

**Part 2A of Form ADV: *Firm Brochure***

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This brochure provides information about the qualifications and business practices of Snider Advisors. If you have any questions about the contents of this brochure, please contact us at 214-220-0055 or [support@snideradvisors.com](mailto:support@snideradvisors.com). 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 Snider Advisors is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 120943.

## ITEM 2 MATERIAL CHANGES

The SEC adopted "Amendments to Form ADV" in July, 2010. This Firm Brochure, dated 12/31/2010, is our new disclosure document prepared according to the SEC's new requirements and rules. As you will see, this document is a narrative that is substantially different in form and content and includes more information than our previous document.

After our initial filing of this Brochure, this Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

You will receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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## ITEM 4    ADVISORY BUSINESS

Chronim Investments, Inc. is a SEC-registered investment adviser with its principal place of business located in Texas. Chronim Investments, Inc. began conducting business in 2002.

Listed below are the firm's principal shareholders. These are the individuals and/or entities controlling 25% or more of this company.

- Kimberly Ayn Snider, CEO
- James Anthony Hughes, CFO

Snider Advisors offers the following advisory services to our clients:

### **SNIDER METHOD CONSULTING SERVICES**

Our firm provides continuous advice to a client regarding the investment of client funds based on the Snider Method. We manage these accounts primarily on a non-discretionary basis. There are two levels of Consulting Services. Level 1 consists of periodic notices of events which may affect the trades called for by the method, answering questions from clients regarding the method in general or specific to their accounts, and assistance placing trades. Level 2 consists of all the Level 1 services plus determining all or substantially all of the trades to place in an account during a month. Level 2 may also include placing the trades on the client's behalf. We assume discretionary authority over the account for a limited period of time when a client makes such a request.

We gather data regarding a client's particular circumstances to determine if the Snider Method is a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. The Snider Method investments include:

- Exchange-listed securities
- Options contracts on securities
- United States governmental securities
- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

### **INDIVIDUAL ASSET MANAGEMENT**

Our firm provides non-continuous asset management of client funds based on the Snider Method. We gather data regarding a client's particular circumstances to determine if the Snider Method is a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis following the Snider Method. The method considers factors such as liquidity needs, income objectives, risk tolerances, and

tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Once the client's portfolio has been established, we perform the trades specified by the method each month.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Options contracts on securities
- United States governmental securities
- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

## **SEMINARS**

Snider Advisors conducts group educational workshops where clients learn the Snider Investment Method. The Snider Method is a long-term strategy designed to create income from your portfolio. It uses a combination of stock, options and cash, along with specific techniques applied in a specific sequence, to achieve these goals. We also offer an online version of the workshop.

Snider Advisors offers half-day and one-day workshops covering many aspects of financial planning. The courses are described as KiM-B-A courses and cover Introduction to Investments, Retirement Planning, Funding Healthcare, Converting your IRA to a Roth, Investing for Retirement, and Estate Planning. The Investing for Retirement course covers essentially the same material as the two-day live Snider Investment Method course with regards to the Snider Investment Method.

Snider Advisor also offers an on-demand course about 401(k) investing. The course offers advice on how to properly manage many aspects of your 401(k) plan. You can watch the course as many times as you want. You also receive an Excel workbook with interactive tools and access to help by email or telephone.

## **FINANCIAL PLANNING**

We provide financial planning services. Financial planning services vary based on the client's objectives and questions. The financial advisor may help the client with specific needs or perform an overall analysis. Clients who seek an overall analysis will receive a comprehensive evaluation of their current and future financial state by using client-furnished information and data. Specific financial planning needs may include, but are not limited to: investment advice, insurance consultations, benefits analysis, retirement planning, college education planning, tax planning, and estate planning.

Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. The financial advisor will make actionable recommendations for the client based on the results of the data gathering, research, and financial planning best practices. Clients pay an hourly fee for the time it takes to meet, research, and prepare recommendations.

Financial planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All financial plans are dynamic and should be revisited periodically to track progress and make changes as necessary. The client is responsible for initiating subsequent meetings and activities.

### **SECURITIES RATING SERVICES**

Snider Advisors provides a securities rating service called Lattco. This service is used to trade securities in the Snider Method. We exclude securities from consideration based on fundamental data, credit scoring methods, and liquidity measures (for the stock and the options on the stock). Included securities are then ranked based on price, volatility, liquidity, and sector factors and presented to the client as investment recommendations. Subsequent investment recommendations regarding a particular security are determined by the algorithms of the Snider Method, which do not generally consider these factors after the initial Lattco recommendation.

