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**March 31, 2011**

**Form ADV Part 2A  
Brochure**

**This brochure provides information about the qualifications and business practices of The Moorings Group, LLC. If you have any questions about the contents of this Brochure, please contact us at (770) 395-3366 and/or [connie@mooringsgroup.com](mailto:connie@mooringsgroup.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 The Moorings Group, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for The Moorings Group, LLC is 129403.**

**Any references to The Moorings Group, LLC as a registered investment adviser or its related persons as registered Advisory Representatives does not imply a certain level of skill or training.**

**MATERIAL CHANGES**

**Item 2**

This is the initial disclosure brochure. Therefore, there are no material changes to disclose.

At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

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**ADVISORY BUSINESS**

**Item 4**

A. The Moorings Group is a limited liability company formed under the laws of the State of Georgia and filed for investment adviser registration with the Securities and Exchange Commission in February 2005. Michele M. Poirier, CRD number 828960 is a Partner and Chief Investment Officer. Her primary responsibilities include Portfolio Management, Credit and Risk Management and Client Service. Michele has been in the financial services industry since 1974. Connie F. Morris, CRD number 805172 is a Partner, Chief Operating and Compliance Officer. Her primary responsibilities include Portfolio Management, Client Service and operations. Connie has been in the financial services industry since 1973. Keith E. Mitchell serves the firm as a Strategic Adviser. Keith has been in the financial services industry since 1980. Additional business information about Michele and Connie is disclosed on the Supplemental Brochures attached to this Brochure.

B. The Moorings Group designs and actively manages custom portfolios for clients. We specialize in the fixed income asset class with a primary focus on municipals. We also manage a limited number of balanced portfolios.

**Advisory Services**

The Moorings Group offers asset management services on a discretionary basis. A Partner will gather information on your financial history, goals, objectives, and financial concerns. All information gathered from you is confidential. You will establish an account and deposit cash, cash equivalents and securities and engage The Moorings Group.

When engaging The Moorings Group as an investment manager, clients must establish an account with a qualified custodian (bank or broker-dealer). If the client does not have an existing relationship with a qualified custodian, The Moorings Group may recommend that client establish an account with Charles Schwab & Co., Inc. The client may choose a qualified custodian of their choice provided that the following conditions are met:

1. Moorings Group can establish a relationship with the requested custodian
2. Moorings Group must be granted authorization to trade and deduct advisory fees from the client account

Our advice may involve investment in mutual funds. We expect to utilize “no-load” funds. However, managed accounts are not exclusively limited to mutual funds and ETFs and may include stocks and bonds, warrants, certificates of deposits, corporate debt securities as well as commercial paper, municipal securities, government securities and money markets.

Transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

C: The Moorings Group manages portfolios which are customized to meet your individual needs. We will consult with you (or your primary adviser) to understand your financial history, goals, objectives and/or concerns. In addition, we perform an initial evaluation to determine your risk profile, current and future income and liquidity needs and tax considerations. Based on the

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information obtained from this evaluation, we will build a portfolio designed around your individual circumstances and unique risk/return requirements.

You may request trading limitations within the selected investment strategy based on your specific needs or preferences.

D: The Moorings Group is a fixed income investment manager for the “ProEquities Private Access Program”. We manage these accounts using the same processes and disciplines as other “non-wrap” fixed income accounts. We customize each portfolio based on the needs of the individual client as represented by the wrap sponsor’s representative (client’s primary advisor). The selected investment strategy for an account is managed to the same performance benchmark as “non-wrap” accounts unless otherwise requested by the client or their primary advisor. This program includes accounts of smaller size which may result in a broader range of portfolio durations and reduced liquidity. The Moorings Group is compensated by the wrap program sponsor with a portion of the wrap fee.

E: As of December 31, 2010 we had discretionary assets under management of \$362,067,325.

### General Information

The investment recommendations and advice offered by The Moorings Group are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant.

