010
---	--------------------------	------------------

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

	<p>assignment.</p> <p>The fees charged are calculated as described above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory client (15 U.S.C. §80b-5(a)(1)).</p> <p>Advice offered by the Adviser may involve investments in money market funds. Clients are hereby advised that all fees paid to the Adviser for investment advisory services are separate and distinct from the fees and expenses charged by money market funds (described in each fund's prospectus) to their shareholders. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Further, there may be transaction charges involved with purchasing or selling of securities. The Adviser does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the client funds or securities. The client should review all fees charged by money market funds, the Adviser, and others to fully understand the total amount of fees to be paid by the client.</p> <p>Adviser shall never have custody of any client funds or securities (except for the direct deduction of advisory fees), as the services of a qualified and independent custodian will be used to hold client accounts as described in Item 12(B) of Schedule F. The Adviser does not earn any commissions from unaffiliated broker-dealers. In any event, client is under no obligation to act upon the Adviser's recommendations and if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the Adviser, or any of the unaffiliated broker-dealers listed in Item 12(B) of Schedule F.</p> <p>Adviser hereby discloses that clients may receive the same or comparable services from other financial advisors for a lower fee.</p> <p>A copy of Adviser's written disclosure statement as set forth on Part II of Form ADV shall be provided to each client prior to or contemporaneously with the execution of the <i>Investment Advisory Agreement or Financial Planning Agreement</i>. Any client who has not received a copy of Adviser's written disclosure statement at least forty-eight (48) hours prior to executing the respective client agreement shall have five (5) business days subsequent to executing the agreement to terminate the Adviser's services without penalty.</p>
Item 5.	<p><b><u>Education and Business Standards</u></b></p> <p>The Adviser generally requires a college degree and/or five (5) years of equivalent industry experience for someone to become an investment advisory representative with the firm. In addition, all investment advisory representatives must have obtained all required licenses or a professional designation such as the CFP®.</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:  
**Nikulski Financial, Inc.**

SEC File Number:

801-

Date:  
09/2010

(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:

**Nikulski Financial, Inc.**

IRS Empl. Ident. No.:

Item of Form  
(identify)

Answer

Item 6.

**Education and Business Background****Brian Nikulski**

Year of Birth: 1972

**Business Experience**

2008 – Present, Nikulski Financial, Inc., President, Chief Compliance Officer (since 2009)

2009 – Present, Coder Company, Independent Contractor

2006 – 2009, Cambridge Investment Research, Inc., Independent Contractor

2006 – 2009, Cambridge Investment Research Advisors, Inc., Independent Contractor

2004 – 2006, American Express Financial Advisors Inc., Independent Contractor

2004 – 2006, IDS Life Insurance Company, Independent Contractor

**Education, Professional Designations, Licenses and Exams**

1995 – Truman State University, BS Business Administration (Finance) &amp; Minor in Economics

1992 – Kishwaukee College, AS Accounting

2000 – CFP®

2003 – Series 10

2002 – Series 9

2001 – Series 24

1998 – Series 65, Accident &amp; Health, Life, Variable Life/Variable Annuity Insurance

1995 – Series 7 &amp; 63

Item 7A.B.

**Other Business Activities**

Brian Nikulski is an independent contractor for the Coder Company (a consulting firm). In his individual capacity, Mr. Nikulski assists in finding capital for companies the Coder Company consults with for a fee. Compensation is based upon work done (Approx. \$10,000/yr). Additional forms of compensation may be warrants, rights or shares of the company where consulting work is performed. Mr. Nikulski may invest personal assets into companies where consulting work is performed. Mr. Nikulski may also recommend Advisory clients, though the client is free to do otherwise, to invest into programs as well.

Mr. Nikulski is a licensed insurance agent/broker with various insurance companies/agencies. He may receive the normal commissions for securities or insurance sales in his separate role as an insurance agent/broker. Mr. Nikulski devotes approximately 5 hours per month on this other business.

