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This disclosure brochure provides clients with information about the qualifications and business practices of Robert John Aldridge d/b/a Aldridge & Co. ("Aldridge & Co."), a registered investment adviser. It also describes the services Aldridge & Co. provides as well as background information on those individuals who provide investment advisory services on behalf of Aldridge & Co. Please contact Robert Aldridge at 949-859-1802 if you have any questions about the contents of this disclosure brochure.

The information in this disclosure brochure has not been approved or verified by any state securities authority. Registration does not imply that Aldridge & Co. or any individual providing investment advisory services on behalf of Aldridge & Co. possess a certain level of skill or training. Additional information about Aldridge & Co. is available on the Internet at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Aldridge & Co. is 105015.

MATERIAL CHANGES

The following material changes have occurred since January 17, 2012, the date when Aldridge & Co. last updated its Form ADV Part 2A disclosure statement:

Recent amendments to the regulations governing investment advisers has raised the threshold for registration with the Securities and Exchange Commission (SEC) from \$25 million in assets under management to \$100 million in assets under management.

As a result of these changes, Aldridge & Co. is required to withdraw from registration with the SEC and register as an investment adviser with the State of California. As a state-registered investment adviser, Aldridge & Co. is required to make additional disclosures. These additional disclosures can be found starting on page 13 of this Form ADV Part 2A disclosure statement.

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ADVISORY BUSINESS

Company

Robert John Aldridge d/b/a Aldridge & Co. is a California sole proprietorship that has been providing investment advisory services since 1983. Throughout this disclosure brochure, the company is referred to as "Aldridge & Co."

The owner of Aldridge & Co. is Robert John Aldridge.

Services

Aldridge & Co. provides long-term asset allocation Investment Management Services, defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, Aldridge & Co. develops a client's personal investment policy and creates and manages a portfolio based on that policy.

Aldridge & Co. will create a portfolio consisting primarily of mutual funds, although other types of investments may be utilized. Aldridge & Co. will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. The mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances.

Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

Our Assets Under Management

As of December 31, 2011, the total amount of client assets managed by Aldridge & Co. is approximately \$41,000,000. All client assets are managed on a discretionary basis.

FEES AND COMPENSATION

Investment Management Fees

The annual fee for Investment Management Services will be charged as a percentage of assets under management according to the following schedule:

Assets Under Management	Quarterly Fee (%)	Annual Equivalent (%)
\$0 to \$100,000	.375%	1.50%
\$100,001 to \$1,000,000	.25%	1.00%
Over \$1,000,000	.125%	0.50%

Aldridge & Co. bills clients quarterly in arrears based upon the value (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance), of the client's account at the end of the quarter. Unless otherwise agreed to, Aldridge & Co. is authorized to invoice the account custodian directly for its fees.

Additional Compensation

In the event the client desires, the client can engage Robert Aldridge, Principal of Aldridge & Co., to provide securities brokerage services under a commission arrangement. Under this arrangement, the client may implement securities transactions through Robert Aldridge in his capacity as a registered representative of Centaurus Financial, Inc., a FINRA-registered broker-dealer ("Centaurus"). Brokerage commissions may be charged by Centaurus to effect these securities transactions and thereafter, a portion of these commissions will be paid by Centaurus to Mr. Aldridge. Prior to effecting any transactions, the client will be required to enter into a new account agreement with Centaurus. The brokerage commissions charged by Centaurus may be higher or lower than those charged by other broker dealers.

In addition, Mr. Aldridge will receive additional ongoing 12b-1 fees for mutual fund purchases from the mutual fund company during the period that the client maintains the mutual fund investment.

While Mr. Aldridge, in his individual capacity as an investment adviser representative of Aldridge & Co., does not sell securities products to his investment advisory clients, he does, in his individual capacity as a registered representative of Centaurus, sell securities products to his investment advisory clients. Compensation earned by Mr. Aldridge in his capacity as a registered representative of Centaurus is separate and in addition to advisory fees charged by Aldridge & Co. This practice presents a conflict of interest because Mr. Aldridge has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the cost to the client. However, Clients are under no obligation, contractually or otherwise, to purchase securities products through Mr. Aldridge, and clients are free to implement Aldridge and Co.'s recommendations through any broker-dealer that they choose.

