

Heacock & Jones Financial Services, Inc.

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FORM ADV PART 2 BROCHURE

This brochure provides information about the qualifications and business practices of Heacock & Jones Financial Services, Inc. If you have any questions about the contents of this brochure, please contact us at 563-585-1400 or 800-498-3403. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Heacock & Jones Financial Services, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Heacock & Jones Financial Services, Inc. is 115762.

Heacock & Jones Financial Services, Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Summary of Material Changes

On July 28, 2010, the United States Securities and Exchange Commission published "Amendments to Form ADV" which amends the disclosure document that we provide to clients as required by SEC Rules. This brochure dated March 31, 2011 is a new document prepared according to the SEC's new requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require. In the future, this summary will discuss only specific changes made from the previous year's brochure. The only changes from the 12-31-2010 Heacock & Jones Form ADV Part 2 Brochure:

Section 10 – Disciplinary Information was updated to remove the following expired item:

Employment dispute resolution dated January 10, 2001.

Since this is a major format change and new content has been included, we recommend that clients and prospective clients review the entire brochure and its supplements.

We will further provide you with a new Brochure, free of charge, as necessary based on changes or new information, at any time. Currently, our Brochure may be requested, free of charge, by contacting Sharon Kluesner at 563-585-1400 or 800-498-3403 or by e-mail at skluesner@heacockjones.com.

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Advisory Business

Form ADV Part 2A, Item 4

Heacock & Jones Financial Services, Inc. (Heacock & Jones) is an investment advisory firm offering discretionary and non-discretionary portfolio management services to individuals, high net worth individuals, pension and profit sharing plans, corporations, and charitable/non-profit organizations.

Approximately 99% of our professional effort and billings are from providing clients with discretionary investment supervisory services. The remaining 1% of the firm's professional efforts and billings are from providing clients with non-discretionary investment services. Under a Discretionary Asset Management Agreement, continuous monitoring and investment advice is provided to the client, whereas in a Non-Discretionary Asset Management Agreement, review and advice is provided as requested.

Heacock & Jones offers advice on a variety of investment vehicles; including Equity Securities, both exchange listed and securities traded over the counter; Warrants; Corporate debt securities; Commercial Paper; Certificates of Deposit; Municipal Securities; Mutual Fund shares; United States Government securities; Options contracts on securities; Interests in partnerships investing in real estate or gas interests; or any other products that are appropriate for a client based on their individual needs and/or goals.

Heacock & Jones tailors advisory services to the client's individual needs. When a client is engaged, a detailed discovery session takes place resulting in the creation of an Investment Policy Statement. The Investment Policy Statement defines the client's objectives, constraints and asset allocation and provides detailed information about the client's income, risk tolerance, liquidity needs, investment horizon, tax considerations, legal considerations, insurance needs and any unique considerations. This information is then used to determine the appropriate investment portfolio design. The Investment Policy Statement is continuously revised as the client's needs and objectives change.

Heacock & Jones Financial Services, Inc. was founded in 2000 by Paul Heacock, who is the principal owner. Heacock & Jones is located in Dubuque, Iowa.

Assets Under Management as of December 31, 2010

Discretionary:	\$143,300,000
Non-Discretionary:	\$ 64,000
TOTALS	\$143,364,000

Fees and Compensation

Form ADV Part 2A, Item 5

Heacock & Jones Financial Services, Inc. offers investment advisory services for a percentage of assets under management, hourly charges or fixed fees. Approximately 99% of the advisory billings are from fees charged as a percentage of assets under management.

The fee schedule for Discretionary Asset Management Services is as follows:

Assets under Management	Maximum Annual Fees
Up to \$1,000,000	2.75%
\$1,000,001 - \$3,000,000	2.50%
\$3,000,001 and Up	Negotiable

For Non-Discretionary Asset Management Services, the fee schedule is as follows:

Assets under Management	Maximum Annual Fees
Up to \$5,000,000	1.00%
\$5,000,001 - \$10,000,000	0.75%
\$10,000,001 and Up	Negotiable

The fee schedules are used as guidelines. Fees are negotiable based on account size, service requirements and other factors. Once the fee is agreed upon, the fee is included as part of the client's Asset Management Agreement. Actual fees are generally less than the maximum fees listed in the schedules. Heacock & Jones' clients typically authorize the account custodian to debit their client account for the amount of Heacock & Jones investment advisory fee and to directly remit that management fee to Heacock & Jones. Clients can also choose to be billed for fees incurred, instead of deducting fees from their assets under management. All fees are charged quarterly, in arrears. No fees are prepaid.