### FEES AND COMPENSATION

#### Item 5

#### Asset Management Services

1. Our fees are not based on a share of capital gains or capital appreciation of the funds or any portion of the funds in your account. Advisory fees are in accordance with the following fee schedule:

Balanced Portfolios:

Account Size	Maximum Annual Fee
\$500,000 to \$999,999	1.00%
\$1,000,000 to \$2,999,999,999	.75%
\$3,000,000 to \$4,999,999,999	.50%
\$5,000,000 to \$14,999,999,999	.35%
\$15,000,000 and above	Negotiable

Fixed Income Portfolios:

Account Size	Maximum Annual Fee
\$500,000 to \$999,999	.50%
\$1,000,000 to \$2,999,999,999	.40%
\$3,000,000 to \$4,999,999,999	.36%
\$5,000,000 to \$14,999,999,999	.25%
\$15,000,000 and above	.20%

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We sometimes make exceptions to our general fee schedule. The Moorings Group may negotiate lower fees based on the size of the portfolio or such other factors as we determine and in our sole discretion. Fee reductions or waivers are available to our firm's personnel and family members.

You may make additions to or withdrawals from your account provided it continues to meet our minimum account size requirements. Additional assets deposited into account after it is opened which represent 10% or more of total account assets will be charged a pro-rata fee based upon the number of days remaining in the then current calendar quarter. Assets withdrawn from an account after it is opened which represent 10% or more of total account assets will be charged a pro-rata fee based on the number of days in the calendar quarter up to the withdrawal date. No fee adjustments will be made for account appreciation or depreciation. If your account falls below the minimum account size requirement, The Moorings Group reserves the right to terminate our advisory services. Withdrawals from your account can affect our ability to manage your account due to reduced ability to diversify the account.

B. The fees will be charged to and collected directly from your account early in the quarter, provided you have given The Moorings Group and the custodian written authorization to debit the fee. You will be provided with an account statement from Schwab reflecting the deduction of the advisory fee as well as a statement from The Moorings Group. If your account does not contain sufficient funds to pay the advisory fees, we have the limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. Except for ERISA and IRA accounts, you may reimburse your account for advisory fees paid to The Moorings Group.

C. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. You may also pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the account. These fees are not charged by The Moorings Group and are charged by the product, broker/dealer or account custodian. The Moorings Group does not share in any portion of these fees. Additionally, on any mutual fund purchased, you may pay your proportionate share of a fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee. These advisory fees are not shared with The Moorings Group and are compensation to the fund manager. You should read the mutual fund prospectus prior to investing.

D. Advisory fees will be charged in arrears on a pro-rata basis. The billing period will be on a calendar quarterly basis (i.e. March 31, June 30, September 30, and December 31). The quarterly advisory fee will be based on the value of the account on the last business day of the just completed quarter. If the account is established or closed during the middle of a quarter, you will pay a pro-rated portion of the advisory fee based upon the number of days the account was under The Moorings Group's management.

Fee calculation example for a \$3.8 million dollar account:

Quarterly Fee: Account value (\$\$) times annual fee divided by 365 times number of days in the quarter = client's quarterly fee.  $(\$ \$ \times \text{annual fee} / 365 \times \text{number of days in quarter})$

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- **Balanced Portfolio:**  $\$3,800,000 \times .50\% = \$19,000$  divided by  $365 \times 90 =$   
**\$4,684.93 quarterly fee due**
- **Fixed Income Portfolio:**  $\$3,800,000 \times .36\% = \$13,680$  divided by  $365 \times 90 =$   
**\$3,373.15 quarterly fee due**

The Moorings Group may change the above fee schedule upon 30-days prior written notice to you.

### Termination Provisions

You may terminate our investment advisory services, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with The Moorings Group and, thereafter, upon 30-days written notice to us. Prior to the effective date of any termination, you will be responsible for any fees and charges levied by third parties as a result of maintaining your account, such as transaction fees for any securities transactions executed and account maintenance or custodial fees. If the agreement is terminated, you will pay any fees owed to The Moorings Group based on a pro-rata portion of the quarterly advisory fee up to the effective date of termination.