Commissions (including asset-based distribution fees from the sale of mutual funds) are the primary source of compensation to Mr. Aldridge.

Robert Aldridge, Principal of Aldridge & Co., is licensed with the State of California Department of Insurance to sell various forms of insurance. Mr. Aldridge has an

agency relationship with several insurance companies to transact life and disability insurance business on behalf of his clients. When acting in the capacity of a licensed agent, Mr. Aldridge will receive the normal and customary commissions. Aldridge & Co. will not offset such commissions against its management fees charged.

Insurance commissions earned by Mr. Aldridge are separate and in addition to the advisory fees charged by Aldridge & Co. This practice presents a conflict of interest because Mr. Aldridge has an incentive to recommend insurance products to clients for the purpose of generating commissions rather than solely based on the cost to the client. However, clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Aldridge and may purchase such insurance products through any nonaffiliated agent.

All clients are required to acknowledge disclosure of the above-mentioned conflicts of interest through Aldridge & Co.'s investment management agreement.

Important Additional Information

Fees Negotiable

Aldridge & Co. retains the right to modify fees in its sole and absolute discretion, on a client-by-client basis based on the size, complexity and nature of the advisory services provided.

Direct Debiting of Client Accounts

In order for Aldridge & Co.'s advisory fees to be directly debited from a client's account, the client must provide written authorization permitting Aldridge & Co. to bill the custodian. In addition, the account must be held by a qualified custodian and the qualified custodian must agree to either send to the client an account statement on at least a quarterly basis or provide access to such account statement through the qualified custodian's web site on at least a quarterly basis. The account statement must indicate all amounts disbursed from the account including the amount of advisory fees paid directly to Aldridge & Co. Clients are informed that it is their responsibility to verify the accuracy of the fee calculation and that the account custodian will not determine whether the fee is properly calculated.

Termination of Client Relationship

A client agreement may be canceled at any time, by either party, for any reason upon receipt of thirty (30) days prior written notice. If no notice is given, however, the date an account is closed or transferred by the client will be deemed notice of termination. A thirty (30) day prorated fee will be added to the final billing based upon the highest account balance in the three (3) months prior to account termination. Because Aldridge & Co. bills clients in arrears, no refund will be due.

Mutual Fund Fees

All fees paid to Aldridge & Co. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial, level, or deferred sales charge.

A client could invest in a mutual fund directly, without the services of Aldridge & Co. In that case, the client would not receive the services provided by Aldridge & Co. which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives.

To the extent that client assets are invested in money market funds or cash positions, the fees for monitoring those assets are in addition to the fees included in the internal expenses of those funds paid to their own investment managers, which are fully disclosed in each fund's prospectus. Accordingly, the client should review both the fees charged by the funds and the fees charged by Aldridge & Co. to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Trading and Other Costs

All fees paid to Aldridge & Co. for investment advisory services are separate and distinct from transaction fees charged by broker dealers associated with the purchase and sale of equity securities. Such fees may include odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, mutual fund management fees and expenses, transfer agent fees and other fees and taxes on brokerage accounts and securities transactions including 12B-1 fees, annuity and variable life expenses, IRA and Qualified Retirement Plan fees, and other charges required by law. Aldridge & Co. may receive a portion of these fees. Such fees are not offset against investment management fees charged by Aldridge & Co.

In addition, fees do not include the services of any co-fiduciaries, accountants, broker dealers or attorneys. Please see the section entitled "Brokerage Practices" on page 8 of this disclosure brochure for additional information on brokerage and other transaction costs.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Aldridge & Co. does not accept performance-based fees (e.g., fees based on a share of capital gains on or capital appreciated of the assets in a client's account).

TYPES OF CLIENTS

Aldridge & Co. provides investment advisory services to individuals (including high net worth individuals), and state and municipal government entities.

Engaging the Services of Aldridge & Co.