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:  
**Nikulski Financial, Inc.**

SEC File Number:  
801-

Date:  
09/2010

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

Item 9.D.E.	<p><b><u>Participation or Interest in Client Transactions</u></b></p> <p>Mr. Nikulski or individuals associated with the Adviser may recommend to clients that they buy or sell securities or investment products in which the Adviser or a related person has some financial interest.</p> <p>Mr. Nikulski or individuals associated with the Adviser may also recommend to clients that they buy or sell – for their personal account(s) - investment products identical to those recommended to clients. It is the general policy of the Adviser that no employee may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts. If conflicting circumstances were to ever arise, the Adviser will always act in the client's best interest.</p>
Item 12.A.B.	<p><b><u>Investment or Brokerage Discretion</u></b></p> <p>The Adviser provides discretionary and non-discretionary portfolio management services where the investment advice provided is custom tailored to meet the individualized needs and investment objectives of the client. Accordingly, under discretionary accounts, the Adviser is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include the determination of securities to be purchased/sold and the amount of securities to be purchased/sold.</p> <p><b><u>Suggestion of Brokers to Clients</u></b></p> <p>The Adviser participates in the TD AMERITRADE Institutional program. TD AMERITRADE Institutional is a division of TD AMERITRADE, Inc. ("TD AMERITRADE") member FINRA/SIPC. TD AMERITRADE is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. TD AMERITRADE offers to independent investment advisers, services which include custody of securities, trade execution, clearance and settlement of transactions. The Adviser receives some benefits from TD AMERITRADE through its participation in the program. (Please see the disclosure under Item 13.A. below.)</p> <p>The Adviser participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade "), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. The Adviser receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 13.A. Below).</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:  
**Nikulski Financial, Inc.**

SEC File Number:

801-

Date:  
09/2010

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

In certain cases, the Adviser has obtained the written consent of clients to engage in discretionary trading of securities. Such discretion is limited to the authority to select securities to be bought or sold and/or the amount of securities to be bought or sold. The Adviser does not possess the authority without the client's consent to determine the broker or dealer to be used or the commission rates paid. In any event, the Adviser often suggests that clients execute trades through TD Ameritrade.

The Adviser reasonably believes that in the case of managed accounts, TD Ameritrade, Inc.'s blend of execution services, commission and transaction costs as well as professionalism allows the Adviser to seek best execution and competitive prices. Additionally the Adviser believes that in case of financial plan recommendations being implemented, that TD Ameritrade, Inc.'s blend of execution services, commission and transaction costs as well as professionalism allows the Adviser to recommend TD Ameritrade, Inc. for the establishment of a brokerage account. At all times, financial consulting clients are free to execute their plan recommendations through any broker-dealer without the assistance of the Adviser or its investment advisory representatives. As mentioned previously, clients grant the Adviser discretionary authority over the selection and amount of securities to be bought and/or sold for their account without obtaining their prior consent or approval. The trading authority will allow the Adviser to take advantage of time-sensitive market conditions in securities, which are consistent with the client's prior stated investment objectives. However, the Adviser's investment authority may be subject to specified investment objectives, guidelines, and/or conditions imposed by the client. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry.

**Directed Brokerage**

Some clients may instruct Adviser to use one or more particular broker-dealers for the transactions in their accounts. Clients who may want to direct Adviser to use a particular broker-dealer should understand that this may prevent Adviser from effectively negotiating brokerage costs on their behalf. This arrangement may also prevent Adviser from obtaining the most favorable net price and best execution. Thus, when directing brokerage business, clients should consider whether the commission expenses, execution, clearance, and settlement capabilities that they will obtain through their broker-dealer are adequately favorable in comparison to those that Adviser would otherwise obtain for its clients. In addition, a disparity in commission charges may exist between the commissions charged to other clients.

Adviser reserves the right to decline acceptance of any client account that directs the use of a broker dealer other than T.D. Ameritrade if Adviser believes that the broker dealer would adversely affect Adviser's fiduciary duty to the client and/or ability to effectively service the client portfolio.