When acting in a sub-advisory capacity or as an investment manager in a wrap program, The Moorings Group will share in the fees based on the primary adviser/wrap sponsors billing policies and procedures, including but not limited to, calculation method, billing cycle and cash flows.

E. Neither The Moorings Group nor any Advisory Representatives of The Moorings Group accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

### **PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT      Item 6**

This section is not applicable to The Moorings Group since The Moorings Group does not charge performance based fees.

### **TYPES OF CLIENTS      Item 7**

The Moorings Group offers asset management services to individuals, trusts, estates, charitable organizations, corporations, foundations, municipalities and other business entities.

If you wish to engage The Moorings Group for advisory services, you will execute an Investment Advisory Agreement with our firm. This agreement outlines the responsibilities of you and The Moorings Group as well as any authorizations granted to our firm with regard to the management of your portfolio(s). You are required to establish an account with a qualified custodian and deposit cash, cash equivalents and/or securities to that account.

The Moorings Group will generally require a minimum of \$500,000 in account assets in order to obtain investment advisory services. In our sole discretion, we may waive the minimum account size requirement and accept accounts valued at less than \$500,000 if the client plans to add additional assets in the future and/or the client has other accounts (or related accounts) already managed by our firm. You may make withdrawals from an account provided that the account assets

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continue to meet the minimum account size requirements. If an account falls below the minimum account size requirement, we reserve the right to terminate advisory services.

Clients with assets under management of less than \$500,000 are advised that portfolio performance may suffer due to the difficulties associated with sufficiently diversifying smaller accounts.

The Moorings Group may have different minimum account requirements when participating as an investment manager in a wrap program or when acting as a sub-advisor.

### **METHODS of ANALYSIS, INVESTMENT STRATEGIES and RISK of LOSS      Item 8**

The Moorings Group specializes in custom fixed income portfolio management within the following investment strategies:

- ❖ Intermediate tax-exempt municipal
- ❖ Intermediate core fixed income
- ❖ Intermediate single state tax-exempt
- ❖ Tax aware cash management

We actively manage each client's fixed income portfolio using the following 4 step process:

1. Client evaluation: After completing the client evaluation described in 4(c), we will select an appropriate performance benchmark for each portfolio based on the risk profile and/or income requirements of each individual client.
2. Market assessment and interest rate trend analysis: Prior to constructing an initial portfolio and as a component of our ongoing active management process, we perform a "macro" investment environment analysis by examining economic fundamentals and market technicals.
3. Portfolio design and execution: We compare current portfolio attributes to the selected performance benchmark, select security attributes for purchase/sale based on interest rate trend analysis and specific security features (discount or premium, maturity, "call" or "put" features, enhancements, issuer creditworthiness, yield spread compared to appropriate benchmark securities and option-adjusted spreads), screen new issue and secondary markets, and buy or sell the most appropriate securities for the client's portfolio.
4. Portfolio Review: Risk analysis is an important component of active management and is derived from an assessment and review of various portfolio attributes including duration, issuer/sector exposures and performance. Each portfolio's profile and performance for the selected period are compared to the designated benchmark index, followed by an examination of how the portfolio performed and the contributing factors to that performance. We also monitor the designated benchmark for pertinent changes and then determine if any adjustments should be made to a client's portfolio.



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B. Investing in securities involves risk of loss, including the potential loss of the principal money you are investing. Therefore, your participation in any of the management programs offered by The Moorings Group requires you to be prepared to bear the risk of loss as well as the fluctuating performance of your accounts. Market values of investments will always fluctuate based on market conditions.

As a component of the overall risk management process, The Moorings Group performs municipal bond credit analysis on current portfolio holdings and prospective securities to be purchased. Using a multi-level process, we make our credit quality determinations by examining the following:

- \*regional/state environment (economic base concentration/diversity, demographics, governmental policy)
- \*sector assessment (fundamentals, supply, governmental policy)
- \* issuer quality (budgetary discipline, debt service burden, reserve levels)

We do not represent, warrant or imply that the services or methods of analysis we use can or will predict future results, successfully identify market tops or bottoms or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by The Moorings Group or our Advisory Representatives will provide a better return than other investment strategies.