### **AMOUNT OF MANAGED ASSETS**

As of 12/31/2010, we were actively managing \$85,419,579 of clients' assets on a discretionary basis.

## ITEM 5 FEES AND COMPENSATION

### INDIVIDUAL ASSET MANAGEMENT FEES

The annualized fee for Asset Management Services will be charged as a percentage of assets under management, according to the following schedule:

<b><u>Assets Under Management</u></b>	<b><u>Annual Fee</u></b>
Less than \$500,000	2.50%
\$500,000 - \$2,000,000	2.00%
\$2,000,000 - \$5,000,000	1.50%
More than \$5,000,000	1.00%

The minimum asset value for Asset Management Services is \$200,000. These fees are billed on a monthly basis, in arrears. The fees are based upon the asset value as of the end of the prior month as it appears on the brokerage statement. Clients receive an invoice for the fees. If the client has arranged to have fees deducted from the account, the trustee will receive a copy of the invoice and will pay the fee.

The fee for each month for all the accounts owned by one individual or one trust is subject to a maximum, which is the fee for the smallest asset value for the next level. For example, accounts under \$500,000 will pay 1/12 of 2.5%, but not more than 1/12 of 2.0% of \$500,000. All the accounts owned by a client, spouse and minor children are aggregated to determine the fee percentage. Fees are prorated by days in any period in which the services terminate. Upon termination, any unpaid fees are due.

Snider Advisors offers a partial rebate against asset management fees for clients who purchase the Snider Investment Method™ online course. Snider Advisors' advisory fees are not negotiable.

### SNIDER METHOD CONSULTING SERVICES FEES

The monthly fee for Snider Method Level 1 Consulting Services is \$10 charged at the beginning of the month. The fee for Level 2 Consulting Services is the same as the fee for Asset Management Services. A reduced fee of \$90 is charged for Level 2 consulting services for a maximum of six months during the first twelve months, and three months in each subsequent twelve month period. The fee for Lattco is \$30 in any month in which the client uses the service, regardless of how many times the service is used during the month. All fees other than the \$10 fee are charged at the end of the month.

There is no minimum asset value for Snider Method Consulting Services, since clients are trading their own accounts. However, we recommend a minimum investment of \$25,000.

Snider Advisors' consulting fees are not negotiable, except for the special reduced Level 2 monthly fee. We may elect to apply the reduced fee more frequently than described above at our own discretion.

### SEMINAR FEES

There is a one-time fee for the workshop (\$2,475 for the live, two-day Snider Investment Method workshop and \$2,475 for the online version, and fees varying from \$247 to \$2,500 for the KiM-B-A courses). There is currently no separate charge for the on-demand 401(k) course. Some of our live workshops may be offered on a user-determined-fee basis. If you

attend one of these workshops, you will decide how much you think the workshop is worth. Any discounts and/or promotional offers on any of our services are offered at our discretion. We may also reduce or waive fees for workshop attendance for family and friends of our employees or certain vendors and associates of Snider Advisors.

There is a deposit payable when the client first registers for the class. The balance is due the day before the workshop. You may request a refund for any reason within 90 days of attending a seminar. Deposits are fully refundable for any reason.

### **FINANCIAL PLANNING FEES**

Snider Advisors' Financial Planning fee will be determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Financial Planning fees are calculated and charged on an hourly basis, ranging from \$125 to \$200 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship.

The client will be billed in arrears based on actual hours provided.

### **GENERAL INFORMATION**

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. As disclosed above, the only fee paid in advance is the \$10 monthly consulting fee. Upon termination, this monthly fee is not prorated and no refund is provided for the balance of the month. At termination of any other services, the accrued, unpaid fees are due and payable. In calculating asset management fees, we will pro rate the final fee according to the number of days remaining in the billing period. The advisory relationship will automatically terminate 14 days after attending a seminar unless additional services are requested.

***ETF Fees:*** All fees paid to Snider Advisors for investment advisory services are separate and distinct from the fees and expenses charged by ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in an ETF directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the ETFs and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

***Additional Fees and Expenses:*** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer or custodian. Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

***Grandfathering of Minimum Account Requirements:*** Pre-existing advisory clients are subject to Snider Advisors' minimum account requirements and advisory fees in effect at the



time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

**ERISA Accounts:** Snider Advisors is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Snider Advisors may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Snider Advisors' advisory fees.