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: <b>Nikulski Financial, Inc.</b>	SEC File Number:  801-	Date: 09/2010
---	------------------------------	------------------

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

Item 13.A.	<p><b><u>Additional Compensation</u></b></p> <p>While the Adviser, and its associated persons, endeavor at all times to put the interest of the clients first as part of their fiduciary duty, clients should be aware that receipt of additional compensation in itself creates a potential conflict of interest.</p> <p>As disclosed under Item 12.B. above, the Adviser participates in TD AMERITRADE's institutional customer program and the Adviser may require clients to maintain accounts with TD AMERITRADE/recommend TD AMERITRADE to clients. There is no direct link between the Adviser's participation in the program and the investment advice it gives to its Clients, although the Adviser receives economic benefits through its participation in the program that are typically not available to TD AMERITRADE retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have Advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Adviser by third party vendors.</p> <p>TD AMERITRADE may also have paid for business consulting and professional services received by the Adviser's related persons and may also pay or reimburse expenses (including travel, lodging, meals [and entertainment] expenses) for the Adviser's personnel to attend conferences or meetings relating to the program or to TD AMERITRADE's Advisor custody and brokerage services generally. Some of the products and services made available by TD AMERITRADE through the program may benefit the Adviser but may not benefit its client accounts. These products or services may assist the Adviser in managing and administering client accounts, including accounts not maintained at TD AMERITRADE. Other services made available by TD AMERITRADE are intended to help the Adviser manage and further develop its business enterprise. The benefits received by the Adviser or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD AMERITRADE. As part of its fiduciary duties to clients, the Adviser endeavors at all times to put the interests of its clients first. Clients should be advised, however, that the receipt of economic benefits by the Adviser or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Adviser's choice of TD AMERITRADE for custody and brokerage services.</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: <b>Nikulski Financial, Inc.</b>	SEC File Number:  801-	Date: 09/2010
---	------------------------------	------------------

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

Miscellaneous	<p><b><u>Code of Ethics</u></b></p> <p>As certain situations may represent a conflict of interest, the Adviser has established the following restrictions in order to ensure its fiduciary responsibilities:</p> <ul style="list-style-type: none"> <li>▪ The Adviser emphasizes the unrestricted right of the client to specify investment objectives, guidelines, and/or conditions on the overall management of their account. The Adviser's standard investment process begins with reviewing applicable state statutes, investment policy, and permitted investment language provided by the client.</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. No associated person of the Firm shall prefer his or her own interest to that of the advisory client.</li> <li>▪ The Adviser and its associated persons generally may not purchase and sell securities being considered for, or held by client accounts without pre-clearance of the Firm's Compliance Officer. Moreover, investment personnel may be subject to a blackout period from trading in such securities.</li> <li>▪ The Adviser and its employees generally may not participate in private placements or initial public offerings (IPOs) without pre-clearance from the Firm's Compliance Officer.</li> <li>▪ The Firm 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 the Firm, associated persons of the Firm, and related entities. The Adviser's investment advisory representatives will review these records on a regular basis.</li> <li>▪ Any individual not in observance of the above may be subject to termination.</li> </ul> <p>In accordance with Section 204A-1 of the Investment Advisers Act of 1940 or similar State statutes and rules, the Adviser also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Adviser or any person associated with the Firm. If a client or a potential client wishes to review Adviser's Code of Ethics in its entirety, a copy will be provided promptly upon request.</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:  
**Nikulski Financial, Inc.**

SEC File Number:  
801-

Date:  
09/2010

(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: <b>Nikulski Financial, Inc.</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	

**Privacy Statement**

The Adviser is committed to safeguarding the confidential information of its clients and holds all personal information provided to it in the strictest confidence. These records include all personal information that the Adviser collects from its clients or receives from other firms in connection with any of the financial services they provide. The Adviser also requires other firms with whom they deal to restrict the use of client's information. The Adviser's Privacy Policy is available upon client's engagement of the firm's services or by prior request of the clients.

**Insider Trading**

In accordance with Section 204A of the Investment Advisors Act of 1940 or similar State statutes and rules, the Adviser also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Adviser.

**Proxy Voting**

The Adviser does not vote client proxies. However, money managers selected by the Adviser may vote proxies for Clients. Therefore, except in the event a money manager votes proxies, Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Therefore (except for proxies that may be voted by a money manager), the Adviser and/or the client shall instruct the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

**Changes in Privacy Policy**

The Adviser may modify the policy at any time. The Adviser will notify its current Clients of any modifications.

**Questions**

Please contact Brian Nikulski, President and Chief Compliance Officer, if you have any questions about this Schedule F narrative at (563) 344-0118.

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