

Form ADV Part 2A
Investment Advisor Brochure
Keith Kelvin Anderson

Cover Page

Name of Registered Investment Advisor	Keith Kelvin Anderson
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Date of Last Revision	January 1, 2011

This Form ADV Part 2A (Investment Advisor Brochure) gives information about the investment advisor and its business for the use of clients and prospective clients. If you have any questions about the contents of this brochure, please contact me using one of the methods listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of skill or training.

Additional information about our firm is available on the SEC's website at: www.adviserinfo.sec.gov.

Material Changes

Material changes to the ADV Brochure will be provided as a separate document to clients who have received previous versions of brochure.

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Advisory Business

Advisory Firm

Keith K. Anderson, the owner, has been providing investment advisory services since 1996.

Advisory Services

Keith K. Anderson provides investment advisory services based on:

- . 80 years of financial market data
- . Nobel Prize-winning economic research
- . Studies of investor behavior
- . Construction of an investment portfolio tailored to each investor's goals and needs.

As of February 18, 2011, Keith K. Anderson has \$54 million of assets under management on a non-discretionary basis.

Services are based on the individual needs of the client. An initial interview and data gathering questionnaire is undertaken to determine the client's financial situation and investment objectives. Using the client's financial information, recommendations will be made to reflect client's individual needs and objectives. Recommendations will allocate portions of client's account assets to various classes according to historical and projected risks and rates of return. Client will have the opportunity to accept or reject any recommendations.

Quarterly, Keith K. Anderson reviews all client accounts. It is the client's responsibility to notify Keith K. Anderson at any time there are changes. Clients may call in at any time during normal business hours to discuss the client's account, financial situation, or investment needs. Clients will receive from the custodian timely confirmations and monthly statements containing a description of all transactions and all account activity. The client will retain rights of ownership of all securities and funds in the account to the same extent as if the client held the securities and funds outside the program. In addition to custodial statements, Keith K. Anderson reports quarterly to the client.

Fees and Compensation

Fees for investing are computed at an annualized percentage of assets under management.

Loring Ward administration and reporting fees schedule

In calculating and collecting Loring Ward's administration and reporting fees in the client's account, Loring Ward will determine the applicable rate of payment at the beginning of each calendar quarter based on the total value of assets in client's account at the end of the preceding quarter, less amounts invested in the SA Funds, multiplied by one quarter of the applicable per-cent in the chart below:

		per annum	per quarter
For accounts valued from	\$ 0 to \$250,000	0.80%	0.200%
For accounts valued from	\$ 250,000 to \$499,999	0.75%	0.188%
For accounts valued from	\$ 500,000 to \$999,999	0.40%	0.100%
For accounts valued from	\$1,000,000 to \$1,999,999	0.35%	0.088%
For accounts valued from	\$2,000,000 to \$4,999,999	0.30%	0.075%
For accounts valued from	\$5,000,000 and above	0.25%	0.063%

Keith K. Anderson's advisory fees

Advisory fees are calculated and billed at the beginning of each calendar quarter based on the total value of client's account at the end of the preceding quarter. Loring Ward will calculate, collect, and distribute quarterly advisory fees according to the following blended fee schedule (including New Mexico Gross Receipts tax, where applicable, currently .081875):

	per annum	per quarter
First \$ 250,000.	1.081875%	0.270%
Then from \$ 250,000 to \$ 500,000.	0.54094%	0.135%
Then from \$ 500,000 to \$1,000,000.	0.43275%	0.108%
Then from \$1,000,000 to \$2,000,000.	0.32456%	0.081%
Then from \$2,000,000 and above	0.21637%	0.054%

These fees are for advisory services only and do not include any transaction fees, which may be charged separately by the custodial firm. Mutual fund expense ratios will be itemized in their prospectus.

The first payment is due and payable upon execution of the Agreement, and will be assessed pro-rata in the event the agreement is executed other than the first day of the new calendar quarter.

The client will authorize the custodian holding client funds and securities to deduct Loring Ward and advisory fees direct from the client account in accordance with the above schedules. The custodian and Keith K. Anderson will provide periodic account statements to the client. Such statements will reflect all fee withdrawals. It is the client's responsibility to verify the accuracy of the fee calculation.

Fees are not negotiable.

Services will continue until either party terminates the Agreement on written notice. If termination occurs prior to the end of a calendar quarter, a pro-rata refund of unearned fees will be made to the client.

The Agreement contains an arbitration clause. To the extent permitted by law, any controversy or claim that may arise among client, Keith K. Anderson, Loring Ward or any of their affiliates, concerning any transaction arising out of or relating to client's account, or the construction, performance, or breach of the agreement, whether entered into prior to, on, or subsequent to the date of the Agreement, shall be submitted to arbitration. The Agreement provides the complete detail of the arbitration clause.

