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March 28, 2011

FORM ADV PART 2A. BROCHURE

This brochure provides information about the qualifications and business practices of Financial Educational Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 516-280-8400. 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 Financial Educational Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Financial Educational Advisors, LLC is 122772.

Financial Educational Advisors, LLC 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.

Item 2: Material Changes: None.

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Advisory Business

Form ADV Part 2A, Item 4

Financial Educational Advisors, LLC's registration was granted by the U.S. Securities and Exchange Commission on May 2, 2007. Dean Michael Giella (CRD Number 1420362) is Managing Member and Chief Compliance Officer of the firm. Mr. Giella is one hundred (100%) percent equity owner of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries who have any ownership interest in the firm. The firm manages each client's portfolio on an individualized basis. Clients may impose restrictions on their accounts. The firm does not participate in wrap programs. As of March 31, 2010, the firm managed assets on a discretionary basis in the amount of \$21,988,000, representing 145 accounts.

Prior to engaging Registrant to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with Registrant setting forth the terms and conditions under which Registrant shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian. Both Registrant's *Investment Advisory Agreement* and the custodial/clearing agreement, shall authorize the custodian to debit the account for the amount of the Registrant's investment management fee and to directly remit that management fee to the Registrant in accordance with required SEC procedures. The *Investment Advisory Agreement* between the Registrant and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, the Registrant shall refund to the client the pro-rated remaining balance (if any) of Registrant's quarterly investment management fee.

FINANCIAL PLANNING

To the extent it is requested to do so, Registrant may provide its clients with financial planning and consultation services (including tax planning, tax preparation and other non-investment related matters). Registrant will charge a fee (fixed fee and/or hourly) for these services. Registrant's financial planning fees are negotiable, but generally range from \$1,000 to \$5,000 on a fixed fee basis and \$100 to \$250 on an hourly basis, depending upon the level and scope of the services required and the professional rendering the service(s). Financial planning services may include investment review, retirement planning, tax planning, college planning, and/or long term care issues. Prior to engaging the Registrant to provide financial planning and/or consultation services, the client will generally (*i.e.*, depending upon the level and/or scope of services to be provided) be required to enter into a *Financial Planning Agreement* with Registrant setting forth the terms and conditions of the engagement, and describing the scope of the services to be provided. In the event the client terminates Registrant's financial planning and/or consultation services, the balance of Registrant's fee, if any, shall be refunded to the client. In performing its services, Registrant 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. If requested by the client, Registrant shall recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant. Clients are encouraged to renew Registrant's financial planning services on an annual basis for the purpose of reviewing/updating Registrant's previous recommendations and/or services. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

INVESTMENT MANAGEMENT

Registrant offers clients investment management services on a fee-only basis. Registrant shall charge an annual investment management fee based upon a percentage of the market value of the assets being managed by

Registrant.

Registrant may also provide non-discretionary services to certain of its qualified clients relative to prospective investments in private placement limited partnerships offered in accordance with Regulation D (*i.e.*, Rules Governing the Limited Offer and Sale of Securities without Registration under the Securities Act of 1933). Registrant's service in this regard is limited to advice only, and Registrant does not, nor does its Managing Member, participate in any such partnerships as a sponsor, promoter or salesperson.

Independent Manager(s)

In addition, for those clients that require an enhanced and/or specialized level of investment management services, Registrant shall also recommend that certain clients authorize the Registrant to allocate, on a discretionary basis, the active discretionary management of a portion of their assets by and/or among certain independent investment manager[s] to be selected by the Registrant (the "*Independent Manager[s]*"), based upon the stated investment objectives of the client. The Registrant shall continue to render ongoing and continuous advisory services to the client relative to the monitoring and review of account performance, client investment objectives, and asset allocation, for which Registrant shall receive an annual advisory fee which is based upon a percentage of the market value of the assets being managed by the designated *Independent Manager[s]* in accordance with the aforementioned fee schedule. Factors which the Registrant shall consider in recommending *Independent Manager[s]* include the client's stated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research. The Registrant generally has the authority to determine the broker-dealer/custodian to be used by the designated *Independent Manager[s]* relative to those accounts for which the *Independent Manager[s]* provide discretionary investment management services for Registrant's clients. The investment management fees charged by the designated *Independent Manager[s]*, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are exclusive of, and in addition to, Registrant's ongoing investment advisory fee.

