

**Mark I Asset Management, Ltd.**

**3501 NW 63<sup>rd</sup> Street, Suite 104 S**

**Oklahoma City, OK 73116**

**Phone: 405-525-6688**

**Fax: 405-525-6317**

**[www.mark1wealth.com](http://www.mark1wealth.com)**

**3/31/2012**

**FORM ADV PART 2  
BROCHURE**

**This brochure provides information about the qualifications and business practices of Mark I Asset Management, Ltd. If you have any questions about the contents of this brochure, please contact us at 405-525-6688. The information in this brochure has not been approved or verified by any state securities authority.**

**Additional information about Mark I Asset Management, Ltd is also available on Oklahoma State Department of Securities website at [www.securities.ok.gov](http://www.securities.ok.gov). The searchable IARD/CRD number for Mark I Asset Management, Ltd is 104563.**

**Mark I Asset Management, Ltd is a Registered Investment Adviser. Registration with the State of Oklahoma's Department of Securities; any state securities authority does not imply a certain level of skill or training.**

## Table of Contents

<b><i>Advisory Business.....</i></b>	<b><i>1</i></b>
<b><i>Fees and Compensation .....</i></b>	<b><i>2</i></b>
<b><i>Performance-Based Fees and Side-By-Side Management.....</i></b>	<b><i>4</i></b>
<b><i>Types of Clients.....</i></b>	<b><i>5</i></b>
<b><i>Methods of Analysis, Investment Strategies and Risk of Loss .....</i></b>	<b><i>6</i></b>
<b><i>Disciplinary Information.....</i></b>	<b><i>8</i></b>
<b><i>Other Financial Industry Activities and Affiliations .....</i></b>	<b><i>10</i></b>
<b><i>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</i></b>	<b><i>11</i></b>
<b><i>Brokerage Practices .....</i></b>	<b><i>12</i></b>
<b><i>Review of Accounts .....</i></b>	<b><i>14</i></b>
<b><i>Client Referrals and Other Compensation.....</i></b>	<b><i>15</i></b>
<b><i>Custody .....</i></b>	<b><i>16</i></b>
<b><i>Investment Discretion.....</i></b>	<b><i>17</i></b>
<b><i>Voting Client Securities.....</i></b>	<b><i>18</i></b>
<b><i>Financial Information.....</i></b>	<b><i>19</i></b>

## Advisory Business

Form ADV Part 2A, Item 4

**A. Describe your advisory firm, including how long you have been in business. Identify your principal owner(s).**

Mark I Asset Management, Ltd. is an independent investment advisory firm regulated by the Securities and Exchange Commission. Jerry W. Plant founded the company in 1992 and is its sole owner. His mission was to provide a boutique investment management firm, tailoring each investment policy and strategy to the needs of the investor.

**B. Describe the types of advisory services you offer. If you hold yourself out as specializing in a particular type of advisory service, such as financial planning, quantitative analysis, or market timing, explain the nature of that service in greater detail. If you provide investment advice only with respect to limited types of investments, explain the type of investment advice you offer, and disclose that your advice is limited to those types of investments.**

Mark I provides investment supervisory services to clients. Mark I is a comprehensive wealth management company that offers advice on a broad range on investments. We do not specialize in a particular type of advisory service.

**C. Explain whether (and, if so, how) you tailor your advisory services to the individual needs of clients. Explain whether clients may impose restrictions on investing in certain securities or types of securities.**

Mark I tailor's its advisory services to the individual needs of its clients as follows:

- Asset allocation and investment policy development.
- Investment manager search and ongoing evaluation for managed investments.
- Investment performance monitoring and reporting for all investment assets.
- Identification, selection, and management of specific investment assets.
- Identification, selection, and management of alternative investment assets.
- Coordination of investment plan with income and estate tax planning.

Since Mark I does not take discretion, the client may impose restrictions on investing in certain types of securities. Additionally, the registered representatives of Mark I assess each client's investment objectives and risk tolerance in conjunction with current and anticipated economic and capital market conditions to formulate investment recommendations.