**Advisory Fees in General:** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$500 more than six months in advance of services rendered.

## ITEM 6 PERFORMANCE-BASED FEES

Snider Advisors does not charge performance-based fees.

## ITEM 7 TYPES OF CLIENTS

Snider Advisors provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- Corporations, partnerships and other entities
- High net worth individuals

As previously disclosed in Item 5, our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

## ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

**Fundamental Analysis.** The Snider Method attempts to identify fundamentally sound companies with high price volatility. To do this, we use credit scoring techniques which use fundamental data.

This fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

**Asset Allocation.** Our proprietary stock screener, Lattco, is able to diversify positions among various industry sectors. The Snider Method attempts to balance cash and positions in securities to produce stable income.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

### INVESTMENT STRATEGIES

We use the Snider Method investment strategy. This strategy combines stock purchases, option sales, and cash balances with the objective of providing current income.

**Long-term purchases.** We purchase securities we may potentially hold for long periods of time. The risks of holding securities for long periods of time is the stock may decline in price or go bankrupt.

**Short-term purchases.** We purchase securities we may potentially hold for short periods of time. The risks of holding securities for short periods of time and replacing them with other stocks is higher transactions costs.

**Margin transactions.** The Snider Method occasionally requires you to purchase stocks with money borrowed from your broker. This allows you to purchase more stock than you would be able to with your available cash. You must pay margin interest on the amount of money borrowed from your broker.

A risk in margin trading is that, in volatile markets, securities prices can fall very quickly. If the value of the securities in your account minus what you owe the broker falls below a certain level, the broker will issue a "margin call", and you will be required to sell your position in the

security purchased on margin or add more cash to the account. In some circumstances, you may lose more money than you originally invested.

**Option writing.** We use options as part of our investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives the buyer the right to buy an asset at a certain price within a specific period of time in exchange for a premium paid to the seller. We typically sell calls as part of our investment strategy.
- A put gives us the buyer the right to sell an asset at a certain price within a specific period of time in exchange for a premium paid to the seller. We typically sell puts as part of our investment strategy.

We use covered calls and cash-secured puts, in which we sell options on securities we own (or have earmarked cash to buy). In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price.

Some of the risks of this strategy are: 1) We own the stock, so if the price declines we have an unrealized loss. 2) We give away some of the potential price increase because we agreed to sell the security at the option strike price. 3) We own the stock, so if the company goes bankrupt we have a realized loss.

**Risk of Loss.** Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

## ITEM 9     DISCIPLINARY INFORMATION

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

## ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

## ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Snider Advisors and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Snider Advisors' Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [support@snideradvisors.com](mailto:support@snideradvisors.com), or by calling us at 214-220-0055.

Snider Advisors and individuals associated with our firm are prohibited from engaging in principal transactions and agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in securities which may also be recommended to a client.

It is the policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm are licensed as an insurance agent/broker of various insurance companies. Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.



## ITEM 12 BROKERAGE PRACTICES

Snider Advisors does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

Snider Advisors does not have the authority to determine the broker/dealer to be used by our clients or commission rates paid by our clients without obtaining specific client consent. However, we do suggest broker(s) to our clients and we do require managed accounts be opened at our recommended broker/dealer(s).

The factors we consider when recommending broker/dealer(s) to clients include financial strength, reputation, execution, pricing, research, and service. Commission rates for recommended broker(s) are generally considered discounted from customary retail rates, but may be higher or lower than those charged by other broker/dealer(s). We will only establish accounts with broker/dealer(s) that provide timely service and fair price. We chose to recommend a single broker because of the technology support we require, as well as, the necessity for us to be experts using the trading platform that the majority of our clients use.

Our Asset Management clients must open an account at brokersXpress, an affiliate of optionsXpress. We do not have the technological and operational infrastructure to accommodate client trading through other broker-dealers. We recommend, but do not require, consulting clients to open an account at optionsXpress.

Snider Advisors has entered into a written agreement in which it has received cash and an economic benefit from a non-client in connection with giving advice to clients. More specifically, on January 31, 2008, Snider Advisors entered into a Loan and Security Agreement with optionsXpress. This agreement provides Snider Advisors with an initial loan and an option to obtain a second loan. Snider Advisors is required to pay the loan in full on or before the Maturity Date of December 31, 2011.