Fees and Compensation

Form ADV Part 2A, Item 5

Registrant's financial planning fees are negotiable, but generally range from \$1,000 to \$5,000 on a fixed fee basis and \$100 to \$250 on an hourly basis, depending upon the level and scope of the services required and the professional rendering the service(s).

The investment management fee charged shall vary between negotiable and 1.50% depending upon the market value of assets under management as follows:

<u>Assets Under Management</u>	<u>Annual Fee</u>
Initial \$25,000 – \$1,000,000	1 %
Over 1,000,000	Negotiable

Registrant's annual investment management fee shall be prorated and paid quarterly, in advance, based upon the market value of the assets under management on March 31st (for the quarter beginning April 1), June 30th (for the quarter beginning July 1), September 30th (for the quarter beginning October 1), and December 31st (for the quarter beginning January 1) of each calendar year. No increase in the annual fee shall be effective without prior written notification to the client. Registrant generally does not require an account minimum for investment management services. Registrant, in its sole discretion, may charge a lesser management fee based upon certain criteria (*i.e.*, existing financial planning client, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

Registrant's quarterly client fees are charged at the beginning of every quarter in advance. When required, refunds are reimbursed to the client based on a pro-rata share of a 90-day quarter.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

None.

Types of Clients

Form ADV Part 2A, Item 7

Individuals, pension plans, profit sharing plans, trusts, charitable organizations, corporations and other business entities.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

Registrant continuously evaluates the client's investments to determine whether they harmonize with his/her/its stated financial objectives. Registrant designs and proposes an investment portfolio to assist its clients in attaining future financial security. The investment philosophy of the Registrant is to implement the principles of the Modern Portfolio Theory of Asset Allocation. A diversified portfolio seeks to mitigate the investment risk associated with particular asset classes. Using asset classes which tend to perform differently in similar markets can act to limit the overall risk of a portfolio.

The Registrant constructs models which have differing degrees of risk (standard deviation). The appropriate model for each client will differ based on many factors. Some of the factors involved are: investment horizon, client's risk tolerance, age, or current financial situation. In certain special situations, a client specific model may be created.

The investment manager selections for each asset class are chosen after thorough evaluation by the Registrant's Investment Committee. Each current or potential money manager presented to the committee must meet certain requirements. Investment managers must have, at a minimum, a five year history with that asset class. The standard deviation (risk) must be within an acceptable range for its asset class. The historical returns must also fall within an acceptable range. The fees charged by the management firm must also be within acceptable parameters for the asset class. The investment firm must also maintain the investment style which it has been chosen to represent within the portfolio.

Financial planning involves a long-term perspective. Subsequent to reviewing a client's short-term cash needs, emergency fund and insurance coverage, Registrant will design and propose an investment strategy to assist the client in achieving his/her/its long-term financial goals.

Investing in securities carries a risk of loss which the client must be prepared to bear.

Disciplinary Information

Form ADV Part 2A, Item 9

None.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Registrant's Managing Member, in his individual capacity, is also a licensed insurance agent, and may recommend the purchase of insurance products on a commission basis. Registrant's Managing Member devotes approximately twenty five percent (25%) of his time to securities and life insurance commission business. The commissions paid to the Registrant's Managing Member for securities and life insurance business are separate and apart from Registrant's investment management fee discussed elsewhere in this narrative.

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

Form ADV Part 2A, Item 11

The firm has implemented an investment policy relative to personal securities transactions. This investment policy is part of the firm's overall Code of Ethics that serves to establish a standard of business conduct for all of the firm's associated persons, which is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available to clients and prospective clients upon request.