**D. If you participate in wrap fee programs by providing portfolio management services, (1) describe the differences, if any, between how you manage wrap fee accounts and how you manage other accounts, and (2) explain that you receive a portion of the wrap fee for your services.**

Mark I does not participate in any wrap fee program.

**E. If you manage client assets, disclose the amount of client assets you manage on a discretionary basis and the amount of client assets you manage on a non-discretionary basis. Disclose the date "as of" which you calculated the amounts.**

Mark I does not take on investments of discretion of client assets. As of December 31, 2011, Mark I had \$51,165,910 of non-discretionary client assets under management.

## **Fees and Compensation**

Form ADV Part 2A, Item 5

**A. Describe how you are compensated for your advisory services. Provide your fee schedule. Disclose whether the fees are negotiable.**

Fees for advisory services are determined according to the value of assets under management as follows:

Portfolio Value	Annual Fee Percentage
Up to \$ 1 Million	1.00%
From \$1 Million to \$2 Million	0.50%
Over \$2 Million	0.40%

All fees are negotiable based on the specific requirements of the individual's investment objectives, and are determined only by agreement between Mark I and its individual clients. In situations of family groups, assets of the individual members of the group are aggregated to the fee structure.

Accounts that require broad base wealth management services involving alternative investments and income and estate planning coordination may require specific fee arrangements negotiated at the time the service agreement is executed.

The minimum annual account fee is \$2,000. New client accounts will be charged pro rata on a per day basis for the first quarter under contract.

In addition, Mark I may engage a client on an hourly basis. The per hour rate will be negotiated with the client at the time the service agreement is executed.

**B. Describe whether you deduct fees from clients' assets or bill clients for fees incurred. If clients may select either method, disclose this fact. Explain how often you bill clients or deduct your fees.**

All Mark I clients are billed on a quarterly basis. A majority of client fees are deducted from client assets. However, a small minority of clients are invoiced for investment advisory services. At the end of each quarter, Mark I invoices clients for investment advisory services via US mail. This provides all clients, whether deducted directly from client assets or invoiced, an opportunity to object to investment advisory fees.

For accounts where fees are deducted from client assets, Mark I processes payment five business days after the client is invoiced, if it does not receive an objection.

**C. Describe any other types of fees or expenses clients may pay in connection with your advisory services, such as custodian fees or mutual fund expenses. Disclose that clients will incur brokerage and other transaction costs, and direct clients to the section(s) of your brochure that discuss brokerage.**

Mark I utilizes Charles Schwab and Co. as its primary custodian. Mark I also uses (and has used) Fidelity and TD Ameritrade on a small number of accounts.

Charles Schwab and Co. does not charge Mark I a custodian fee. However, Charles Schwab and Co. does charge a transaction fee on a per trade basis. Transaction fee can range from \$7.95 to \$49.95 depending on the security traded.

Mark I utilizes no-load mutual funds. However, client accounts that utilize mutual funds may be charged a fund expense by the mutual fund company. If a fund has a 12-b1 fee, that fee is remitted to Charles Schwab and Co. not Mark I. Mark I strives to utilize funds that do not have 12b-1 fees. The only fee charged by Mark I is the investment advisory fee.

D. If your clients either may or must pay your fees in advance, disclose this fact. Explain how a client may obtain a refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period. Explain how you will determine the amount of the refund.

Mark I does not require clients to pay in advance. All fees are collected as described in part A above.

E. If you or any of your supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds, disclose this fact and respond to Items [5.E.1](#), [5.E.2](#), [5.E.3](#) and [5.E.4](#).

1. Explain that this practice presents a conflict of interest and gives you or your supervised persons an incentive to recommend investment products based on the compensation received, rather than on a client's needs. Describe generally how you address conflicts that arise, including your procedures for disclosing the conflicts to clients. If you primarily recommend mutual funds, disclose whether you will recommend "no-load" funds.