All clients wishing to engage Aldridge & Co. for investment advisory services must first enter into an investment management agreement as well as complete any other document or questionnaire provided by Aldridge & Co. The investment management agreement describes the services and responsibilities of Aldridge & Co. to the client. It also outlines Aldridge & Co.'s fee in detail. In addition, clients must complete certain broker-dealer/custodial documentation. Upon completion of all these documents, Aldridge & Co. will be considered engaged by the client. Clients are responsible for ensuring that Aldridge & Co. is informed in a timely manner of changes in their investment objectives and risk tolerance.

Neither Aldridge & Co. nor the client may assign the investment management agreement without the consent of the other party.

A copy of Aldridge & Co.'s privacy policy notice and this written disclosure statement are provided to each client prior to or contemporaneously with the execution of the investment advisory agreement. Any client who has not received a copy of Aldridge & Co.'s written disclosure statement at least forty eight (48) hours prior to executing the investment advisory agreement shall have five (5) business days subsequent to executing the agreement to terminate Aldridge & Co.'s services without penalty.

Conditions for Managing Accounts

Aldridge & Co. does not have any minimum account size or minimum annual fee requirements.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Types of Investments

Investment advice may be offered on any investments held by a client at the start of the advisory relationship. Recommendations for new investments will typically be limited to domestic equity securities, corporate debt securities, commercial paper, certificates of deposit, municipal and United States government securities, mutual funds, partnerships investment in real estate, variable life insurance and variable annuities.

Investment Strategies

Aldridge & Co. may utilize different investment strategies, based upon the needs of the client, including long-term purchases (securities are held at least one year), short-term purchases (securities are held less than one year) and margin transactions. Aldridge & Co. utilizes an asset allocation methodology to diversify the investment portfolio by investing in various asset classes.

Security Analysis

The security analysis methods employed by Aldridge & Co. include fundamental, technical and cyclical analysis.

Sources of Information

In conducting security analysis, Aldridge & Co. may utilize the following sources of information: financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses and filings with the U.S. Securities and Exchange Commission.

Risk

In General

Investing in securities involves risk of loss that each client should be prepared to bear. Typical investment risks include market risk typified by a drop in a security's price due to a company specific event (e.g. unsystematic risk), or general market activity (e.g., systematic risk). In addition, certain strategies may impose more risk than others. For example, with fixed income securities, a period of rising interest rates could erode the value of bond since bond values generally fall as bond yields rise. Investment risk with international equities also includes fluctuation in currency values, differences in accounting and economic and political instability. Depending upon the client need and investment mandate, Aldridge & Co. will attempt to evaluate the applicable risks.

Margin Transactions

When buying stocks on margin, you are employing leverage as an investing strategy. Leverage allows you to extend your financial reach by investing using borrowed funds while limiting the amount of your own cash you expend. Please note, however, that this can involve a high degree of risk. Some of these risks include:

- Losing more money than you have invested;
- Being required to deposit additional cash or securities in your account on short notice to cover market losses;
- Being forced to sell some or all of your securities when falling stock prices reduce the value of your securities; and
- Having your brokerage firm sell some or all of your securities without consulting you to pay off the loan it made to you.

Aldridge & Co. does not recommend the use of margin accounts for any investor. If a client wishes to establish a margin account contrary to the recommendation of Aldridge & Co., it will be the client's sole responsibility to understand the risks and the rules and regulations that apply to their margin account.

Cash Management

Uninvested funds that are in a client's account are held in an interest bearing account.

DISCIPLINARY HISTORY

Neither Aldridge & Co. nor any of its supervised persons have ever been disciplined by a regulatory agency.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Registered Representative

Robert Aldridge, Principal of Aldridge & Co., is also a registered representative of Centaurus Financial, Inc., a FINRA-registered broker-dealer ("Centaurus"). As a registered representative of Centaurus, Mr. Aldridge is permitted to receive commissions on securities transactions.

To the extent that clients wish Mr. Aldridge to implement any recommendations, the purchase or sale of any securities in conjunction with the implementation of such recommendations is made through Centaurus. Clients are free, however, to implement recommendations through any broker-dealer that they choose. The receipt of commissions for recommended products could represent an incentive for Mr. Aldridge to recommend products that pay a commission over other products, therefore creating a conflict of interest. Additionally, if a client implements the recommendation through Mr. Aldridge, the client may be limited to those products or services available through Centaurus.