C. As stated above in Item 5, The Moorings Group uses mutual funds in client portfolios. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers and/or the fund straying from its stated investment objective. Open ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus, which the custodian mails or emails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time The Moorings Group will direct the client to the appropriate Web page to access the prospectus.

### **DISCIPLINARY INFORMATION**

### **Item 9**

There is no reportable disciplinary information for The Moorings Group or its management persons.

### **OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS**

### **Item 10**

A., B. The Moorings Group does not have a related person who is a: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

C. Keith Mitchell is a Moorings Group LLC Member and one of three firm owners. Keith's role is that of long-term strategic planning and he has no day-to-day responsibilities in the operation of the firm and no involvement with Clients or portfolio management.

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Keith is a Member/Owner of Mitchell Hartley Advisers LLC, an investment banking boutique. Mitchell Hartley is affiliated with Burch & Co, a broker-dealer.

Keith serves as an Independent Trustee for the Franklin Mutual Recovery Fund and as an Independent Director for the Franklin Mutual Series Fund.

Keith serves as an Independent Director on the Board of Managers for Montag & Caldwell.

Keith is a shareholder in Community Capital Management (1.75% of outstanding fully diluted shares).

A potential conflict of interest exists because Keith Mitchell/Mitchell Hartley subleases office space from The Moorings Group. To protect the confidentiality of Mitchell Hartley Clients, Keith does not store any business documents in this office space.

To protect the confidentiality of Moorings Group information, Keith has no access to the firm's network and as stated in the "Privacy Safeguards", file cabinets containing confidential Client information are locked after hours.

Keith has acknowledged his fiduciary responsibility to protect the confidentiality of any Moorings Group Client information previously or inadvertently obtained.

D. The Moorings Group does not recommend the services of Third Party Managers; however, we may serve as a sub-adviser to unaffiliated investment managers and investment advisers that are registered with the Securities and Exchange Commission or various State regulatory agencies (Primary Advisers). We will manage fixed income portfolios for the Primary Adviser's clients on a discretionary basis.

### **CODE of ETHICS, PARTICIPATION or INTEREST in CLIENT TRANSACTIONS and PERSONAL TRADING**

**Item 11**

#### **Code of Ethics**

A. The Moorings Group has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. The Moorings Group takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as our policies and procedures. Further, we strive to handle your non-public information in such a way to protect information from falling into the hands of anyone who has business reason to know such information. We provide you with our Privacy Policy which details our procedures for handling your personal information. The Moorings Group maintains a code of ethics for its Advisory Representatives, supervised persons and office staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, our Code of Ethics establishes our firm's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

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B. Neither The Moorings Group nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.

C. The Moorings Group and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, The Moorings Group and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. They will not put their interests before your interest. Neither The Moorings Group nor any associated person may trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.

D. The Moorings Group is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. The Moorings Group and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

### **BROKERAGE PRACTICES**

### **Item 12**

A. As stated in the investment advisory agreement, The Moorings Group has sole discretion to select broker-dealers for executing client portfolio transactions.

On fixed income transactions, we will transact with broker-dealers who have expertise in the fixed income markets, are active as primary underwriters or secondary market makers, and who are suitable for trade execution due to the integrity, financial strength and stability of their firm. We will seek to obtain best execution for all client accounts by taking into account all relevant factors at the time of the trade, including the features of the individual security, the offering or bid price and prevailing market conditions.

We may occasionally cross securities between two managed accounts based on the needs of both the selling and buying account. This type of transaction will be executed using a non-affiliated broker-dealer and The Moorings Group receives no compensation on these trades.

We will normally execute equity and mutual fund transactions through the client account's custodian. Commission rates on these securities may be higher or lower at the client's custodian than at other qualified custodians.

The Moorings Group does not receive "soft dollar" research or benefits in connection with or as a result of client transactions.

