

Part 2A of Form ADV: Firm Brochure

St. Louis Financial Planners Asset Management LLC
1415 Elbridge Payne Rd. Ste. 140
Chesterfield, MO 63017

Telephone: 636-532-3900
Email: info@stlfp.com
Web Address: www.stlfp.com

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St. Louis Financial Planners Asset Management LLC (STLFPAM). This brochure provides information about the qualifications and business practices of St. Louis Financial Planners Asset Management LLC.

If you have any questions about the contents of this brochure, please contact us at 636-532-3900. 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 STLFPAM is available on the SEC's website at www.adviserinfo.sec.gov. You can access this information by a unique identifying number, known as a CRD number. Our firm's CRD number is 106999.

Item 2 Material Changes

The SEC adopted "Amendments to Form ADV" in July, 2010. This Firm Brochures, dated 3/25/2011, is our new disclosure document prepared according to the SEC's new requirements and rules. As you will see, this document is a narrative that is substantially different in form and content, and includes some new information that we were not previously required to disclose.

After our initial filing of this brochure, this item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary. Furthermore, we will provide you with other interim disclosures about material changes as necessary. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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Item 4 Advisory Business

St. Louis Financial Planners Asset Management LLC provides discretionary advisory services to individuals, high net worth individuals, pension and profit sharing plans, charitable organizations, and corporations or other businesses. Adviser provides portfolio management, selection of other advisers, and active management services, and or the selection of other third-party managers.

STLFPAM provides active management advice in mutual funds, variable annuities and variable life contracts. As opposed to buy and hold strategies, active management is the process of constantly monitoring potential investments and making periodic changes to the portfolio. The management service is performed on a discretionary basis; however STLFPAM does not have custody of the client's funds or securities. STLFPAM offers different models of investment strategies in both mutual funds and variable annuities.

Utilized by Daniel Hunt and Casey Hunt

Dynamic Asset Allocation

Dynamic Asset Allocation Model seeks growth of capital with an emphasis on controlling risk through the use of multiple asset classes and the implementation of proprietary technical indicators and fundamentally driven portfolios. The Dynamic Allocation Models will utilize multiple strategies of long and intermediate term active portfolio management programs. The model employs an Asset Class Rotation strategy that buys indexed asset classes exhibiting relative strength; Tactical strategies that can seek the safety of money market when the support, resistance, and trend following models dictate; fixed income strategies; hedging strategies; and other strategies including but not limited to a momentum and contrarian model that utilized sector rotation.

Asset Class Rotation Model's objective is the growth of capital through the purchase of various indexed groups of equities called asset classes. The investment vehicles rely on fundamental analysis to determine the weighting of the individual equities in their portfolio. Through the utilization of long and intermediate term strategies, we monitor the asset classes daily and rotate into the investment style exhibiting relative strength. To control risk we rank each asset class based on relative strength performance utilizing proprietary technical indicators and seek to rotate out of the weakest and into the strongest asset classes. Unlike the Dynamic Asset Allocation strategy, the Asset Class Rotation strategy will not exit position into the money market, but rather remain fully invested.

Strategic Asset Allocation

Aggressive Growth Asset Allocation model is the highest-risk return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 100% directly must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 100%. In order to reduce the correlation of the Clients holdings to the U.S. stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation compared to investing in only U.S. Securities. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. an investment research firm.

Growth Asset Allocation model is the second to highest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 70%-90% in equity securities and 10%-30% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 10%-20% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

Moderate Growth Asset Allocation model is the next to the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 50%-70% in equity securities and 30%-50% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 30%-40% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar,

Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

Conservative Growth Asset Allocation is the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 10%-30% in equity securities and 70%-90% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 50%-60% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

In order to remain consistent with the asset allocation and portfolio holdings, each model will be reviewed and monitored on a monthly basis. Rebalancing will be utilized in order to keep the portfolio allocations within the objective guidelines. Rebalancing a portfolio will typically occur on an annual basis or no more frequent than deemed necessary.

The client, after consultation with the STLFPAM representative, may participate in more than one model at a time. Asset Allocation strategies will be executed through Ceros Financial Services (NFS – National Financial Services Clearing Agent) Platform. Both transaction and non-transaction fee no-load funds will be utilized.