Commissions earned may be higher or lower at Centaurus than other broker-dealers. Notwithstanding the fact that Mr. Aldridge is a registered representative of Centaurus, Aldridge & Co. is solely responsible for the investment advice rendered. Aldridge & Co.'s advisory services are provided separately and independently of Centaurus.

All clients are required to acknowledge disclosure of the above-mentioned conflict of interest through Aldridge & Co.'s investment management agreement.

Insurance Agent

Robert Aldridge, Principal of Aldridge & Co., is licensed with the State of California Department of Insurance to sell various forms of insurance. Mr. Aldridge has an agency relationship with several insurance companies to transact life and disability insurance business on behalf of his clients. When acting in the capacity of a licensed agent, Mr. Aldridge will receive the normal and customary commissions. Aldridge & Co. will not offset such commissions against its management fees charged.

A conflict of interest exists to the extent that Mr. Aldridge recommends the purchase of insurance products where he receives insurance commissions or other additional compensation.

All clients are required to acknowledge disclosure of the above-mentioned conflict of interest through Aldridge & Co.'s investment management agreement.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

Aldridge & Co. has adopted a Code of Ethics to prevent violations of federal and state securities laws, including the unlawful use of what is commonly called "inside information". The Code of Ethics is predicated on the principle that Aldridge & Co. and its employees owe a fiduciary duty to its clients. Accordingly, Aldridge & Co. expects all employees to act with honesty, integrity and professionalism and to adhere to federal securities laws. Aldridge & Co. and its employees are required to adhere to the Code of Ethics. At all times, Aldridge & Co. and its employees must (i) place client interests ahead of Aldridge & Co.'s; (ii) engage in personal investing that is in full compliance with Aldridge & Co.'s Code of Ethics; and (iii) avoid taking advantage of their position.

Clients and prospective clients may request a copy of Aldridge & Co.'s Code of Ethics by contacting Robert Aldridge, Principal of Aldridge & Co., at 949-859-1802.

Participation or Interest in Client Transactions

Individuals associated with Aldridge & Co. may effect securities transactions for compensation.

As stated above, Robert Aldridge is also a registered representative of Centaurus Financial, Inc., a FINRA-registered broker-dealer ("Centaurus"). To the extent that clients wish Mr. Aldridge to implement any recommendations made by him in his capacity as an investment adviser representative of Aldridge & Co., the purchase or sale of any securities in conjunction with the implementation of such recommendations is made through Centaurus. Clients are free, however, to implement recommendations through any broker-dealer that they choose. The receipt of commissions for recommended products could represent an incentive for Mr. Aldridge to recommend products that pay a commission over other products, therefore creating a conflict of interest. Additionally, if a client implements the

recommendation through Mr. Aldridge, the client may be limited to those products or services available through Centaurus.

All clients are required to acknowledge disclosure of the above-mentioned conflict of interest through Aldridge & Co.'s investment management agreement.

Individuals associated with Aldridge & Co. may buy, sell, or hold in their personal accounts the same securities that they recommend to clients.

As this represents a conflict of interest, Aldridge & Co. has enacted certain policies and procedures to ensure that its client's interests always come first.

1. An owner or employee of Aldridge & Co. shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of their employment unless the information is also available to the investing public upon reasonable inquiry. No person of Aldridge & Co. shall prefer his/her own interest to that of the advisory client.
2. All clients are fully informed that certain individuals may receive separate compensation when effecting transactions during the implementation process.
3. Aldridge & Co. emphasizes the unrestricted right of the client to decline to implement any advice rendered.
4. Aldridge & Co. requires that all individuals must act in accordance with all applicable federal & state regulations governing registered investment advisory practices.
5. Any individual not in observance of the above may be subject to termination.

BROKERAGE PRACTICES

As discussed in the section entitled "Other Financial Industry Activities and Affiliations" on page 6 of this disclosure brochure, Robert Aldridge, in his individual capacity, is a registered representative of Centaurus. Mr. Aldridge is subject to FINRA Rule 3040 which restricts registered representatives from conducting securities transactions away from their broker-dealer unless the broker-dealer provides written consent.