From time to time, the Firm may deal for its own account. Whenever the Firm and a client transact business in the same product and at the same point in time, if the two transactions are made at different terms, the Firm will ensure that the client receives the more favorable financial result, and will accept for its own account the less favorable financial result.

The firm's Code of Ethics is monitored and reviewed on a regular basis by the firm's chief compliance officer or designated representative. All of the firm's associated persons must acknowledge the terms of the Code of Ethics annually, or as amended. Issues and procedural mandates concerning personal securities transactions and other ethical issues are memorialized in the firm's Code of Ethics. The advisor considers it a vital aspect of his client relations to diligently provide his services in an ethically exemplary and accountable manner at the core of which is the spot to place clients' interests before his own. A copy of the firm's Code of Ethics will be provided to any client or prospective client upon request in accordance with SEC Rule 204A-1.

In accordance with Section 204A of the Investment Advisers Act of 1940, the Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Registrant or any person associated with the Registrant.

Brokerage Practices

Form ADV Part 2A, Item 12

To the extent that the client requests that the Registrant recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that direct the Registrant to use a specific broker-dealer/custodian), Registrant generally recommends that investment management accounts be maintained at Fidelity Institutional Wealth Services ("FIWS"). 403(b)7 accounts are maintained at Fidelity Tax Exempt Services Co ("FITSCO"), an approved vendor within the 403(b) plan of school districts the Registrant conducts business.

Registrant allocates investment management assets of its client accounts on a discretionary basis. As discussed above, unless the client directs or the circumstances presented require otherwise, Registrant shall generally recommend that *Fidelity IWS* or *FITSCO* serve as the broker-dealer/custodian for client assets. *Fidelity IWS* charges commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity/debt securities transactions). In addition to Registrant's investment management fee, brokerage commissions and/or transaction fees, the client will also incur, relative to all mutual fund purchases, charges imposed at the mutual fund level (e.g. management fees and other fund expenses). When beneficial to the client, transactions may be effected through broker-dealers with whom Registrant and/or the client have entered into arrangements for prime brokerage clearing services.

Factors which the Registrant considers in recommending a particular broker-dealer/custodian to clients include financial strength, reputation, execution, pricing, research, reporting and service. In return for effecting securities transactions through a designated broker-dealer/custodian, Registrant may receive certain investment research products and/or services which assist the Registrant in its investment decision-making process for the client pursuant to Section 28(e) of the Securities Exchange Act of 1934 (generally referred to as a *soft dollar arrangement*). Investment research products and/or services received by Registrant may include, but are not limited to, analyses pertaining to specific securities, companies or sectors; market, financial and economic studies and forecasts; financial publications, portfolio management systems, and statistical and pricing services. Although the commissions paid by Registrant's clients shall comply with the Registrant's duty to obtain "best execution," a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the Registrant determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking "best execution," the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Registrant will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. Although the investment research products and/or services that may be obtained by Registrant will generally be used to service all of Registrant's clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account. With respect to investment research products and/or services obtained by the Registrant that have a mixed use of both a research and non-research (i.e., administrative, etc.) function, Registrant shall make a reasonable allocation of the cost of the product or service according to its use – the percentage of the product or service that provides assistance to the Registrant's investment decision-making process will be paid for with soft dollars while that portion which provides administrative or other non-research assistance will be paid for by the Registrant with hard dollars. The brokerage commissions and/or transaction fees charged by the designated broker-

dealer/custodian are exclusive of, and in addition to, Registrant's investment management fee.

Registrant will arrange for the execution of securities brokerage transactions for the account through broker-dealers that Registrant reasonably believes will provide "best execution". In seeking "best execution," the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Registrant will seek competitive commission rates, it may not necessarily obtain the lowest possible commission rates for account transactions. However, along with this particular selection criteria, the client is in no way compelled to select any broker-dealer recommended by Registrant, and may opt to choose a broker dealer of his/her choice if so desired.