As disclosed in Item 4 (B), The Moorings Group may recommend that Clients establish an account with Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, and member of SIPC. If selected by the Client to act as a qualified custodian, Schwab will maintain custody of

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Client's assets and facilitate the execution, clearing and settling of transactions. The Moorings Group is independently owned and operated and is not affiliated with Schwab.

B: We may aggregate the purchase or sale of securities for various client accounts when appropriate. We will primarily use individual fixed income securities, exchange traded funds and mutual funds in managing client accounts. Exchange traded funds and mutual fund transactions should experience no allocation disadvantages.

When executing an aggregated order on a fixed income security and receiving less than a 100% allocation, we will take the following factors into consideration when selecting the specific portfolios for allocation: cash balance, duration, sector, credit quality and diversification needs, and appropriate position block size. If an employee-related account is part of the aggregate order, non-related client accounts will be given priority in the allocation process.

### **REVIEW of ACCOUNTS**

#### **Item 13**

A: On at least a monthly basis, all managed portfolios will be reviewed by the portfolio manager and the Chief Investment Officer. The review process is described in Item 8 above (step 4).

B. Client portfolios may be reviewed at a different interval when triggered by a change in the individual client's circumstances or financial, regulatory or policy events that could have an impact on the fundamental credit quality of a security or sector. Clients are advised that they should promptly notify The Moorings Group of any changes to the client's financial goals, objectives or circumstances. We will use the updated information as we review the portfolio to determine if any changes may be warranted.

C: The Moorings Group will contact you (or your primary adviser/designee) on an annual basis to request the opportunity to discuss your investment portfolio and to update your financial information/objectives should any changes have occurred. You or your agent may also request this information at a time interval of your choice. We will normally provide a written report to you or your primary advisor to facilitate the discussion of your portfolio's composition and performance. You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations directly from the account custodian of all transactions. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

### **CLIENT REFERRALS and OTHER COMPENSATION**

#### **Item 14**

A. Product vendors recommended by The Moorings Group may provide monetary and non-monetary assistance with client events, provide educational tools and resources. We do not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. The Moorings Group's due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and us.

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B. The Moorings Group does not directly or indirectly compensate any person who is not a supervised person of our firm for referrals. Further, we do not receive an economic benefit from a non-client for providing investment advice or advisory services to you.

### **CUSTODY**

#### **Item 15**

The Moorings Group requires that all client accounts be maintained at a qualified custodian. The custodian will be responsible for sending account statements directly to the client's address of record on at least a quarterly basis. With the exception of deduction of The Moorings Group's advisory fees from your accounts, The Moorings Group does not take custody of your funds or securities. As noted under Item 13C above, you should compare the statement we provide you with your account custodian statement.

### **INVESTMENT DISCRETION**

#### **Item 16**

The Moorings Group offers asset management services on a discretionary basis. As stated in the Investment Advisory Agreement executed between our firm and each client, The Moorings Group shall have full discretion to supervise, manage and direct the assets in your portfolio and to purchase/sell securities as deemed appropriate based on your individual investment objectives. The Moorings Group will take into consideration any specific limitations you may request due to tax consequences or income needs.

### **VOTING CLIENT SECURITIES**

#### **Item 17**

The Moorings Group does not vote proxies on behalf of Clients. You will receive proxy materials directly from the account custodian and will have sole responsibility for all voting decisions. You may contact The Moorings Group directly with any questions about the proxy material received.

### **FINANCIAL INFORMATION**

#### **Item 18**

A. The Moorings Group will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service; therefore, a balance sheet is not required to be attached.

B. The Moorings Group has discretionary authority over client accounts; however that authority does not extend to the withdrawal of any client assets, with the exception of deduction of The Moorings Group's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.

C. Neither The Moorings Group nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

### **REQUIREMENTS for STATE REGISTERED ADVISERS**

#### **Item 19**

This section is not applicable to The Moorings Group. The Moorings Group is not state registered. The Moorings Group is registered with the Securities and Exchange Commission.