Clients are advised that Mr. Aldridge may be restricted to conducting securities transactions through Centaurus unless he first secures written consent from Centaurus to execute securities transactions through a different broker-dealer. Absent such written consent or separation from Centaurus, Mr. Aldridge is prohibited from executing securities transactions through any broker-dealer other than Centaurus under Centaurus' internal supervisory policies. Aldridge & Co. is cognizant of its duty to obtain best execution and has implemented policies and procedures reasonably designed in such pursuit.

Centaurus provides securities products and research services to Aldridge & Co. that are used to service the accounts of all clients. Aldridge & Co. will also receive 12b-1 distribution fees from investment companies in connection with the placement of client funds into investment companies. While Aldridge & Co. endeavors at all times to put the interest of the clients first as part of Aldridge & Co.'s fiduciary duty, clients should be aware that the receipt of such additional compensation itself creates a conflict of interest and may affect the judgment of this individual when making recommendations.

Directed Brokerage

Aldridge & Co. Directed Brokerage

As stated above, Robert Aldridge, Principal of Aldridge & Co., is separately registered as a broker-dealer representative of Centaurus Financial, Inc. ("Centaurus"), a FINRA-registered broker-dealer. While clients may execute transactions through any broker of their choice, Aldridge & Co. will recommend Centaurus to clients to effectuate securities transactions for the client; provided that this recommendation is consistent with Aldridge & Co.'s fiduciary duty to the client. Although the commission rates charged by Aldridge & Co. acting as a registered securities representative of Centaurus are competitive, they may in some cases be higher than rates charged by other firms. Any commissions or other compensation received from securities transactions is separate and distinct from Aldridge & Co.'s advisory fees. No client is obligated to use Aldridge & Co. to effect any securities transactions.

Client Directed Brokerage

Certain clients may direct Aldridge & Co. to use particular brokers for executing transactions in their accounts. With regard to client directed brokerage, Aldridge & Co. is required to disclose that Aldridge & Co. may be unable to negotiate commissions, block or batch orders or otherwise achieve the benefits described above, including best execution. Directed brokerage commission rates may be higher than the rates Aldridge & Co. might pay for transactions in non-directed accounts. Therefore, directing brokerage may cost clients more money.

Aldridge & Co. reserves the right to decline acceptance of any client account that directs the use of a broker dealer other than Centaurus, if Aldridge & Co. believes that the broker dealer would adversely affect its fiduciary duty to the client and/or ability to effectively service the client portfolio.

As a general rule, Aldridge & Co. encourages each client to compare the possible costs or disadvantages of directed brokerage against the value of custodial or other services provided by the broker to the client in exchange for the directed brokerage designation.

Trade Aggregation/Allocation

Aldridge & Co. does not aggregate client trades.

Trade Errors

Trade errors are corrected at no cost to the client. Centaurus Financial, Inc. and/or Aldridge & Co. will make good on any trade errors and the corrected trade will be executed at the price and share amount as intended.

REVIEW OF ACCOUNTS

Reviews

Investment Management accounts are reviewed quarterly and written performance reports are supplied to the clients. Accounts are reviewed based upon asset allocation strategies, performance and suitability of portfolio to the client's risk tolerance and investment objectives. All investment management clients are encouraged to discuss their needs, goals, and objectives with Aldridge & Co. and to keep Aldridge & Co. informed of any changes.

The person reviewing the accounts is Robert Aldridge, Principal of Aldridge & Co.

Reports

Clients are provided with transaction confirmation notices and summary account statements at least quarterly directly from the broker-dealer or custodian for the client's accounts. In addition, Aldridge & Co. provides Investment Management clients with quarterly reports providing a list of investments, amounts of original investment, current value of investment and rate of return information.

CLIENT REFERRALS AND OTHER COMPENSATION

Aldridge & Co. does not receive any economic benefits (e.g., sales incentives, prizes) from non-clients for providing investment advice. Aldridge & Co. does not retain solicitors to refer clients.