2. Explain that clients have the option to purchase investment products that you recommend through other brokers or agents that are not affiliated with you.

3. If more than 50% of your revenue from advisory clients results from commissions and other compensation for the sale of investment products you recommend to your clients, including asset-based distribution fees from the sale of mutual funds, disclose that commissions provide your primary or, if applicable, your exclusive compensation.

4. If you charge advisory fees in addition to commissions or markups, disclose whether you reduce your advisory fees to offset the commissions or markups.

Mark I nor any of its supervised persons does not receive compensation for the sale of securities or other investment products. Items 1-4 are not applicable.

### ***Performance-Based Fees and Side-By-Side Management***

Form ADV Part 2A, Item 6

If you or any of your supervised persons accepts performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a client (such as a client that is a hedge fund or other pooled investment vehicle) – disclose this fact. If you or any of your supervised persons manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee, disclose this fact. Explain the conflicts of interest that you or your supervised persons face by managing these accounts at the same time, including that you or your supervised persons have an incentive to favor accounts for which you or your supervised persons receive a performance-based fee, and describe generally how you address these conflicts.

Mark I nor any of its supervised persons does not accept performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of client's assets of a client (such as a client that is a hedge fund or other pooled investment vehicle).

## ***Types of Clients***

Describe the types of clients to whom you generally provide investment advice, such as individuals, trusts, investment companies, or pension plans. If you have any requirements for opening or maintaining an account, such as a minimum account size, disclose the requirements.

Mark I provides independent, objective investment and wealth management services to individual clients, families, trusts and the community. In addition, Mark I can provide investment advisory services to pension and profit sharing plans, estates, charitable organizations, corporations, and other business entities.

As investment advisors, we financial don't sell products.

Mark I's minimum account size is \$500,000. However, Mark I may choose to deviate from the policy on a case by case basis at the sole discretion of the President or CEO. Accounts that fall below the minimum because of market conditions or withdrawals will not be excluded from advisory services for that reason only.

## **Methods of Analysis, Investment Strategies and Risk of Loss**

Form ADV Part 2A, Item 8

**A. Describe the methods of analysis and investment strategies you use in formulating investment advice or managing assets. Explain that investing in securities involves risk of loss that clients should be prepared to bear.**

Mark I security analysts primarily engage in fundamental analysis. However, from time to time, it consults cyclical and other forms of analysis such as specific information furnished by potential investment targets.

Mark I investment strategy is primarily (significantly) long-term. In addition, on a client specific basis and with client consent, Mark I may engage in short-term purchases, short sales, margin transaction, or option writing (including covered options, uncovered options, or spreading strategies).

Mark I utilizes the following to develop its investment thesis for clients:

- Financial newspapers and magazines
- Research materials provided by others
- Corporate ratings services
- Annual reports, prospectus, filings, with SEC
- Company press releases

This list is not all inclusive and is deviated from by Mark I from time to time depending on the security being analyzed.

Investing in securities markets involves a risk of loss. No return is guaranteed. Before investing in securities clients should be able to tolerate the market volatility.

**B. For each significant investment strategy or method of analysis you use, explain the material risks involved. If the method of analysis or strategy involves significant or unusual risks, discuss these risks in detail. If your primary strategy involves frequent trading of securities, explain how frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.**

Mark I does not engage in investments strategies that involve significant or unusual risks nor does it frequently trade, which can erode gains due to ordinary tax rates, transaction costs, and market dynamics.

Mark I designs for each client a diversified asset allocation plan that reduces specific risk – the risk of losing money in one stock or one group of companies. However, clients are exposed to the market risk associated with their portfolios.

Market risk is the volatility of a portfolio that occurs from market dynamics. The four standard market risk factors are stock prices, interest rates, foreign exchange rates, and commodity prices. Mark I attempts to reduce market risk by more than one or two asset classes.

Market risk cannot be avoided, but asset class diversification can reduce it. Therefore, Mark I designs portfolios based on a client's market tolerance to control the impact of market risk.

