

Part 2A of Form ADV: *Firm Brochure*

Atwood & Palmer, Inc.

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03/31/2012

This brochure provides information about the qualifications and business practices of Atwood & Palmer, Inc.. If you have any questions about the contents of this brochure, please contact us at 816-931-2266 or spalmer@atwoodpalmer.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 Atwood & Palmer, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 104995.

Item 2 Material Changes

This Firm Brochure, dated 03/31/2012, provides you with a summary of Atwood & Palmer, Inc.'s advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This Item is used to provide our clients with a summary of new and/or updated information; we will inform of the revision(s) based on the nature of the information as follows.

1. Annual Update: We are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of December 31. Please contact us if you would like the full revised Brochure within 120 days of our FYE.
2. Material Changes: Please note the material changes to our Firm Brochure. "Material changes" requiring prompt notification will include changes of ownership or control; location; disciplinary proceedings; significant changes to our advisory services or advisory affiliates – any information that is critical to a client's full understanding of who we are, how to find us, and how we do business.

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Item 4 Advisory Business

Atwood & Palmer, Inc., an SEC-registered investment adviser, founded in 1990, has provided investment advisory services for over 20 years.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Steven N Palmer, President

Atwood & Palmer, Inc. offers the following advisory services to our clients:

INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT

Atwood & Palmer, Inc. may enter into a Discretionary Investment Management Agreement with its clients. Atwood & Palmer, Inc. provides individualized discretionary investment management services to various categories of institutional and individual clients who contract with us directly. After thorough discussions, we help create an individualized Investment Policy Statment (IPS) based on client goals, objectives, risk tolerances, liquidity needs and suitability. The IPS dictates how we will customize and manage each client's investment portfolio. The IPS is a document, reviewed regularly, and may be modified as clients goals, objectives, risk tolerances and liquidity needs evolve.

We manage advisory accounts on a discretionary basis and are guided by the Investment Policy Statement, current and projected market conditions and tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Recommendations generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issues
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities

- Options contracts on securities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests

Investments are generally made in individual securities. Atwood & Palmer, Inc. may employ various Exchange Traded Fund models for further diversification or to gain exposure to other areas of the financial markets (i.e. International and Emerging markets, Commodities, Volatility, etc).

Certain investments involve varying degrees of risk. All investments are recommended and implemented only when consistent with the clients stated Investment Policy Statement.

AMOUNT OF MANAGED ASSETS

As of 02/29/2012, we actively manage \$486,426,080 of client assets on a discretionary basis.

Item 5 Fees and Compensation

INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT FEES

Atwood & Palmer Inc.'s has two fee schedules (please see below). One schedule is for taxable accounts and one schedule is for tax exempt accounts:

Taxable Accounts

\$0 - \$2 million	1%
\$2 - \$5 million	0.75%
\$5 - \$10 million	0.55%
Over \$10 million	Negotiable

Tax Exempt Accounts

\$0 - \$2 million	0.75%
\$2 - \$5 million	0.60%
\$5 - \$10 million	0.35%
Over \$10 million	Negotiable

Atwood & Palmer, Inc.'s discretionary Investment Management Agreement authorizes the deduction of client management fees directly from the client account(s) at the custodian, or,

to invoice the client directly.

Atwood & Palmer Inc. may, for the benefit of the client(s), group related client accounts together to determine the annualized fee.

Atwood & Palmer Inc. calculates and invoices its management fees on a calendar quarter basis, in arrears, based on the average of the three preceding month-end account values. Additionally, fees are calculated on a graduated basis (sliding scale), and for each portion of an account falling within a specific category, the appropriate percentage fee is applied to the value of the assets in that category.

For Investment Management Agreements commencing on any day other than the beginning of a quarter, that quarters fee shall be prorated for the actual period that the account is under management.

Limited Negotiability of Advisory Fees: Although Atwood & Palmer, Inc. has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fee arrangements on a client-by-client basis. We may negotiate our investment management fee based upon certain criteria (e.g. historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc).

