Part 2A of Form ADV: Firm *Brochure*

Item 1 Cover Page

Sedona Asset Management Services, LLC
8432 E. Quarterhorse Trail
Scottsdale, AZ 85258

Phone (480)614-5818
FAX (480)306-4275

Firm ID#132373

Contact: George C. Steer
Managing Director

Item 2 Material Changes

No material changes.

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Item 4 Advisory Business

Sedona Asset Management Services, LLC offers customized portfolio management primarily focused in exchange-listed securities and securities traded over-the-counter. The Firm will at times utilize U.S. government securities, corporate debt securities and security options contracts.

Item 5 Fees and Compensation

Sedona Asset Management Services, LLC charges management fees that range from 0.25% to 1.00% of assets. These fees are charged on a standard fiscal quarterly basis with the first fee being charged at the end of the first full quarter of service.

Item 6 *Performance-Based Fees* and Side-By-Side Management

Sedona Asset Management Services, LLC does offer performance-based fees. These fees are negotiable from 5% to 10% of profits and are assessed on a quarterly basis. These fees can be combined with fixed rate base fees ranging from 0% to 1.00%.

Item 7 Types of *Clients*

Sedona Asset Management Services, LLC primarily works with high net worth individuals, but will work with individuals, business entities, trusts, pension and profit sharing plans on a case by case basis.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Sedona Asset Management Services, LLC utilizes a long term global macro-economic bias as it's primary method of portfolio selection. Long term trend following is used as a secondary tool to reinforce strategy. The risk of a standardized portfolio approximates that of the U.S. equity markets.

Sedona Asset Management Services, LLC makes every effort to customize each portfolio to the individual client's risk levels and tolerances. Clients are asked and encouraged to make Sedona Asset Management Services, LLC aware of any changes in personal circumstances, financial condition or risk levels that have previously been discussed and agreed upon.

Item 9 Disciplinary Information

No disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

No other Financial Industry Activities and Affiliations.

Item 11 Code of Ethics, Participation or Interest in *Client* Transactions and Personal Trading

Our firm has adopted its code of ethics in compliance with Rule 20A-1 under the Advisors Act in order to specify the standard of conduct expected of it's employees. The will describe it's code of conduct in writing to it's clients and upon request will furnish clients with a copy of it's code of ethics.

Our firm recognizes that it has a fiduciary duty to our client accounts and must at all times place the interests of our firm's clients first, conduct personal securities transactions in a manor consistent with this Code and avoid any abuse of a position of trust and responsibility and adhere to the fundamental standard that access persons should not take inappropriate advantage of their positions. In addition, the firm and its access persons must comply with all applicable federal securities laws, which shall generally be explained in the firm's compliance manual. Access persons must report any violations of the Code of Ethics to the firm's Chief Compliance Officer.

No access person may purchase or sell, directly or indirectly, any security in which the access person or an affiliated account has, or by reason of the transaction acquires, any direct or indirect beneficial ownership if the access person knows or reasonably should know that the security at the time of the purchase or sale is being considered for purchase or sale on behalf of any client account or is being actively purchased or sold on behalf of any client account.

If the firm is purchasing/selling or considering for purchase/sale any security on behalf of a client account, no access person may effect a transaction in that security prior to the client purchase/sale having been completed by the firm, or until a decision has been made not to purchase/sell the security on behalf of the client account.

No access person may use his/her knowledge about the securities transactions or holdings of a client account in trading for any account that is directly or indirectly beneficially owned by the access person or for any affiliate account. Any investment ideas developed by an access person must be made available to client accounts before the access person may engage in personal transactions or transactions for an affiliate account based on these ideas.

No access person may acquire any securities in an Initial Public Offering without first obtaining pre-clearance and approval from the Chief Compliance Officer.

All access persons must submit to the Chief Compliance Officer the following reports as to all reportable securities holdings and brokerage accounts in which the access person has, or by reason of a transaction, acquires beneficial ownership: 1) Initial holdings report. 2) Quarterly reportable securities transactions reports. 3) Annual holdings report.

cont.

Item 12 Brokerage Practices

Not a broker/dealer.
Sedona Asset Management Services, LLC accepts no compensation from broker/dealers.

Item 13 Review of Accounts

All accounts are reviewed no less than monthly. Portfolios are reviewed to ensure that all holdings remain within parameters previously discussed with each individual client ant that the concentration of holdings remains acceptable to each individual clients' previously discussed acceptable level of risk.

Item 14 *Client* Referrals and Other Compensation

Sedona Asset Management Services, LLC will accept referrals from it's clients. Compensation for this is strictly prohibited.

Sedona Asset Management Services, LLC receives compensation only from it's negotiated fees with it's clients...no Other compensation of any kind is accepted.

Item 15 *Custody*

Sedona Asset Management Services, LLC does NOT custody client assets. The Firm will recommend a broker/dealer if asked by the client, however the Firm receives no compensation for this from either the client or the broker/dealer.

Item 16 Investment Discretion

Sedona Asset Management Services, LLC requires and obtains signed discretion from it's clients for authority to select securities to be both bought and sold as well as the amount of securities to be bought and sold.

Sedona Asset Management Services does NOT have discretion as to the selection of broker/dealer to be used or the commission rate paid.

Item 17 Voting *Client* Securities

Sedona Asset Management Services, LLC does not vote client securities.

Item 18 Financial Information

Not applicable as no fees are taken in advance.

Item 19 Requirements for State-Registered Advisers

Not Applicable

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Any access person need not submit: any reports with respect to securities held in accounts over which the access person had no direct or indirect influence or control, a transaction report with respect to transactions effected pursuant to an automatic investment plan, a transaction report if the report would duplicate information contained in broker trade confirmations or account statements that the firm holds in its records so long as the firm receives the conformations or statements no later than 30 after the close of the calendar quarter in which the transaction takes place.

Each access person must submit a certification of holdings report by January 31st of each calendar year that the access person has received, read, understands and is subject to the code; that he/she has complied with all the requirements of the code and has disclosed or reported all personal securities transactions, holdings and accounts required by this code.

No access person, except in the course of his/her duties, may reveal to any other person any information about securities transactions being considered for, recommended to, or executed on behalf of a client account. In addition, no associated person may use confidential information for their own benefit or disclose such information to any third party, except as such disclosure or use may be required in connection with their employment or as may be consented to in writing by the Chief Compliance Officer. These provisions shall continue in full force and effect after termination of the associated persons relationship with the firm, regardless of the reason for such termination.

All information obtained from any access person under this code normally will be kept in strict confidence by the firm. However, reports of transactions and other information under this code may be made available to the Commission, any other regulatory or self-regulatory organization or any other civil or criminal authority or court to the extent required by the law or regulation or to the extent considered appropriate by management of the firm.

Upon determining that an access person has violated this code of ethics, the firm's Chief Compliance Officer may impose such sanctions as he/she deems appropriate. These include, but are not limited to, a letter of censure, disgorgement of profits obtained in connection with a violation, the imposition of fines, restrictions on future personal trading, termination of the access person's position or relationship with the firm or referral to civil or criminal authorities.

The Chief Compliance Officer will identify each access person and notify each access person that the person is subject to this code including the reporting requirements.