Keith K. Anderson may perform other specific investment advisory services as requested by a client for a fee of \$150 per hour not to exceed a maximum number of hours as agreed by the client. The fee is half payable upon signing an agreement and the balance upon delivery of the findings. The fee is negotiable.

Performance-Based Fees And Side-By-Side Management

Keith K. Anderson does not charge performance-based fees.

Types of Clients

Keith K. Anderson provides advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and business entities.

Generally the minimum account size is \$1,000,000.

Methods of Analysis, Investment Strategies, and Risk of Loss

Analysis utilized includes fundamental and technical. Asset allocation strategies are used for portfolio management. By its nature, investing looks to the long-term. After the client's short-term cash needs and emergency fund is evaluated, investment strategies are designed to help the client achieve his or her financial goals. Casualty insurance and long-term care insurance are discussed only at the client's request, and would be provided by an outside insurance firm.

While there is risk in all investments, some carry a greater degree of risk or higher costs. There is no guarantee that the investment strategy selected for the client will result in the client's goals being met, nor is there any guarantee of profit or protection from loss. Clients should read the prospectus in full.

Disciplinary Information

An investment advisor must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of its management personnel. Keith K. Anderson does not have any disclosure items.

Other Financial Industry Activities and Affiliations

Keith K. Anderson retains an independent third-party account administrator (LWI Financial Inc. or "LWIF") that performs certain services such as account administration, portfolio allocation analysis, asset-class investment strategy, back-office fulfillment, report and statement production, and fee debiting. Such services are paid directly through advisory fees billed to the client or are indirectly paid by Keith K. Anderson. LWIF is an investment adviser registered with the Securities and Exchange Commission.

LWIF may also sponsor educational seminars for the benefit of Keith K. Anderson and its clients. Such educational seminars provide Keith K. Anderson with access to information and ideas regarding practice development, client servicing, investment strategy, relationship management and financial planning. Attendance expenses associated with such educational seminars may be paid or reimbursed, either in whole or in part, by LWIF.

Keith K. Anderson may recommend, where appropriate, that client invest in shares of the SA Funds – Investment Trust (the "SA Funds"), a family of nine asset class mutual funds advised, managed and administrated by LWIF. Fees are not charged directly upon investments in the SA Funds. LWIF receives certain fees and expenses directly from the SA Funds for its services as disclosed in that Fund's prospectus.

Keith K. Anderson may execute transactions through a broker-dealer, Loring Ward Securities Inc. ("LWSI"), that is affiliated and under common ownership with LWIF. LWSI is a securities broker-dealer

and a member of the Financial Industry Regulatory Authority (“FINRA”) that introduces all transactions to its correspondent clearing firm, Pershing LLC, on a fully-disclosed basis. Keith K. Anderson or client may incur additional brokerage commissions, ticket charges or other similar expenses that are collected by LWSI, or another broker-dealer and/or custodian of record.

Code of Ethics, Participation or Interest In Client Transactions, and Personal Trading

Code of Ethics

Keith K. Anderson maintains a Code of Ethics as part of Compliance Procedures. Clients may request a copy of the Code of Ethics.

Personal Trading

Investments will only be made in mutual funds for a client as approved in writing by the client. The custodian will purchase these mutual funds at the day’s closing market price. Keith K. Anderson’s personal investments will follow the same program as that of all clients. Occasionally he will purchase small amounts of individual securities for his own account.

Brokerage Practices

Keith K. Anderson recommends Charles Schwab & Co., Inc. to the client due to Schwab’s high service standards and reasonable fees. Keith K. Anderson receives nothing of value from Schwab. Client may choose any broker acceptable to Loring Ward.

Review of Accounts

Keith K. Anderson reviews accounts once per quarter and sends a written quarterly performance report to each client.

Client Referrals & Other Compensation

Keith K. Anderson neither receives nor gives compensation for client referrals.

Custody

Keith K. Anderson is deemed to have custody of client funds solely because of the fee deduction authority granted by the client in the investment advisory agreement.

Clients will receive account statements monthly from the custodian. Client is urged to compare custodial account statements against statements prepared by Keith K. Anderson for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of client’s account.

Investment Discretion

Keith K. Anderson does not have discretion over any client accounts. A limited power of attorney will be limited to the power of executing trades on a non-discretionary basis in accordance with written instructions provided by client.

Keith K. Anderson will not have authority to withdraw funds or to take custody of client funds or securities, other than under the terms of the fee deduction clause in the agreement with the client.

The client will designate the broker to be used for trading and custodial services.

Voting Client Securities

Keith K. Anderson does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian.

Financial Information

An investment advisor must provide financial information if a threshold of fee prepayments is met; there is a financial condition likely to impair the ability to meet contractual commitments; or, a bankruptcy within the past ten years. Keith K. Anderson does not have any disclosure items in this section.

Requirements for State Registered Advisors

Keith K. Anderson

University of Washington B. S. Mechanical Engineering 1961
 M. S. Engineering 1967

Registered Investment Adviser 1996