GENERAL INFORMATION

Termination of the Advisory Relationship: An Investment Management Agreement may be canceled at anytime, by either party, for any reason upon receipt of 30 days written notice. As previously disclosed, fees are paid in arrears. Upon termination of any account, any unpaid fees will be charged to the account or billed to the client directly. The final management fee will be calculated on a prorated basis, accounting for the the number of days in the billing period.

Mutual Fund Fees: All fees paid to Atwood & Palmer, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by any mutual fund and/or exchange traded fund. The details of the fees and expenses can be found in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and occasionally a distribution fee. If the fund also imposes sales charges, shareholders may incur an initial or deferred sales charge. Atwood & Palmer, Inc. does NOT receive commissions or 12b-1 fee compensation.

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

ERISA Accounts: Atwood & Palmer, Inc. is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to

specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, restrictions concerning certain forms of compensation.

Prepayment of Fees: Atwood & Palmer, Inc. does not require or solicit, under any circumstances, payment of fees in advance of services rendered. As mentioned before, Atwood & Palmer Inc. calculates and bills its management fees, on a calendar quarter basis, in arrears.

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

Atwood & Palmer, Inc. does not use a performance-based fee structure.

Item 7 Types of Clients

Atwood & Palmer, Inc. provides investment advisory services to individuals, pension and profit sharing plans, charitable organizations, corporations, trusts and other business entities.

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

Security analysis methods may include fundamental and technical analysis.

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the individual companies) to determine if the security is appropriately valued.

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

Technical Analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform, regardless of market movement.

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

misleading information.

INVESTMENT STRATEGIES

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's goals, objectives, risk tolerance, liquidity needs and suitability, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them in the client's account for greater than a year. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases. When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

Option writing. Atwood & Palmer, Inc. may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. The two types of options are calls and puts:

- A call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we anticipate that the stock will increase substantially before the option expires.
- A put gives us the right to sell an asset at a certain price within a specific period of time. We will buy a put if we anticipate that the price of the stock will fall before the option expires.

Atwood & Palmer, Inc. may use options to invest in an asset that we anticipate will move in one direction or another. We will also use options to "hedge" a purchase of the underlying security; in other words, we will use an option purchase to limit the potential volatility of a security we have purchased for your portfolio.

Risk of Loss. Security investments are subject to market risk, are not guaranteed, and investors may lose some or all of the investment in any particular security.

Item 9 Disciplinary Information

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

Our firm and its employees have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Neither Atwood & Palmer, Inc. nor our employees are registered or have an application to register as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor. Atwood & Palmer, Inc. has no relationships or arrangements material to our advisory business or to our clients with any of the following:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker
- Financial Planners
- Futures commission merchant, commodity pool operator, or commodity trading supervisor
- Accountant or accounting firm
- Law firm
- Insurance company or agency
- Pension consultant
- Real estate broker or dealer
- Sponsor or syndicator of limited partnerships

Steven N. Palmer (personally) and Atwood & Palmer, Inc. collectively own less-than five percent (5%) a nationally chartered trust company, National Advisors Holdings, Inc. (NAH). Mr. Palmer is a volunteer, non-compensated director of National Advisors Trust Company. The trust company offers a low cost alternative to traditional custodians and trust service providers.

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

Atwood & Palmer, Inc. has established and adopted a Code of Ethics Policy to further its compliance with federal and state securities laws. Atwood & Palmer, Inc. and its employees shall subscribe to the highest standards of ethical and professional conduct. Any issue that may arise must be resolved in a manner reflecting the clients best interest.

All employees must avoid any event, transaction or position that might be deemed to create a potential conflict of interest with any client's interest. Any variety of activities, events or matters may cause a potential conflict of interest, and if any question arises, the course of action is to refrain from the activity, event or matter.

Any employment or other outside activity by an employee that may result in a conflict of interest for the employee or the firm must be preapproved by the Compliance Officer. Involvement in purely social, religious or charitable organizations typically do not require approval unless it involves funds or securities.