**C. If you recommend primarily a particular type of security, explain the material risks involved. If the type of security involves significant or unusual risks, discuss these risks in detail.**

Mark I does not recommend a particular type of security. Mark I designs a comprehensive wealth management plan using a variety of securities in multiple asset classes based on the objectives and risk tolerance of the



investor.

## Disciplinary Information

Form ADV Part 2A, Item 9

If there are legal or disciplinary events that are material to a client's or prospective client's evaluation of your advisory business or the integrity of your management, disclose all material facts regarding those events.

Items 9.A, 9.B, and 9.C list specific legal and disciplinary events presumed to be material for this Item. If your advisory firm or a management person has been involved in one of these events, you must disclose it under this Item for ten years following the date of the event, unless (1) the event was resolved in your or the management person's favor, or was reversed, suspended or vacated, or (2) you have rebutted the presumption of materiality to determine that the event is not material (see Note below). For purposes of calculating this ten-year period, the "date" of an event is the date that the final order, judgment, or decree was entered, or the date that any rights of appeal from preliminary orders, judgments or decrees lapsed.

Items 9.A, 9.B, and 9.C do not contain an exclusive list of material disciplinary events. If your advisory firm or a management person has been involved in a legal or disciplinary event that is not listed in Items 9.A, 9.B, or 9.C, but nonetheless is material to a client's or prospective client's evaluation of your advisory business or the integrity of its management, you must disclose the event. Similarly, even if more than ten years have passed since the date of the event, you must disclose the event if it is so serious that it remains material to a client's or prospective client's evaluation.

A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which your firm or a management person

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;

2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;

3. was found to have been involved in a violation of an investment-related statute or regulation; or

4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

Not applicable to Mark I or any of its registered representatives.

B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which your firm or a management person

1. was found to have caused an investment-related business to lose its authorization to do business; or

2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority

(a) denying, suspending, or revoking the authorization of your firm or a management person to act in an investment-related business;

(b) barring or suspending your firm's or a management person's association with an investment-related business;

(c) otherwise significantly limiting your firm's or a management person's investment-related activities; or

(d) imposing a civil money penalty of more than \$2,500 on your firm or a management person.

Not applicable to Mark I or any of its registered representatives.

C. A self-regulatory organization (SRO) proceeding in which your firm or a management person

1. was found to have caused an investment-related business to lose its authorization to do business; or

2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership;

(ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

Not applicable to Mark I or any of its registered representatives.

## ***Other Financial Industry Activities and Affiliations***

Form ADV Part 2A, Item 10

A. If you or any of your management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer, disclose this fact.

Not applicable to Mark I or any of its registered representatives.

B. If you or any of your management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities, disclose this fact.

Not applicable to Mark I or any of its registered representatives.

C. Describe any relationship or arrangement that is material to your advisory business or to your clients that you or any of your management persons have with any related person listed below. Identify the related person and if the relationship or arrangement creates a material conflict of interest with clients, describe the nature of the conflict and how you address it.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor
5. banking or thrift institution
6. accountant or accounting firm
7. lawyer or law firm
8. insurance company or agency
9. pension consultant
10. real estate broker or dealer
11. sponsor or syndicator of limited partnerships.

Not applicable to Mark I or any of its registered representatives. Mark one does not have any relationship or arrangement that is material to its advisory business or to your clients that its or any of its management persons have with any related person listed in C above.

D. If you recommend or select other investment advisers for your clients and you receive compensation directly or indirectly from those advisers that creates a material conflict of interest, or if you have other business relationships with those advisers that create a material conflict of interest, describe these practices and discuss the material conflicts of interest these practices create and how you address them.

Not applicable to Mark I or any of its registered representatives. Mark I does not recommend or select other investment advisers for its clients and it does not receive compensation directly or indirectly on any service that would create a material conflict of interest.