For each new account that Snider Advisors refers to optionsXpress or brokersXpress, Snider Advisors receives a credit which is applied against the loan. While the loan remains outstanding, the credit will be applied against the loan balance. After the loan is paid in full, optionsXpress may choose, in its sole discretion, to continue providing Snider Advisors with a credit to be paid in cash on a monthly basis. Clients should be aware that the direct or indirect receipt of payments from optionsXpress creates a material conflict of interest between us and our clients.

As a fiduciary, Snider Advisors has an obligation to act in the best interest of its clients and to place its clients' interests before its own. Snider Advisors' receipt of the loan proceeds and credits from optionsXpress has created a situation whereby Snider Advisors is using its clients' accounts at optionsXpress to benefit itself financially because we receive a credit for each account you open with optionsXpress. Accordingly, Snider Advisors has compromised its ability to independently evaluate whether to recommend, or to keep, optionsXpress as the broker-dealer and custodian for its clients' assets. Snider Advisors does, however, have the responsibility as required by the Securities and Exchange Commission to regularly and frequently evaluate our recommendations of broker/dealers to ensure our clients are getting the Best Execution available.

Clients may contact Snider Advisors with any questions regarding its relationship with optionsXpress and the terms of the Agreement with optionsXpress.

Client transactions generally will be made independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine such orders to obtain best execution, better commission rates, or to allocate equitably among our clients differences in prices, commissions, or other transaction costs that might have been obtained if the orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among our clients pro rata to the purchase and sale orders placed for each client on any given day. The extent we aggregate client orders for the purchase or sale of securities are in accordance with the parameters set forth in SEC No-Action Letter, SMC Capital, Inc. We will not receive any additional compensation or remuneration as a result of the aggregation.

Consulting clients may decide to use a particular broker-dealer to execute some or all of their transactions. In that case, the client will have the sole responsibility for negotiating commission rates and other transaction costs with the broker/dealer. If a client selects a specific broker, we will not be required to effect any transaction through the specified broker if we reasonably believe that to do so may result in a breach of fiduciary duties. We will not seek better execution services or prices from other broker-dealers or be able to batch client transactions for execution through other broker-dealers with orders for other accounts managed by Snider Advisors. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

## ITEM 13 REVIEW OF ACCOUNTS

### ASSET MANAGEMENT SERVICES

**REVIEWS:** While the underlying securities within Asset Management Services accounts are continually monitored, these accounts are reviewed monthly. Accounts are reviewed in the context of the Snider Method.

These accounts are reviewed by Jesse Anderson, the Chief Investment Officer of Snider Advisors.

**REPORTS:** In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide monthly reports summarizing account performance.

### SNIDER METHOD CONSULTING SERVICES

**REVIEWS:** Accounts are not reviewed for clients who use Consulting Services, since these clients are primarily responsible for trading their own accounts using the methods taught in our seminars. Snider Advisors personnel are available to review account at the request of the client.

**REPORTS:** Clients will typically receive monthly statements and confirmations of transactions from their broker-dealer. Snider Advisors will not provide additional reports.

### FINANCIAL PLANNING SERVICES

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

**REPORTS:** Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

## ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

Snider Advisors does not engage solicitors, nor do we pay related or non-related persons for referring potential clients to our firm.

### **OTHER COMPENSATION**

Our firm and/or our officers and representatives are eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies or other investment products that we recommend.

While we endeavor at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

We also have a financial incentive to recommend optionsXpress/brokersXpress to our clients. More details on this arrangement are under Item 12.

## ITEM 15 CUSTODY

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Our firm does not have actual or constructive custody of client accounts.

## ITEM 16 INVESTMENT DISCRETION

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm. They may not limit this authority.

Clients may hire us to provide nondiscretionary consulting services, in which case we place trades in a client's account only if specifically requested by the client. Clients may also request that we perform the monthly trades specified by the Snider Method if they are unable to access the market when required to do so. These Vacation Trade requests trigger a short window of time in which we have discretionary authority to place trades in their accounts.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm. They may not limit this authority.

## ITEM 17 VOTING CLIENT SECURITIES

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, 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. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

## ITEM 18 FINANCIAL INFORMATION

Snider Advisors has no additional no financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Snider Advisors has not been the subject of a bankruptcy petition at any time.