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

Atwood & Palmer, Inc.'s Personal Trading Policy allows employees to maintain personal securities accounts provided all trading activity is consistent with Atwood & Palmer, Inc.'s fiduciary duty to clients and consistent with regulatory requirements. Each employee must identify any personal investment accounts upon employment and annually thereafter, along with reporting all required transactions and investment activity on at least a quarterly basis to the firm's Compliance Officer.

If any person has reason to believe that another employee of Atwood & Palmer, Inc. has violated the Code of Ethics provisions, such person must notify the Compliance Officer or a member of senior management. This information will be maintained with the utmost confidentiality to be dealt with appropriately.

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

Atwood & Palmer, Inc. and individuals associated with our firm are prohibited from buying or sellings securities for any employee from clients. (principal transactions)

Atwood & Palmer, Inc. and individuals associated with our firm are prohibited from acting as a broker for both the client and the counterparty (a person on the other side of the transaction). (agency cross transactions)

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

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

It is the expressed policy of our firm that no person employed by Atwood & Palmer, Inc. may execute a purchase or sell transaction when there is a pending buy or sell transaction in the same security in a client account until that order is cancelled or executed, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

A copy of our Code of Ethics is available to clients and prospective clients upon request. Contact Steven Palmer at 816/931-2266 or spalmer@atwoodpalmer.com.

Item 12 Brokerage Practices

Atwood & Palmer, Inc. does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

Atwood & Palmer, Inc. uses more than one broker-dealer and custodian. It does not restrict clients to one entity as the broker-dealer or custodian, but allows clients to choose the entity they desire to use. However, clients may choose any custodian, broker-dealer, based on factors other than Atwood & Palmer, Inc.'s recommendations or suggestions. Atwood & Palmer, Inc. executes transactions primarily through the custodian for the account who then acts as the broker-dealer. Atwood & Palmer, Inc. strives to execute securities transactions for clients in such a manner that is most favorable under the circumstances.

Atwood & Palmer, Inc. uses and suggests broker-dealers and custodians to clients and informs them about certain available entities to perform these services, with the intent that the client decides which entities to use based on available information and their own preferences. Atwood & Palmer, Inc. suggests entities considering the full range and quality of services, including execution compatibility, account access and information, rates, overall fees and account costs and the prior experience, with respect to; responsiveness, service, reputation, honesty, integrity and the financial stability of the custodian, among other possible factors.

If the client selects a firm other than one suggested by Atwood & Palmer, Inc., our ability to negotiate and obtain lower account costs, including commissions, may be lessened. Furthermore, when a client directs that Atwood & Palmer, Inc. use a certain custodian that is a broker-dealer through whom all transactions in the account must be executed, the client may be responsible for negotiating the transaction costs with the broker-dealer. Atwood & Palmer, Inc. may not negotiate transaction costs based on the pre-existing relationship of the client with the custodian and will so inform the client they are responsible for negotiating commissions.

When a client designates a broker-dealer or custodian other than one suggested by Atwood & Palmer, Inc., higher costs may result than might otherwise be available. In these instances, institutional rates negotiated by Atwood & Palmer, Inc. based on volume may be unavailable to the client at another broker-dealer or custodian. Atwood & Palmer, Inc. may be further prohibited from executing a transaction with the dealer, specialist or market maker for the particular security; and transactions may be placed on an agency basis by the custodian, then to the dealer, specialist or market-maker.

In certain instances, Atwood & Palmer, Inc. may allow a custodian, such as a bank, to negotiate transaction costs upon the execution of an order placed by it through the bank as custodian. Because the bank may have higher volume and thereby greater negotiating ability to obtain lower transaction costs, Atwood & Palmer, Inc. places the order with the bank and

allows the bank to determine the broker-dealer to be used to execute the transaction. Transaction costs to the client may or may not be higher than obtainable elsewhere, based on the custodian's execution and its ability to negotiate lower transaction costs. Atwood & Palmer, Inc. will block trades where possible and when advantageous to clients. Block trading may allow us to execute equity trades in a more timely and equitable manner, as well as achieve an average price per share. Atwood & Palmer, Inc. will typically aggregate trades among clients whose accounts can be traded at a given broker-dealer or custodian.