Consistent with obtaining "best execution," transactions for a client's account may be effected through broker-dealers in return for research products and/or services which assist Registrant in its investment decision making process. Such research generally will be used to service all of Registrant's clients, but brokerage commissions paid by client may be used to pay for research that is not used in managing the client's account. The account may pay to a broker-dealer a commission greater than another qualified broker-dealer might charge to effect the same transaction where Registrant determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

Transactions for each client account generally will be effected independently, unless Registrant decides to purchase or sell the same securities for several clients at approximately the same time. Registrant may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Registrant's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among Registrant's clients in proportion to the purchase and sale orders placed for each client account on any given day. To the extent that the Registrant determines to aggregate client orders for the purchase or sale of securities, including securities in which Registrant's principal(s) and/or associated person(s) may invest, the Registrant shall generally do so in accordance with the parameters set forth in SEC No-Action Letter, *SMC Capital, Inc.* The Registrant shall not receive any additional compensation or remuneration as a result of the aggregation.

The client may direct Registrant to use a particular broker-dealer (subject to the Registrant's right to decline and/or terminate the engagement) to execute some or all transactions for the client's account. In such event, the client will negotiate terms and arrangements for the account with that broker-dealer, and the Registrant will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Registrant. As a result, 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. In the event that transactions for client accounts are effected through a broker-dealer that refers investment management clients to the Registrant, the potential for conflict of interest may arise.

Initial Public Offering (IPO) Policy. On occasion, Registrant, through its clearing/custodial firm relationships, may have limited access to IPO shares. Except with respect to the limited exception noted below, Registrant does not purchase and/or recommend for purchase IPOs for its individual client accounts. The exception to the above policy is for those individual clients of Registrant who, on a completely unsolicited basis, contact the Registrant to request that Registrant purchase a specific IPO for his/her/their/its account, to the extent same has been made available to Registrant. In the event of any such unsolicited request(s), Registrant, after first determining that the client(s) is *qualified* for such specific IPO (i.e., suitable for the client(s) relative to the

client's(s') investment objective(s), financial situation(s) and current asset allocation(s)), *may* (to the extent possible under the circumstances) purchase such IPO on a pro-rata basis with other unsolicited client requests. To the extent possible and applicable under the circumstances, Registrant will allocate unsolicited individual client IPO share purchases among *qualified* individual clients on a rotational basis. To the extent possible and applicable under the circumstances, the Registrant will use reasonable efforts to allocate available IPO shares on a fair and equitable basis in accordance with the terms and conditions of the aforementioned policy.

Review of Accounts

Form ADV Part 2A, Item 13

For those clients to whom Registrant provides investment supervisory services, account reviews are conducted on an annual basis by the Registrant's Managing Member, Dean M. Giella. All investment supervisory and financial planning clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person, electronically or telephonically) are encouraged to comprehensively review financial planning issues, investment objectives and account performance with the Registrant on an annual basis, as applicable.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the client accounts. Those clients to whom Registrant provides investment advisory services will also receive a quarterly report from the Registrant summarizing account activity and performance.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

Please see the response set forth above at item 12 pertaining to investment research products and/or services which assist the Registrant in its investment decision-making process for its clients, all of which transactions shall be in compliance with Section 28(e) of the Securities Exchange Act of 1934. Specifically, although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Registrant may receive from a particular broker-dealer/custodian, without cost, support services which allow Registrant to better monitor and service client accounts maintained at a particular broker-dealer/custodian.

To the extent a client is introduced to Registrant by either an unaffiliated or an affiliated solicitor, Registrant may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from Registrant's investment management fee, and shall not result in any additional charge to the client. If the client is introduced to Registrant by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/their/its solicitor relationship, and shall provide each prospective client with a copy of Registrant's written disclosure statement as same is set forth on Part II of Form ADV, including this Schedule F, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between the Registrant and the solicitor, including the compensation to be received by the solicitor from the Registrant. Any affiliated solicitor of the Registrant shall disclose the nature of his/her/their/its relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of Registrant's written disclosure statement as same is set forth in this brochure narrative.