CUSTODY

Custody of client assets will be maintained with the independent custodian selected by the client. Aldridge & Co. will not have physical custody of any assets in the client's account except as permitted for payment of advisory fees. Clients will be solely responsible for paying all fees or charges of the custodian. Clients will authorize Aldridge & Co. to give the custodian instructions for the purchase, sale, conversion, redemption, exchange or retention of any security, cash or cash equivalent or other investment for the client's account.

Clients will receive directly from the custodian at least quarterly a statement showing all transactions occurring in the client's account during the period covered by the account statement, and the funds, securities and other property in the client's

account at the end of the period. Clients are urged to carefully review the account statement sent by the broker-dealer/custodian and to compare the account statement provided by the broker-dealer/custodian with any statements provided by Aldridge & Co.

INVESTMENT DISCRETION

For those client accounts over which Aldridge & Co. has discretion, Aldridge & Co. requests that it be provided with written authority (e.g., limited power of attorney contained in Aldridge & Co.'s Investment Management Agreement) to determine the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change or amend these limitations as required. All such amendments shall be submitted in writing.

Aldridge & Co. generally has discretionary authority to make the following determinations without obtaining the consent of the client before the transactions are effected: (1) which securities are bought and sold for the account and (2) the total amount of securities to be bought and sold. Aldridge & Co.'s authority in making investment related decisions may be limited by account guidelines, investment objectives and trading restrictions, as agreed between Aldridge & Co. and the client.

VOTING CLIENT SECURITIES

Proxy Voting

Aldridge & Co. does not vote proxies on behalf of its clients. Therefore, the client that maintains exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceeding or other type events pertaining to the client's investment assets. Aldridge & Co. and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. Clients can contact Robert Aldridge, Principal of Aldridge & Co., at 949-859-1802 if they have questions regarding a particular solicitation.

Class Action Settlements

Although Aldridge & Co. may have discretion over client accounts, it will not be responsible for handling client claims in class action lawsuits or similar settlements involving securities owned by the client. Clients will receive the paperwork for such claims directly from their account custodians. Each client should verify with their custodian or other account administrator whether such claims are being made on the client's behalf by the custodian or if the client is expected to file such claims directly.

FINANCIAL INFORMATION

Prepayment of Fees

Because Aldridge & Co. does not require or accept prepayment of more than \$500 in fees six months or more in advance, Aldridge & Co. is not required to include a balance sheet with this disclosure brochure.

Financial Condition

Aldridge & Co. does not have any adverse financial conditions to disclose.

Bankruptcy

Aldridge & Co. has never been the subject of a bankruptcy petition.

PRIVACY NOTICE

Aldridge & Co. views protecting its clients' private information as a top priority and has instituted policies and procedures to ensure that client information is private and secure. Aldridge & Co. does not disclose any nonpublic personal information about its clients or former clients to any nonaffiliated third parties, except as permitted or required by law. In the course of servicing a client's account, Aldridge & Co. may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers, etc. Aldridge & Co. restricts internal access to nonpublic personal information about the client to those persons who need access to that information in order to provide services to the client and to perform administrative functions for Aldridge & Co.. As emphasized above, it has always been and will always be Aldridge & Co.'s policy never to sell information about current or former clients or their accounts to anyone. It is also Aldridge & Co.'s policy not to share information unless required to process a transaction, at the request of a client, or as required by law. For the full text of Aldridge & Co.'s Privacy Policy, please contact Robert Aldridge, Principal of Aldridge & Co., at 949-859-1802.

CLIENT COMPLAINTS

Clients may contact Robert Aldridge at 949-859-1802 to submit a complaint. Written complaints should be sent to Aldridge & Co., 24012 Calle de la Plata, #440 Laguna Hills, CA 92653. Centaurus Financial, Inc. has no authority over, or responsibility for, the activities of Aldridge & Co. as a registered investment adviser.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Principal Executive Officer

The principal executive officer of Aldridge & Co. is Robert Aldridge.

Education Background and Business Experience

Individuals associated with Aldridge & Co. must meet certain standards set forth by the firm. Generally, Aldridge & Co. requires associated persons to have a college degree or a minimum four years related experience, have displayed a high degree of integrity in previous business background, have high standards of morals and ethics and be committed to providing quality investment advice.