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

Form ADV Part 2A, Item 11

A. If you are an SEC-registered adviser, briefly describe your code of ethics adopted pursuant to [SEC rule 204A-1](#) or similar state rules. Explain that you will provide a copy of your code of ethics to any client or prospective client upon request.

Mark I has adopted the Asset Management Code of Professional Conduct as published by the CFA institute as its own. Upon request, Mark I will furnish a copy to clients.

B. If you or a related person recommends to clients, or buys or sells for client accounts, securities in which you or a related person has a material financial interest, describe your practice and discuss the conflicts of interest it presents. Describe generally how you address conflicts that arise.

Examples: (1) You or a related person, as principal, buys securities from (or sells securities to) your clients; (2) you or a related person acts as general partner in a partnership in which you solicit client investments; or (3) you or a related person acts as an investment adviser to an investment company that you recommend to clients.

Mark I does not buy or sell securities in which Mark I or its registered representatives have a material financial interest. Therefore, this section is not applicable.

C. If you or a related person invests in the same securities (or related securities, e.g., warrants, options or futures) that you or a related person recommends to clients, describe your practice and discuss the conflicts of interest this presents and generally how you address the conflicts that arise in connection with personal trading.

Representatives of Mark I may have investments in securities, mutual funds, limited partnerships, or hedge funds recommended to clients. Regardless of such ownership, such investments will not be sufficient to influence the prices or adversely affect the client's position or purchase of any recommended investment.

All investment transactions are reviewed daily by the compliance officer for possible conflict.

In addition, all client transactions (trades made by clients on their own behalf) are reviewed daily by the compliance officer.

Client needs and interests are put first and ahead of any representative's personal investment interests.

D. If you or a related person recommends securities to clients, or buys or sells securities for client accounts, at or about the same time that you or a related person buys or sells the same securities for your own (or the related person's own) account, describe your practice and discuss the conflicts of interest it presents. Describe generally how you address conflicts that arise.

Representatives of Mark I may have investments in securities, mutual funds, limited partnerships, or hedge funds recommended to clients. Regardless of such ownership, such investments will not be sufficient to influence the prices or adversely affect the client's position or purchase of any recommended investment.

All investment transactions are reviewed daily by the compliance officer for possible conflict.

In addition, all client transactions (trades made by clients on their own behalf) are reviewed daily by the compliance officer.

Client needs and interests are put first and ahead of any representative's personal investment interests.

## Brokerage Practices

Form ADV Part 2A, Item 12

A. Describe the factors that you consider in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

1. Research and Other Soft Dollar Benefits. If you receive research or other products or services other than execution from a broker-dealer or a third party in connection with client securities transactions ("soft dollar benefits"), disclose your practices and discuss the conflicts of interest they create.

- a. Explain that when you use client brokerage commissions (or markups or markdowns) to obtain research or other products or services, you receive a benefit because you do not have to produce or pay for the research, products or services.
- b. Disclose that you may have an incentive to select or recommend a broker-dealer based on your interest in receiving the research or other products or services, rather than on your clients' interest in receiving most favorable execution.
- c. If you may cause clients to pay commissions (or markups or markdowns) higher than those charged by other broker-dealers in return for soft dollar benefits (known as paying-up), disclose this fact.
- d. Disclose whether you use soft dollar benefits to service all of your clients' accounts or only those that paid for the benefits. Disclose whether you seek to allocate soft dollar benefits to client accounts proportionately to the soft dollar credits the accounts generate.
- e. Describe the types of products and services you or any of your related persons acquired with client brokerage commissions (or markups or markdowns) within your last fiscal year.
- f. Explain the procedures you used during your last fiscal year to direct client transactions to a particular broker-dealer in return for soft dollar benefits you received.

Not applicable to Mark I or any of its registered representatives. Mark I does not engage in any type of soft-dollar arrangement with any third-party.

2. Brokerage for Client Referrals. If you consider, in selecting or recommending broker-dealers, whether you or a related person receives client referrals from a broker-dealer or third party, disclose this practice and discuss the conflicts of interest it creates.