Asset Allocation Models

Growth Asset Allocation Model is the highest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities at all times or in equity securities and fixed income securities through variable sub accounts. Percentages of investments are allocated to international, growth & Income, large-cap growth, large-cap value, mid-cap growth, mid-cap value, small-cap growth, small-cap value, or additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

Total Return Asset Allocation is the middle risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities and fixed

income securities at all times or in equity securities and fixed income securities through variable annuity sub accounts. Percentages of investments are allocated to international, growth & income, large-cap growth, large-cap value, mid-cap growth, mid-cap-value, small-cap growth, small-cap value, and additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

Balanced Asset Allocation model is the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities and fixed income securities at all times or in equity securities and fixed income securities through variable annuity sub accounts. Percentages of investments are allocated to international, growth & income, large-cap growth, large-cap value, mid-cap growth, mid-cap value, small-cap growth, small-cap value, and additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align mode objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

Utilized by Timothy Hunt

STLFPAM also provides active management services under the Full Discretion Advisory Agreement whereas the Client appoints and provides STLFPAM with general power of attorney to allow STLFPAM to undertake such investment supervisory services as STLFPAM deems appropriate for the Client in one or more management programs or mutual funds. Client appoints STLFPAM to select management program(s), third party manager(s), and program signal, appoint sub-advisors, and from time to time reallocate funds among such program(s) and/or third-party manger(s) according to clients predetermined risk and objectives. STLFPAM effectuates buys/sells on a discretionary basis.

Income Portfolio model is used to seek both current income and modest growth of capital from a portfolio of both fixed and income securities and equity securities. A portfolio of corporate bonds, US Government obligations, income producing securities, equities, exchange traded funds (ETF's), no-load and NAV load mutual funds are used.

Dynamic Asset Allocation Model seeks growth of capital with an emphasis on controlling risk through the use of multiple asset classes and the implementation of proprietary technical indicators and fundamentally driven portfolios. The Dynamic Allocation Model will utilize multiple strategies of long and intermediate term active portfolio management

programs. The model employs an Asset Class Rotation strategy that buys indexed asset classes exhibiting relative strength; Tactical strategies that can seek the safety of money market when support, resistance and trend following models dictate; fixed income strategies; hedging strategies; and other strategies including but not limited to a momentum and contrarian model that utilizes sector rotation. Variable annuities utilize mutual funds and index funds (separate accounts).

Asset Class Rotation Model's objective is the growth of capital through the purchase of various indexed groups of equities called asset classes. The investment vehicles rely on fundamental analysis to determine the weighting of the individual equities in their portfolio. Through the utilization of long and intermediate term strategies, we monitor the asset classes daily and rotate into the investment style exhibiting relative strength. To control risk we rank each asset class based on relative strength performance utilizing proprietary technical indicators and seek to rotate out of the weakest and into the strongest asset classes. Unlike the Dynamic Asset Allocation strategy, the Asset Class Rotation strategy will not exit position into the money market, but rather remain fully invested.

Variable Annuity (Sub accounts) Models:

Growth Asset Allocation Model is the highest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities at all times or in equity securities and fixed income securities through variable sub accounts. Percentages of investments are allocated to international, growth & Income, large-cap growth, large-cap value, mid-cap growth, mid-cap value, small-cap growth, small-cap value, or additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

Total Return Asset Allocation is the middle risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities and fixed income securities at all times or in equity securities and fixed income securities through variable annuity sub accounts. Percentages of investments are allocated to international, growth & income, large-cap growth, large-cap value, mid-cap growth, mid-cap-value, small-cap growth, small-cap value, and additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

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Mutual Fund Accounts:

Aggressive Growth Asset Allocation model is the highest-risk return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 100% directly must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 100%. In order to reduce the correlation of the Clients holdings to the U.S. stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation compared to investing in only U.S. Securities. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc.