Heacock & Jones does not have custody of the client's funds or securities. The client must provide written authorization to the custodian permitting Heacock & Jones to deduct the fees. Heacock & Jones provides the client and the custodian a billing statement showing the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner that the fee was calculated. The custodian sends the client a statement, at least quarterly, which details all amounts disbursed from the account including the amount of advisory fees paid directly to Heacock & Jones.

Clients will also incur fees charged by the account custodian that are separate from and are not paid to Heacock & Jones. The custodian will charge transaction fees/commissions for individual securities transactions. These fees typically range from \$8 to \$15 per transaction. The custodian will also charge a fee for the custody of any alternative investments such as Limited Partnerships and Real Estate Investment Trusts. Mutual fund and exchange traded fund companies charge internal fees and expenses. Certain mutual funds also impose fees if they are sold prior to their short term holding periods. These fees and expenses are detailed in each fund's prospectus. **(For more information on the custodian, see Item 12 – Brokerage Practices.)**

If a client terminates the relationship with Heacock & Jones during a quarterly billing period, the fee is pro-rated for the time the account was opened and is billed in the same manner as a normal quarterly fee would be billed based on the client's management agreement.

One investment advisor representative associated with Heacock & Jones is also a licensed representative of Foresters Equity Services, Inc. In this capacity, he may recommend those services to a client instead of Investment Advisory Services through Heacock & Jones. When making recommendations to clients, the investment advisor representative takes into consideration the client's investment objectives, level of discretion and account size to determine the suitability of providing services through either Heacock & Jones or Foresters Equity Services, Inc. The investment advisor offers investment products through Foresters Equity Services and will receive commission income on those sales. He will also receive 12-b-1 distribution fees from mutual funds that clients purchase through Foresters Equity Services, Inc. Brokerage commissions and 12-b-1 fees represent less than 50% of the investment advisor's total revenue. None of the revenue from brokerage commissions and 12-b-1 fees are shared with Heacock & Jones.

Clients always have the option to purchase investment products recommended by advisors for Heacock & Jones from other brokers or agents who are not affiliated with Heacock & Jones. If a client owns a specific product that is considered a brokerage product, it will be excluded from the Management Fees calculation. Clients are not charged both a commission and a Management Fee.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

Heacock & Jones does not base its fees on a share of capital gains or capital appreciation of assets or a percentage of the income earned. Fees are based on the market value of the assets.

Types of Clients

Form ADV Part 2A, Item 7

Heacock & Jones provides investment advice to different types of clients; including individuals, high net worth individuals, Pension & Profit Sharing Plans, Charitable Organizations and Corporations.

Although the guideline for minimum account relationships is set at \$250,000, referrals from existing clients are not declined. Referrals are an important part of how new business is developed.

All clients are required to enter into an Investment Management Agreement with Heacock & Jones prior to receiving any services.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

Heacock & Jones employs modern portfolio theory to construct investment portfolios that are suited to the client's goals and risk tolerance. The philosophy is to assist the client with the prudent allocation of their capital among the major asset classes including stocks, bonds and money market funds, while at the same time working to minimize the risk inherent when investing in the financial marketplace.

The bond portion of the investment accounts are designed with the intention of providing favorable sources of income while at the same time outperforming the common bond market benchmark, the Barclay's Aggregate Bond Index. Bond portfolios are typically diversified using a combination of individual bonds and bond funds which invest in government bonds, corporate bonds, preferred stocks and municipal bonds. The 2 primary risks associated with bond investments include interest rate risk, which is managed by increasing the duration of the bond maturities when interest rates are declining and reducing the duration of the bond maturities when interest rates are increasing. Secondly, credit risk is effectively managed by reducing the exposure to corporate credits when entering periods of economic uncertainty and increasing exposure to corporate credits when emerging from periods of economic uncertainty.