- a. Disclose that you may have an incentive to select or recommend a broker-dealer based on your interest in receiving client referrals, rather than on your clients' interest in receiving most favorable execution.
- b. Explain the procedures you used during your last fiscal year to direct client transactions to a particular broker-dealer in return for client referrals.

Not applicable to Mark I or any of its registered representatives. Mark I does not engage in a relationship with any third-party in order to receive client referrals.

**3. Directed Brokerage.**

a. If you routinely recommend, request or require that a client direct you to execute transactions through a specified broker-dealer, describe your practice or policy. Explain that not all advisers require their clients to direct brokerage. If you and the broker-dealer are affiliates or have another economic relationship that creates a material conflict of interest, describe the relationship and discuss the conflicts of interest it presents. Explain that by directing brokerage you may be unable to achieve most favorable execution of client transactions, and that this practice may cost clients more money.

b. If you permit a client to direct brokerage, describe your practice. If applicable, explain that you may be unable to achieve most favorable execution of client transactions. Explain that directing brokerage may cost clients more money. For example, in a directed brokerage account, the client may pay higher brokerage commissions because you may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

Not applicable to Mark I or any of its registered representatives. Mark I does not engage in any type of directed brokerage relationship.

**B. Discuss whether and under what conditions you aggregate the purchase or sale of securities for various client accounts. If you do not aggregate orders when you have the opportunity to do so, explain your practice and describe the costs to clients of not aggregating.**

Mark I does not aggregate the purchase or sale of securities for various client accounts. Mark I view each client as unique. The needs of each client vary on a case by case basis. Therefore, the purchase and sale of securities of each client varies on a case by case basis. While client accounts may, from time to time, hold similar securities the decision to purchase or sell those securities may differ.

Mark I views the transaction costs associated with not aggregating immaterial in relation to each client's overall wealth plan, since these costs range from \$7.95 to \$49.95.

## Review of Accounts

Form ADV Part 2A, Item 13

**A. Indicate whether you periodically review client accounts or financial plans. If you do, describe the frequency and nature of the review, and the titles of the supervised persons who conduct the review.**

Client accounts are reviewed (1) at least monthly, (2) as requested by clients, (3) as market conditions warrant, and (4) by providing clients with quarterly and annual reports. This review is either performed by Jerry W. Plant, CEO and Chairman, or by Nicholas Harroz III, President and registered representative of Mark I.

No other reviews are performed by any other person.

**B. If you review client accounts on other than a periodic basis, describe the factors that trigger a review.**

Multiple factors are considered when reviewing investment portfolios. The following is a list Mark I considering when reviewing accounts other than on a periodic basis:

- Economic conditions
- Market conditions
- Time horizons and risk tolerance of individual investors
- Company or mutual fund fundamentals
- Investment objectives of investors
- Environmental changes affecting the possible outcomes of portfolios relative to investor objectives

**C. Describe the content and indicate the frequency of regular reports you provide to clients regarding their accounts. State whether these reports are written.**

Clients are provided with written performance reports on a quarterly basis via US Mail. This report begins by providing performance record of the portfolio over time intervals that assets have been under management showing both a dollar and percentage return both before and after advisory fees.

The following pages of the report contain the investment details, which is segregated by category (stocks, bonds, mutual funds, CDs, etc). It compares beginning balances and reconciles to ending balances based on the following:

- Net additions
- Dividends and Interest
- Period capital gains
- Fees and expenses
- Gains/Distributions

Further detail is given for the percentage of each holding relative to the whole portfolio and the period return.



### ***Client Referrals and Other Compensation***

Form ADV Part 2A, Item 14

A. If someone who is not a client provides an economic benefit to you for providing investment advice or other advisory services to your clients, generally describe the arrangement, explain the conflicts of interest, and describe how you address the conflicts of interest. For purposes of this Item, economic benefits include any sales awards or other prizes.

Mark I does not engage in this type of relationship. Mark I receives no economic benefit from any third-party for any investment advice. Mark I only receives compensation from clients for investment advisory services.