Growth Asset Allocation model is the second to highest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 70%-90% in equity securities and 10%-30% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 10%-20% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

Moderate Growth Asset Allocation model is the next to the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest

50%-70% in equity securities and 30%-50% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 30%-40% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar

Conservative Growth Asset Allocation is the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 10%-30% in equity securities and 70%-90% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 50%-60% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

In order to remain consistent with the asset allocation and portfolio holdings, each model will be reviewed and monitored on a monthly basis. Rebalancing will be utilized in order to keep the portfolio allocations within the objective guidelines. Rebalancing a portfolio will typically occur on an annual basis or no more frequent than deemed necessary.

The client, after consultation with the STLFPAM representative, may participate in more than one model at a time. Asset Allocation strategies will be executed through Ceros Financial Services (NFS – National Financial Services Clearing Agent) Platform. Both transaction and non-transaction fee no-load funds will be utilized.

As of March 2011, we were actively managing \$86,300,000 of clients' assets on a discretionary basis.

St. Louis Financial Planners Asset Management LLC has been in business since 1996

Principal Owners:

Timothy D. Hunt 33.3%
Daniel E. Hunt 33.3%
Casey D. Hunt 33.3%

Executive Officers:

Timothy D. Hunt – President
Daniel E. Hunt - Vice-President
Casey Hunt – Chief Compliance Officer

Item 5 Fees and Compensation

Fee Schedule for Daniel E. Hunt and Casey D. Hunt

Dynamic Asset Allocation & Asset Class Rotation

| | |
|-----------------------|----------------------|
| \$50,000 and less | 2.50% of the account |
| \$50,001 - \$100,000 | 2.25% of the account |
| \$100,001 - \$500,000 | 2.00% of the account |
| \$500,001 and over | 1.75% of the account |

Strategic Asset Allocation & Socially Conservative Asset Allocation

| | |
|-----------------------|----------------------|
| \$100,000 and less | 1.75% of the Account |
| \$100,001 - \$250,000 | 1.50% of the Account |
| \$250,001 and over | 1.25% of the Account |

Fee Schedule for Timothy D. Hunt, Daniel Hunt & Casey Hunt

Variable Annuity Asset Allocation

| | |
|-----------------------|---------------------|
| \$100,000 and less | .70% of the Account |
| \$100,001 - \$250,000 | .60% of the Account |
| \$250,001 and over | .50% of the Account |

Fee Schedule for Timothy D. Hunt

Dynamic Asset Allocation & Asset Class Rotation

| | |
|-------------------------|----------------------|
| \$250,000 and less | 2.50% of the Account |
| 250,001 - \$500,000 | 2.25% of the Account |
| \$500,001 - \$1,000,000 | 2.00% of the Account |
| \$1,000,001 and over | 1.75% of the account |

Income Portfolio

1.75% of the Account

Percentages are calculated on market value.

STLFPAM uses a platform of no-load, NAV load mutual funds, index funds, "C" and "H" shares (12b1) funds, and exchange traded funds (ETF's). STLFPAM retains the right to negotiate fees at its own discretion. Fees are calculated and payable in arrears, they are deducted quarterly or semi-annually depending on the advisory agreement the client signed. STLFPAM will deduct the fees from the clients' assets. STLFPAM's Advisory Agreement may be terminated by either party upon five (5) days written notice. Fees will be prorated to the amount of days in which the client received STLFPAM service. Clients are under no obligation to act on the investment adviser recommendations. The client is under no obligation to effect the transaction through the licensed broker-dealer STLFPAM has recommended and has the option to purchase investment products through other brokers or agents that are not affiliated with STLFPAM. There is a \$14.95 charge for equity trades and \$18.95 for mutual fund trades. For equity trades that are 10,000 shares or more there will be a 1 ½ cents per share additional fee for each trade. Retirement accounts have an annual maintenance fee of \$40.00 and a liquidation fee of \$75.00 when account is closed.

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

Investment Advisers of STLFPAM do not charge performance-based fees.

Item 7 Types of Clients

STLFPAM provides investment advice to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, Corporations or business entities other than those listed above.