The stock portion of the investment accounts are designed with the intention of outperforming the common stock market benchmarks including the Wilshire 5000 and the Morgan Stanley Capital International Europe Australia Far East indexes (MSCI EAFE). Stock portfolios are typically diversified across the major asset classes including Large Company Growth funds, Large Company Value funds, Small Company Growth funds, Small Company Value funds and International funds.

Fixed Income Investment Style

The fixed income portion of an asset allocation is intended to produce any income needed and compound interest to contribute stability to the portfolio. Risks associated with a bond portfolio are managed by using techniques such as Duration to manage the interest rate risk and Convexity to manage prepayment and call risk. Credit risk is managed based on the expansion or contraction of economic growth. The bond portfolio design is typically made up of individual bond positions; however there may be occasions where bond funds are used to satisfy these needs.

Stock Investment Style

The stock portion is intended to create growth. Our style is to manage the risk and reward tradeoff between growth versus value, small companies versus large companies and international companies. The stock portfolio design is intended to gain exposure to each of the major stock asset classes. We have associations with national money managers who are specialists in each of their respective asset classes. We also compliment the national managers with the selection of exchange traded funds which emulate the returns of each asset class.

Risks

Heacock and Jones does not offer products or services that guarantee rates of return on investments for any time period to any client. Investing in securities involves risk that clients should be prepared to bear. Client accounts are subject to general market risk. The value of securities held in client accounts will tend to fluctuate in response to movements in the market.

Sources of Information

Our primary resource for the selection of securities is an intense in-house screening process involving fundamental, technical, charting and cyclical analysis. We utilize data obtained from many different sources including, but not limited to; financial newspapers and magazines, research materials prepared by ourselves and others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission and company press releases.

Disciplinary Information

Form ADV Part 2A, Item 9

No other disciplinary information is applicable to Heacock & Jones Financial Services, Inc.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Heacock & Jones and its management persons are not registered as a broker-dealer and do not have any applications pending to register as a broker-dealer.

Heacock & Jones and its management persons are not registered as and do not have any applications pending to be registered as futures commission merchants, commodity pool operators, commodity trading advisors. Heacock & Jones and its management persons do not have any associations with any of the foregoing entities.

As mentioned under **Item 5 – Fees & Compensation**, one investment advisor representative associated with Heacock & Jones, Douglas D. Koopmann is also a licensed representative of Foresters Equity Services, Inc. Heacock & Jones does not have a relationship with Foresters Equity Services, Inc.

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

Form ADV Part 2A, Item 11

Code of Ethics

Heacock & Jones developed a Code of Ethics in July of 2004, pursuant to the SEC Rule 204-A-1. The Advisers Act imposes a fiduciary duty on investment advisers. As a fiduciary, Heacock & Jones Financial Services, Inc. and its investment advisor representatives have a duty of utmost good faith to act solely in the best interest of their clients and make full and fair disclosure of all material facts, where the adviser's interest may conflict with the client's. This fiduciary duty is the core principal underlying our Code of Ethics, and represents the expected basis of all our dealings with clients. A copy of our Code of Ethics will be provided to clients upon request. All supervised persons at Heacock & Jones are required to acknowledge the terms of the Code of Ethics on an annual basis or as amended. You may request a copy by contacting Sharon Kluesner by phone at 563-585-1400 or by e-mail at skluesner@heacockjones.com.

Participation or Interest in Client Transactions

Related persons of Heacock & Jones maintain investment accounts and utilize investment advisory services of Heacock & Jones. Therefore, there are occasions when securities are bought or sold for the related persons accounts and client accounts. In these cases, trades are allocated among the accounts in a fair and equitable manner, avoiding any preferences to any individual accounts. Further, our Code of Ethics requires that we put client's interests ahead of our own. We maintain investment and trade allocation policies and procedures designed to address these conflicts of interest. Heacock & Jones and its employees do not recommend, buy or sell securities for client accounts in which they have a material financial interest.