Custody

Form ADV Part 2A, Item 15

None.

Investment Discretion

Form ADV Part 2A, Item 16

The firm will be provided limited discretionary authority through the execution by the client of a “Limited Power of Attorney”. As such, the firm will have the ability to determine, without first obtaining specific client consent, the securities to be bought or sold and the amount of securities to be bought or sold.

Voting Client Securities

Form ADV Part 2A, Item 17

The firm does not vote proxy statements on behalf of advisory clients.

Financial Information

Form ADV Part 2A, Item 18

No financial reporting is required since the firm does not require fees to be paid more than six months in advance.

Requirements for State-Registered Advisers

Form ADV Part 2A, Item 19

Not applicable.

Additional Information

In performing its services, Registrant shall not be required to verify any information received from the client or from the client's other professionals (i.e., attorney, insurance agent, accountant, etc.), and is expressly authorized to rely thereon. If requested by the client, Registrant shall recommend the services of other professionals for financial planning implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any financial planning recommendation from the Registrant. Clients are advised that it is their responsibility to notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services, or if they wish to impose any reasonable restrictions upon Registrant's management services.

Neither the Registrant nor the client may assign the *Financial Planning Agreement* and/or *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 the Registrant shall not be considered an assignment.

A copy of Registrant's written disclosure statement as set forth on Part 2A. and Part 2B.II of this Form ADV "Brochure" narrative shall be provided to each client prior to or contemporaneously with the execution of the *Financial Planning Agreement* or *Investment Advisory Agreement*. Any client who has not received a copy of Registrant's written disclosure statement at least forty-eight (48) hours prior to executing the *Financial Planning Agreement* or *Investment Advisory Agreement* shall have five (5) business days subsequent to executing the agreement to terminate the Registrant's services without penalty.

Dean Michael Giella

**Financial Educational Advisors, LLC
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Suite 312
Garden City, New York 11530**

**Phone: 516-280-8400
516-620-6921**

March 28, 2011

FORM ADV PART 2B. BROCHURE SUPPLEMENT

This brochure supplement provides information about Dean Michael Giella that supplements the Financial Educational Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Dean Michael Giella, Managing Member and Chief Compliance Officer if you did not receive Financial Educational Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Dean Michael Giella is available on the SEC's website at www.adviserinfo.sec.gov.

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Educational Background and Business Experience

Form ADV Part 2B, Item 2

DEAN MICHAEL GIELLA.

Born: September 21, 1960

Educational Background:

New York Institute of Technology – BS in Business Administration; 1989

Certified Financial Planner Licensee – 1/2001

Certified Financial Planner Professional Education Program – 10/2000

Business Background:

Financial Educational Advisors, LLC – Managing Member – 08/02 – Present

Comprehensive Asset Management and Servicing, Inc (CAMAS) – Registered Representative
4/2010 - Present

Pivotal Planning Group, L.L.C. – Investment Adviser Representative – 08/02-Present

Pivotal Planning Group, L.L.C. – Managing Director & Managing Member – 10/00-08/02

The Concord Equity Group, L.L.C. – Registered Representative – 10/00- 8/2009

PMG Securities Corporation – Registered Representative – 9/96 to 10/00

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including

- two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Disciplinary Information

Form ADV Part 2B, Item 3

None.

Other Business Activities

Form ADV Part 2B, Item 4

Mr. Giella is also a licensed insurance agent, and may recommend the purchase of insurance products on a commission basis. Mr. Giella devotes approximately twenty five percent (25%) of his time to securities and life insurance commission business. The commissions paid to the Mr. Giella for securities and life insurance business are separate and apart from Registrant's investment management fee discussed elsewhere in this narrative.

Additional Compensation

Form ADV Part 2B, Item 5

See item 4 above as compensation is earned due to the above described activities.

Supervision

Form ADV Part 2B, Item 6

Not applicable.

Requirements for State-Registered Advisers

Form ADV Part 2B, Item 7

Not applicable.