Atwood & Palmer, Inc.'s block trading policy and procedures are as follows:

- 1) In executing substantially identical orders, Atwood & Palmer, Inc. may group orders of clients together for execution. Client accounts remain individually managed according to each client's needs, but if transactions are advisable for a number of accounts at the same time, the orders for the transactions may be grouped together. By grouping these orders, Atwood & Palmer, Inc. intends that better execution and price be achieved.
- 2) In grouping orders for execution, the share amounts are pre-allocated to accounts in advance of the orders being placed. If the order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated on a pro basis rata among the participating client accounts. A consistent block order trading rotation process is followed.
- 3) The portfolio manager must reasonably believe that the order aggregation will benefit, and will enable Atwood & Palmer, Inc. to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct. Best execution includes the duty to seek the best quality of execution, as well as the best net price.
- 4) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Compliance Officer no later than the morning following the execution of the aggregate trade.
- 5) Atwood & Palmer, Inc. may combine client orders with advisory personnel accounts who will be managed under an Investment Management Agreement. The advisory personnel accounts receive the same execution and costs as clients and is not preferred in any manner by being included in these group orders.
- 6) Because of the varying manner in which client transactions may be executed, whether through various client-designated custodians and broker-dealers or at the discretion of Atwood & Palmer, Inc., multiple executions in the same security may occur on the same day at varying prices and commissions for clients. In all instances when executing client transactions, Atwood & Palmer, Inc. strives to act in the best interest of the client.
- 7) Atwood & Palmer, Inc. has adopted policies and procedures for its order execution. It reviews order execution on a systematic basis to assure correct placement of the order, the best price and best execution and otherwise to protect its clients' interests. It further reviews relationships with the broker-dealer and custodian in their entirety on an annual basis. This

annual review covers the same factors considered in initially selecting the broker-dealer and custodian, such as the full range and quality of services, execution compatibility, account access and information, rates, overall fees and account costs, and the prior experience, responsiveness, service, reputation, honesty, integrity and the financial stability of the broker-dealer or custodian, among other possible factors. In particular, Atwood & Palmer, Inc. reviews its past experience and relationship with the broker-dealer or custodian.

8) Atwood & Palmer, Inc. does not recommend or select certain custodians or broker-dealers based on the value of products, research or services received. If products, research or services are received, they are received as part of the execution process or custodial relationship evaluated by Atwood & Palmer, Inc., not in addition to the relationship in exchange for transactions.

9) No client or account will be favored over another.

10) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's Investment Management Agreement with Atwood & Palmer, Inc. or our firm's order allocation policy.

Item 13 Review of Accounts

INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT

REVIEWS: Atwood & Palmer, Inc. conducts informal reviews on a periodic basis depending on market conditions and the status of any particular account.

Accounts are reviewed in the context of the stated Investment Policy Statement. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. While the underlying securities within in each account are continually monitored, client accounts are reviewed regularly.

Reviewers consist of Steven N. Palmer, President, William L. Atwood, Vice President, Steven P. Franke, Investment Manager, Spencer A. Jones, Investment Manager, Peter J. Sowden, Investment Manager, and William N. Palmer, Investment Professional.

REPORTS: In addition to the statements and confirmations of transactions that clients receive from their custodians, Atwood & Palmer, Inc. provides portfolio summaries and appraisals on a monthly basis to clients; and may also include a purchase and sale report if applicable. Atwood & Palmer, Inc. periodically meets with each client to discuss their objectives, goals, needs, and our assessment of the current investment environment. Statements are furnished by the custodian for each respective account, of which, Atwood & Palmer, Inc. also receives a copy.