Personal Trading

Heacock and Jones has also adopted a firm wide policy for monitoring the activity in all personal accounts of all related persons. All related persons are required to report their personal securities transactions and holdings to the Compliance Officer within 10 days of each calendar quarter end.

Brokerage Practices

Form ADV Part 2A, Item 12

Heacock & Jones does not maintain custody of client's assets, although we may be deemed to have custody if the client gives us authority to withdraw assets from their account (**Item 15 – Custody**). Client assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We require that clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. Heacock & Jones is independently owned and operated and is not affiliated with Schwab. Schwab will hold client assets in a brokerage account and buy and sell securities when we instruct them to. While Heacock & Jones requires clients to use Schwab as custodian/broker, clients will decide whether to do so and clients will open their accounts with Schwab by entering into an account agreement directly with them. We do not open the account for the clients, although we may assist clients in doing so. [If clients do not wish to place their assets with Schwab, then Heacock & Jones elects not to manage their account. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor.] Even though your account is maintained at Schwab, we are permitted to use other brokers to execute trades for your account as described below (see **Your Brokerage and Custody Costs**).

Selecting Brokers/Custodians

Heacock & Jones seeks to use a custodian/broker who will hold client assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. Heacock and Jones considers a wide range of factors, including, among others:

- ☐ Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- ☐ Capability to execute, clear, and settle trades (buy and sell securities for client accounts)
- ☐ Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- ☐ Breadth of available investment (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- ☐ Availability of investment research and tools that assist in making investment decisions
- ☐ Quality of services
- ☐ Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- ☐ Reputation, financial strength, and stability
- ☐ Prior service to us and other clients
- ☐ Availability of other products and services that benefit us, as discussed below (see **Products and Services Available to Us From Schwab**)

Your Brokerage and Custody Costs

Schwab, as custodian, generally does not charge separately for custody services but is compensated by charging commissions or other fees on trades that it executes or that settle into Schwab account. These commission rates generally run from \$8 - \$19.95 per individual security transaction. In addition to commissions, Schwab charges a flat dollar amount as a “prime broker” or “trade away” fee for each trades executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into a Schwab account. These fees are in addition to the commissions or other compensation paid to the executing broker-dealer. Because of this, in order to minimize trading costs, Schwab will execute most trades for client accounts. Heacock & Jones has determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see **How We Select Brokers/Custodians**).

Products and Services Available to Us From Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like Heacock & Jones. They provide clients with access to its institutional brokerage— trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help Heacock & Jones to manage or administer clients’ accounts, while others help Heacock & Jones to manage and grow their business. Schwab’s support services generally are available on an unsolicited basis and at no charge as long as the clients of Heacock & Jones collectively maintain a total of at least \$10 million of assets in accounts at Schwab. If clients of Heacock & Jones collectively have less than \$10 million in assets at Schwab, Schwab may charge Heacock & Jones a quarterly service fee of \$1,200. Following is a more detailed description of Schwab’s support services:

Services That Benefit Clients

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which Heacock & Jones might not otherwise have access or that would require a significantly higher minimum initial investment. Schwab’s services described in this paragraph benefit client accounts.

Services That May Not Directly Benefit Clients

Schwab also makes available other products and services that benefit Heacock & Jones but may not directly benefit client accounts. These products and services assist in managing and administering clients’ accounts. They include investment research, both Schwab’s own and that of third parties. Heacock & Jones may use this research to service all or a substantial number of clients’ accounts. In addition to investment research, Schwab also makes available software and other technology that:

- ☐ Provides access to client account data (such as duplicate trade confirmations and account statements)
- ☐ Facilitates trade execution and allocate aggregated trade orders for multiple client accounts
- ☐ Provides pricing and other market data
- ☐ Facilitates payment of Management fees from clients' accounts
- ☐ Assists with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us

Schwab also offers other services intended to help Heacock & Jones manage and further develop its business. These services include:

- ☐ Educational conferences and events
- ☐ Consulting on technology, compliance, legal, and business needs
- ☐ Publications and conferences on practice management and business succession
- ☐ Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

Heacock & Jones' Interest in Schwab's Services

The availability of these services from Schwab benefits Heacock & Jones because they do not have to produce or purchase them. Heacock & Jones does not have to pay for Schwab's services so long as clients of Heacock & Jones collectively keep a total of at least \$10 million of assets in accounts at Schwab. [Beyond that, these services are not contingent upon Heacock & Jones committing any specific amount of business to Schwab in trading commissions or assets in custody.] The \$10 million minimum may give Heacock & Jones an incentive to require that clients maintain their accounts with Schwab, based on their interest in receiving Schwab's services that benefit their business rather than based on client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. Heacock & Jones believes, however, that the selection of Schwab as custodian and broker is in the best interests of clients. Heacock & Jones selection is primarily supported by the scope, quality, and price of Schwab's services (see **How We Select Brokers/Custodians**) and not Schwab's services that benefit only Heacock and Jones. [Heacock & Jones has \$143,364,000 in client assets under management, and does not believe that requiring clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.]

Directed Brokerage

Heacock & Jones does not permit clients to choose a specific account custodian or to direct brokerage to a specific broker-dealer. Schwab is utilized as the broker-dealer for all transactions and the custodian for all cash and securities held in client accounts. All accounts at the custodian are opened and registered in the name of the client.

Allocation of Investment Opportunities

Heacock & Jones recognizes its duty as a fiduciary to allocate investment opportunities in a fair and equitable manner and not favor client accounts. In general, investment opportunities are made available to all clients that are eligible to participate and where such investment opportunities are deemed to be appropriate for the specific client. Heacock & Jones has established investment and trade aggregation and allocation policies to provide assurance that each client is treated in a fair and equitable manner over the long term and potential or actual conflicts of interest are adequately lessened.

Trade Aggregation & Allocation

Whenever practical, trades will be put in a single block order (aggregated) in an effort to obtain the best execution at the best price available. When orders are aggregated, the actual prices applicable to the aggregated orders are averaged and all participating accounts are deemed to have purchased or sold the security involved at that average price.

Portfolio Managers create each trade using an order management system and apply the trade to all client accounts as

appropriate. Heacock & Jones utilizes a rotational allocation system to allocate trades among client accounts based on a pre-determined order of priority so that each account receives a full allocation in order of priority until the entire order has been allocated. Heacock & Jones has in place policies and procedures to confirm that trade allocations are placed consistently and all clients are treated equitably. Advisors are required to document allocation decisions and obtain approval from the Chief Compliance Officer before deviating from the standard policy.

Cross Transactions

Heacock & Jones does not process cross transactions (trading between client accounts), unless such transactions are first approved by the Chief Compliance Officer.

Trade Errors

From time to time, an advisor of Heacock & Jones may make an error in submitting a trade order on behalf of clients. When this occurs, the advisor may place a correcting trade with Charles Schwab (the broker-dealer who has custody of client accounts).

- A. If an investment gain results from the correcting trade, the gain will remain in the client account unless the same error involved another client account that should have received the gain, it is not permissible for the client account to retain the gain, or the client decides to forego the gain (for example – due to tax reasons).
- B. If the gain does not remain in the client account, it is the policy of Charles Schwab to donate any gain of \$100 or more to charity.
- C. If a loss occurs greater than \$100, the loss is incurred by Heacock & Jones.
- D. Schwab will keep any gain or loss under \$100 (if not retained in the client account) to minimize and offset its administrative time and expense.
- E. Generally, if related trade errors result in both gains and losses in your account, they may be netted.

If a trade is allocated to an account incorrectly, the advisor will process a “cancel and re-bill” transaction to move the trade to the corrected account. In this type of correction, clients will receive a confirmation statement from Schwab showing the cancelled trade.

Review of Accounts

Form ADV Part 2A, Item 13

Client portfolios are reviewed no less often than quarterly and in most cases, monthly. Reviews are conducted by the Chief Investment Officer, Paul Heacock and designated management persons to confirm that account allocations are consist with each client's goals and objectives as defined in the client's Investment Policy Statement.