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

Method of Analysis

St. Louis Financial Planners Asset Management, LLC utilizes both technical and fundamental analysis as its primary method of analysis. Technical Analysis is the study of the market action itself as measured by the market price and volume. Market charts are used to identify the dominate trends in the major market indices and asset classes. Our discipline then ranks the asset classes and/or sectors and invests in those exhibiting the highest returns relative to risk. The investment vehicles used are no-load index mutual funds that rely on fundamental analysis in the weighting of the individual security holdings. Fundamental analysis is a method of security valuation that examines a company's financials including sales, earnings, growth potential, assets, debt, etc.

The Income Portfolio uses both fundamental analysis and in-depth individual company research for its security selection.

Investment Strategies

Dynamic Asset Allocation – Aggressive Growth

Dynamic Asset Allocation – Growth

Dynamic Asset Allocation – Moderate Growth

Dynamic Asset Allocation – Income and Growth

Dynamic Asset Allocation – Conservative Growth

Dynamic Asset Allocation – Intermediate

Dynamic Asset Allocation – Tactical Asset Allocation (Variable Annuity)

Income Portfolio

Strategic Asset Allocation

Socially Conscious Asset Allocation

Variable Annuity Asset Allocation

Risk of Loss

Because our strategies invest in equity securities, there naturally exists a risk of loss based on market conditions. In addition to lowering that risk and volatility through the use of income producing fixed instruments, we also take a different approach to manage risk. Our Dynamic Asset Allocation strategies will also exit 100% to U.S. Treasury Money Market by selling its equity holdings when our discipline issues a sell signal. These defensive measures seek to minimize the risk of investing in the stock market.

The Income Portfolio purchases individual securities, there always exist the risk of unexpected developments that can affect the value of the securities, such as unexpected losses, reduced earnings projections, adverse changes to market conditions, and a whole myriad of other market factors that can cause downward pressure on the price of individual securities, which in turn can result in loss of value in a short period of time.

Item 9 Disciplinary Information

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

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

The Principals of STLFPAM are licensed as registered representatives of Ceros Financial Services, a licensed broker/dealer with FINRA, SEC, and various regulatory agencies. As a result, varying conflicts of interest may arise. STLFPAM's investment adviser representatives are registered with Ceros Financial Services to sell investment products and therefore, receive commissions. Representatives do recommend that clients implement investment advice through Ceros Financial Services. It is estimated the officers will spend 80% of their time supervising investment advisor activities and products and 20% of their time selling securities and investment products.

The Principal Executive Officers of STLFPAM are also Principal Executive Officers of St. Louis Financial Planners, Inc., a financial planning and registered investment adviser. St. Louis Financial Planners, Inc. and STLFPAM share the same office space.

Representatives of STLFPAM also sell life insurance, long term care insurance and annuities through Brokerage Unlimited and The Blair Agency for which they receive a commission. Representatives sell cd's through EverBank and a commission is paid.

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

This Code establishes rules of conduct for all employees of STLFPAM and is designed to protect, among other things, the confidentiality of client information and establish compliance procedures ensuring best practices. The Code is based upon the principal that STLFPAM and its employees owe a fiduciary duty to their clients to conduct their affairs as to avoid (i) serving their own personal interests ahead of clients, including their personal securities transactions, in such a manner as to avoid serving their own personal interests ahead of clients, (ii) not taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards are maintained by STLFPAM continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

STLFPAM and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that STLFPAM has an affirmative duty of utmost good faith to act solely in the best interest of its clients.

STLFPAM and its employees are subject to the following specific fiduciary obligations when dealing with clients:

- The duty to have a reasonable, independent basis for the investment advice provided.

- The duty to obtain best execution for a client's transactions where the Firm is in a position to direct brokerage transactions for the client.
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs and circumstances.
- A duty to be loyal to clients.

In meeting its fiduciary responsibilities to its clients, STLFPAM expects every employee to demonstrate the highest standards of ethical conduct for continued employment. Strict compliance with the provisions of the Code shall be considered a basic condition of employment. STLFPAM's reputation for fair and honest dealings with its clients has taken considerable time to build. This standing could be seriously damaged as the result of even a single securities transaction being considered questionable in light of the fiduciary duty owed to our clients.

A copy of STLFPAM's Code of Ethics is available upon request.