Item 14 Client Referrals and Other Compensation

Atwood & Palmer, Inc. may pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our *Firm Brochure*) and a separate disclosure statement that includes the following information:

- the Solicitor's name and relationship with our firm;
- the fact that the Solicitor is being paid a referral fee; and
- the structure of the fee; and

For referring business to Atwood & Palmer, Inc., the compensation is based on a percentage of fees received by Atwood & Palmer, Inc. from the client. Each arrangement with a solicitor for client accounts is separately determined. Clients do not pay higher advisory fees as a result of any solicitation arrangement.

The disclosure defines the arrangement with the Solicitor and the client will sign that they are in receipt of the disclosure.

It is Atwood & Palmer, Inc.'s policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 Custody

Atwood & Palmer, Inc. previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm may directly debit advisory fees from client accounts.

As part of this billing process, the custodian is advised of the fee amount to be deducted from the client's account. Client assets are held in the custody of a qualified custodian agreed upon by the client and Atwood & Palmer, Inc. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

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

In addition to the periodic statements that clients receive directly from their custodians, Atwood & Palmer, Inc. also sends account reports directly to clients on a monthly basis. Included within those monthly reports is a disclaimer urging our clients to carefully compare the information provided on these statements to ensure that all account transactions,

holdings and values are correct and current.

Our firm does not have custody of client accounts.

Item 16 Investment Discretion

Clients may hire Atwood & Palmer, Inc. to provide discretionary investment management services, in which case we have the ability to place trades in a client's account without prior authorization from the client. Our discretionary authority includes the ability to do the following without contacting the client:

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

Clients give Atwood & Palmer, Inc. discretionary authority when they sign an Investment Management Agreement. The determination of a security and the amount may be limited by the needs, goals and objectives of the client, and any further limitations must be communicated by the client to Atwood & Palmer, Inc. Clients may also change/amend such limitations by modifying their Investment Policy Statement.

Item 17 Voting Client Securities

Atwood & Palmer, Inc. vote proxies for all client accounts; however, the client always has the right to vote proxies on their own behalf. Clients should notify Atwood & Palmer, Inc. in writing should they choose to vote proxies for their own accounts.

Atwood & Palmer, Inc., as a matter of policy, will vote proxies for portfolio securities consistent with the best economic interests of the clients. Proxy voting authority is defined in each client's respective Investment Management Agreement.

Atwood & Palmer Inc. uses ProxyEdge, a third party software to facilitate electronic voting and storage of records. Absent material conflicts, Atwood & Palmer Inc. has elected to vote "For" management proposals, "Against" shareholder proposals, and "Abstain" from all others.

This policy demonstrates that there would produce no conflict of interest and any deviation from the stated policy is documented in the proxy records. Any potential conflict of interest would be approved in writing from the Compliance Officer prior to voting deadline.

Clients may request how Atwood & Palmer, Inc. voted a specific proxy ballot. Atwood & Palmer, Inc. would then respond to the client describing how a specific proxy was voted and why. The request and subsequent response will be documented in the proxy record file.

Clients may instruct us to vote proxies according to particular criteria (i.e. to always vote with or against management). These requests must be made in writing. You can instruct us on how to cast your vote by contacting us at (816) 931-2266.

With respect to ERISA accounts, we will vote proxies unless the plan documents specifically reserve the plan sponsor's right to vote proxies. To direct us to vote a proxy in a particular manner, clients should contact Atwood & Palmer, Inc. by telephone, email, or in writing.

You may request in writing a copy of the firm's proxy policies and procedures. The request and subsequent response will be documented in the proxy record file. All proxy records are in accordance with the Security and Exchange Commissions' 5-year retention requirement.

Item 18 Financial Information

Under no circumstances does Atwood & Palmer, Inc. require or solicit payment of fees in advance of services rendered. Therefore, we are not required to include a financial statement.

Atwood & Palmer, Inc. has not been the subject of a bankruptcy petition at any time during the past ten years.