B. If you or a related person directly or indirectly compensates any person who is not your supervised person for client referrals, describe the arrangement and the compensation.

Mark I does not compensate any person for client referrals. This section is not applicable.

## ***Custody***

Form ADV Part 2A, Item 15

If you have custody of client funds or securities and a qualified custodian sends quarterly, or more frequent, account statements directly to your clients, explain that clients will receive account statements from the broker-dealer, bank or other qualified custodian and that clients should carefully review those statements. If your clients also receive account statements from you, your explanation must include a statement urging clients to compare the account statements they receive from the qualified custodian with those they receive from you.

As mentioned above, Mark I does not take discretion or custody of client assets. Charles Schwab and Company is Mark I's primary custodian. Mark I uses Fidelity and TD Ameritrade for a small number of accounts, and is willing to use other custodial services such as trust departments.

Since Mark I does not take discretion, all trades are discussed with the client based on a plan prior to execution. At the execution of each trade, the client is provided with a trade confirmation, either electronically or by US mail). Mark I encourages clients to review these confirmations to ensure accuracy. In addition, clients receive monthly statements from their respective custodians. Mark I encourages clients to compare these statements to the quarterly performance reports provided by it.

### ***Investment Discretion***

Form ADV Part 2A, Item 16

If you accept discretionary authority to manage securities accounts on behalf of clients, disclose this fact and describe any limitations clients may (or customarily do) place on this authority. Describe the procedures you follow before you assume this authority (e.g., execution of a power of attorney).

Mark I does not accept discretion of behalf of clients as outlined above. Therefore, this section is not applicable.

## Voting Client Securities

Form ADV Part 2A, Item 17

A. If you have, or will accept, authority to vote client securities, briefly describe your voting policies and procedures, including those adopted pursuant to [SEC rule 206\(4\)-6](#). Describe whether (and, if so, how) your clients can direct your vote in a particular solicitation. Describe how you address conflicts of interest between you and your clients with respect to voting their securities. Describe how clients may obtain information from you about how you voted their securities. Explain to clients that they may obtain a copy of your proxy voting policies and procedures upon request.

Mark I does not accept authority to vote client securities. Therefore, this section is not applicable.

B. If you do not have authority to vote client securities, disclose this fact. Explain whether clients will receive their proxies or other solicitations directly from their custodian or a transfer agent or from you, and discuss whether (and, if so, how) clients can contact you with questions about a particular solicitation.

Mark I does not have the authority to vote client securities. Clients receive their proxies directly from the custodian, Charles Schwab and Company.

Mark I believes that each investors has a responsibility to vote his/her own proxy because he/she bears the risk of loss for the investment. Mark I is available via phone, email, or in person to consult with a client on any aspect of his investments, including questions about proxy solicitation.

## Financial Information

Form ADV Part 2A, Item 18

A. If you require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, include a balance sheet for your most recent fiscal year.

1. The balance sheet must be prepared in accordance with generally accepted accounting principles, audited by an independent public accountant, and accompanied by a note stating the principles used to prepare it, the basis of securities included, and any other explanations required for clarity.

2. Show parenthetically the market or fair value of securities included at cost.

3. Qualifications of the independent public accountant and any accompanying independent public accountant's report must conform to [Article 2 of SEC Regulation S-X](#).

Mark I does not solicit prepayment of more than \$1,200 in fees per client or six months or more in advance. Therefore, this section is not applicable.

B. If you have discretionary authority or custody of client funds or securities, or you require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, disclose any financial condition that is reasonably likely to impair your ability to meet contractual commitments to clients.

This section is not applicable based on our answer in A above.

C. If you have been the subject of a bankruptcy petition at any time during the past ten years, disclose this fact, the date the petition was first brought, and the current status.

If you are registering or are registered with one or more state securities authorities, you must respond to the following additional Item.

Mark I has not been subject to bankruptcy. Therefore, this section is not applicable.