Reviews are also triggered by factors such as the general economy, market conditions, and changes in investment strategies or client circumstances. Clients may also request reviews at any time by phone, meeting or e-mail.

Portfolios containing individual securities are reviewed more often than monthly, as the Portfolio Managers implement decisions to buy or sell individual securities. When individual securities owned by multiple accounts are called or reach maturity, accounts are reviewed for replacement purchases.

Clients receive statements from Heacock & Jones on a monthly or quarterly basis. The statements are prepared using the Advent recordkeeping software, Axys. The reports typically include:

Portfolio Appraisal with Yield: This is an inventory of the client's investment holdings including cost basis and current market value.

Performance History: This is an Association for Investment Management and Research's (AIMR) Global Investment Performance Standards (GIPS) compliant return calculation.

Cash Ledger: This is a report that shows the cash activity in the account including interest, dividends, purchases, sales, deposits and withdrawals.

Clients also receive a statement on a monthly or quarterly basis from the account custodian.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

Heacock & Jones receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (**see Item 12 – Brokerage Practices**). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for clients.

Heacock & Jones may use the services of paid solicitors. An arrangement is currently in place with one solicitor. All clients referred by the solicitor are given a consultant's disclosure letter and an advisor's written disclosure statement. Full compliance with SEC Rule 206(f)-3 is maintained at all times.

Custody

Form ADV Part 2A, Item 15

Under government regulations, Heacock & Jones are deemed to have custody of client assets if, for example, clients authorize Heacock & Jones to instruct Schwab to deduct advisory fees directly from client accounts or if clients grant authority to Heacock & Jones to move money to another person's account. Besides these instances, Schwab maintains actual custody of client assets. Heacock & Jones does not have custody of client funds or securities.

All clients receive statements from the account custodian, as well as from Heacock & Jones. Heacock & Jones urges clients to review and compare the Heacock & Jones statements to those of the account custodian. The Heacock & Jones statement may differ from custodial statements slightly based on accrued interest reporting, valuation practices or reporting dates of non-mutual fund securities. Clients are encouraged to contact us with any questions regarding either statement.

Investment Discretion

Form ADV Part 2A, Item 16

Heacock & Jones offers Discretionary Asset Management as its primary investment advisory service. As part of the engagement of a client, a Discretionary Asset Management Agreement is prepared and signed by both the advisor and the client. If a client wishes any specific limitations be set on the account, they are noted in this agreement, in the Investment Policy Statement and in our Client Relationship Management software.

Voting Client Securities

Form ADV Part 2A, Item 17

Heacock and Jones has adopted Proxy Voting Policy and Procedures. Heacock and Jones votes proxies on behalf of clients for whom they have Discretionary Authority.

When no conflicts of interest are present, the votes are cast according to the recommendations of the management of the company issuing the proxy. If there is deemed to be a conflict of interest, the vote is reviewed by the Investment Committee. Any proxy issued with any vote that is out of the ordinary is also reviewed by the Investment Committee.

All votes are logged and a voting record for each proxy is maintained for a period of 5 years. Client may obtain a copy of our Proxy Voting Policy and Procedures by contacting Sharon Kluesner by phone at 563-585-1400 or by email at skluesner@heacockjones.com. Requests for information on how a specific proxy was voted can also be made by contacting Sharon Kluesner.

Clients with Non-Discretionary accounts can chose to vote their own proxies when their accounts are opened by choosing that election on their account application. Proxies for which Heacock & Jones does not have voting discretion are noted as such and are maintained with along with the voted proxies.

If at any time, a client wishes to change their election, they can do so by contacting Heacock & Jones. Clients are always encouraged to contact us with any questions they have regarding solicitations.

Financial Information

Form ADV Part 2A, Item 18

Heacock & Jones has no financial conditions which would impair its ability to meet contractual commitments to its clients.

Requirements for State-Registered Advisers

Form ADV Part 2A, Item 19

Heacock & Jones is not a State-Registered Adviser.