Item 12 Brokerage Practices

The client in its advisory agreement with STLFPAM grants to STLFPAM or designated sub-advisor discretionary authority over the account with regard to the securities to be bought or sold in the account and the amount of the securities to be bought or sold.

STLFPAM has chosen Ceros Financial Services as their broker/dealer based upon its determination of capable execution, reasonable commissions, and selection of appropriate mutual funds. If any product, research or services are provided to STLFPAM, such are used to service and benefit all client accounts. STLFPAM suggestion of a broker-dealer and/or mutual fund distribution company is under taken by STLFPAM to attempt to obtain the best price and execution, but STLFPAM cannot guarantee that STLFPAM's suggestions will result in the best price and execution. STLFPAM's investment adviser representatives are registered representatives with Ceros Financial Services. Often STLFPAM's representatives recommend that clients implement investment advice through Ceros Financial Services. STLFPAM believes that Ceros offers a full range and quality of broker services including execution capability, commission rates, and financial responsibility. To the extent that STLFPAM may benefit from clients implementing investment advice through Ceros, a potential conflict of interest may arise. STLFPAM does, however, reserve the right to recommend other broker-dealers and/or mutual fund distribution companies.

STLFPAM utilizes Orion as an independent source of data gathering and report generation. There is no additional cost to clients for this service. STLFPAM receives a benefit in the form Ceros paying the price of postage for mailing of the quarterly

statements. STLFPAM receives a benefit for the cost of the initial development of its internet website, as well as ongoing monthly maintenance fees from Ceros Financial Services. Clients should be aware that such arrangements with Ceros could present a potential conflict of interest.

STLFPAM compensates representatives of St. Louis Financial Planners, Inc. for clients utilizing their service. This referral arrangement does not result in any additional charge or fee to the client from STLFPAM.

Item 13 Review of Accounts

All accounts will be reviewed on a daily basis. Individual investments will be monitored continuously and reviewed weekly or more frequently if necessary. Overall account positions will be reviewed on a quarterly basis to determine their ability to meet client goals and objectives. Actions that may trigger changes in accounts include, but are not limited to, relevant financial events, market activity or indicators from STLFPAM's proprietary technically derived signals.

Individual funds, annuities, and fund groups selected by clients are reviewed periodically by principals of STLFPAM. If investment policies of any investment vehicle become inappropriate for the STLFPAM's management program, clients are advised.

In addition to regular audit procedures performed by administrative staff or outside services, reviews may be conducted by officers of STLFPAM and designated employees. Currently that includes, Tim, Dan, and Casey Hunt. Accounts will be reviewed for performance, client objectives and matching accuracy of all account balances, as well as, reviewing client's current objectives. There are no assignment limits for any associate of STLFPAM.

In addition to the monthly and/or quarterly reports provided by the custodian of the account, clients will receive quarterly statements showing aggregate market value of the account and annual performance reports. Clients are urged to carefully compare the statements they receive from STLFPAM and the custodian and contact STLFPAM if they have any questions. A market report discussing general market conditions and management viewpoint will be sent as advisers feel necessary.

Item 14 Client Referrals and Other Compensation

St. Louis Financial Planners, Inc. refers clients to STLFPAM for discretionary advisory services. STLFPAM advisers will provide portfolio management, selection of other advisers, and active management service.

Item 15 Custody

STLFPAM does not have custody of client's accounts. The custodian for client accounts is primarily National Financial Services and various mutual funds and insurance companies.

Item 16 Investment Discretion

The client in its advisory agreement with STLFPAM, grants to STLFPAM or designated sub-advisor discretionary authority over the account to place trades in the account without contacting the client prior to each trade to obtain the clients permission. Our discretionary authority includes the ability to determine the security to buy or sell and to determine the amount of the security to buy or sell. Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Item 17 Voting Client Securities

STLFPAM does not have the authority to vote client securities. Clients will receive their proxies or other solicitations directly from their custodian or fund. Clients may contact STLFPAM regarding any solicitation they receive regarding their account.

Item 18 Financial Information

STLFPAM does not require or solicit prepayment of fees.

STLFPAM has not been the subject of a bankruptcy petition at any time.