Robert J. Aldridge, ChFC, CLU, (Born: 1945)

Post-Secondary Education:

California State University – Long Beach, BA (1967)

The American College, MS, Financial Services, Bryn Mawr, PA (1983)

Recent Business Background:

Aldridge & Co., Owner (1967 - Present)

Centaurus Financial, Inc., Registered Securities Principal (2001 – Present)

Examinations Passed

Series 1 – Registered Representative Examination (1971)

Series 24 – General Securities Principal Examination (1982)

Series 31 – Futures Managed Funds Examination (1994)

Series 63 – Uniform Securities Agent State Law Examination (1991)

Professional Licenses/Designations

Chartered Life Underwriter (CLU) (The American College, Bryn Mawr, PA, 1978)

Chartered Financial Consultant (ChFC) (The American College, Bryn Mawr, PA, 1982)

Certified Investment Management Analyst (CIMA) (Wharton School, University of Pennsylvania, 1990)

Insurance License (State of California Department of Insurance)

Important Information About the Chartered Financial Consultant (ChFC) Designation:

The Chartered Financial Consultant (ChFC) designation program focuses on the comprehensive financial planning process as an organized way to collect and analyze information on a client's total financial situation; to identify and establish specific financial goals; and to formulate, implement, and monitor a comprehensive plan to achieve those goals. Each ChFC® must take eight or more college-level courses on all aspects of financial planning from The American College. ChFCs must have at least three years of experience in the financial industry and studied and passed an examination on the fundamentals of financial planning, including income, tax, insurance, investment and

estate planning. Each ChFC must also complete a minimum of 30 hours of continuing education every two years.

Important Information about the Chartered Life Underwriter (CLU) Designation:

A CLU is a professional advisor in all of the areas of business and family financial security that are encompassed by life insurance. In the United States, The American College is the accredited institution that awards this designation. To become a CLU, an individual must successfully complete a comprehensive course of study and demonstrate competence by passing a series of eight, college-level examinations in several subject areas including: life insurance, pensions, taxation, finance, economics and business, and estate planning. Rigid ethical and experience requirements also must be met.

Disciplinary Information

Mr. Aldridge has no legal or disciplinary events to report.

Other Business Activities

Mr. Aldridge is also registered representative of Centaurus Financial, Inc. ("Centaurus"), a FINRA-registered broker-dealer. As a registered representative of Centaurus, Mr. Aldridge may receive commissions on securities transactions. To the extent that clients wish Mr. Aldridge to implement any recommendations made by Aldridge & Co., the purchase or sale of any securities in conjunction with the implementation of such recommendations is made through Centaurus. Compensation earned by Mr. Aldridge in his capacity as a registered representative of Centaurus is separate and in addition to advisory fees charged by Aldridge & Co. This practice presents a conflict of interest because Mr. Aldridge has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the cost to the client. However, Clients are under no obligation, contractually or otherwise, to purchase securities products through Mr. Aldridge and clients are free to implement Aldridge and Co.'s recommendations through any broker-dealer that they choose.

Mr. Aldridge is also licensed to sell insurance products. As such, Mr. Aldridge is able to implement product transactions for which he will receive separate yet typical compensation. While Mr. Aldridge endeavors at all times to put the interest of Aldridge and Co.'s clients first as part of his fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect Mr. Aldridge's judgment when making recommendations.

All clients are required to acknowledge disclosure of the above-mentioned conflicts of interest through Aldridge & Co.'s investment management agreement.

Mr. Aldridge is not engaged in any other business or occupation for compensation that provides a substantial source of his income or involves a substantial amount of his time.

Additional Compensation

Mr. Aldridge does not receive any additional compensation for providing advisory services.

Supervision

As a one-person investment advisory firm, Mr. Aldridge supervises his own advisory activities.

Performance-Based Fees

Aldridge & Co. does not receive performance-based fees.

Relationship with Issuers of Securities

Neither Aldridge & Co. nor any of its management persons have any relationship or arrangement with any issuer of securities.