

Select Portfolio Management, Inc.

**26800 Aliso Viejo Parkway, Suite 150
Aliso Viejo, California 92656**

(949) 975-7900

April 10, 2012

This brochure provides you information about the qualifications and business practices of Select Portfolio Management, Inc. If you have any questions about the contents of this brochure, please contact us at (949) 975-7900. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about Select Portfolio Management, Inc. is available on the SEC’s website at www.adviserinfo.sec.gov.

SUMMARY OF MATERIAL CHANGES

This brochure replaces and supersedes Form ADV, Part II. In the future, this section will summarize material changes that have been made to this brochure since the date of its last version.

3/28/2012 Portfolio Management Services are for the most part now being offered through affiliate Select Money Management, Inc. which has its own Firm Brochure. Financial Industry Affiliations have been expanded to include General Insurance Agency Affiliate-SPM Insurance Services, Inc. No further material changes have been made.

TABLE OF CONTENTS

	<u>Page</u>
Item 1 Cover Page	i
Item 2 Summary of Material Changes	ii
Item 3 Table of Contents	iii
Item 4 Advisory Business	1
Item 5 Fees and Compensation	8
Item 6 Performance-Based Fees and Side-By-Side Management	12
Item 7 Types of Clients	12
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.....	12
Item 9 Disciplinary Information.....	16
Item 10 Other Financial Industry Activities and Affiliations	16
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	17
Item 12 Brokerage Practices	18
Item 13 Review of Accounts.....	19
Item 14 Client Referrals and Other Compensation	19
Item 15 Custody	20
Item 16 Investment Discretion	20
Item 17 Voting Client Securities.....	20
Item 18 Financial Information.....	20
Item 19 Additional Information.....	21

INTRODUCTION

In this brochure, references to “we,” “us,” “our,” or “our firm” refer to Select Portfolio Management, Inc. Individuals who serve as our directors, officers, and employees are referred to as our “representatives.” Our firm’s clients and prospective clients are referred to as “you,” “your” or “our clients.”

This brochure contains important information. We encourage you to read it carefully and to ask questions if there is any information that you do not understand. The format and content of this brochure have been prepared based on the instructions to Form ADV, Part 2A, which is prescribed for use by registered investment advisors under federal and state securities laws and related rules. Form ADV, Part 2A supersedes Form ADV, Part II.

ADVISORY BUSINESS

Our Owners and Principals

Our firm was established by Carin R. Amaradio and commenced business in 1993. Ms. Amaradio serves as our Chief Executive Officer, and Chief Compliance Officer. Anthony J. Amaradio serves as President and Chief Strategist for the firm. They each have over 30 years of experience financial services business.

General Investment Advisory Services for Individuals

We offer general investment advisory services for individuals. These services include developing investment strategies based on your current and anticipated future financial needs. Our representative will meet with you, gather financial data, and discuss your current financial situation and future financial goals. You need to furnish us with all current information about your financial and investment circumstances. Your information, as well as our recommendations and advice, are confidential.

Based on your information, we will give you our recommendations for various investment products and services. You are always at liberty to follow or disregard our recommendations, in whole or in part. We will advise you, but you must make your own decision whether or not to make any investment.

After developing and recommending your investment strategy, we will periodically contact you for a financial review, typically at least annually. Our financial review will take into consideration the original investment strategy, new investments you have made, changes in your financial circumstances or goals, and any changes in the tax laws or other general economic conditions that may affect your current investment strategy. If requested, we will provide you with interim financial reviews. Typically, we do not provide periodic reports for our general investment advisory clients.

In most situations, we do not charge a fee for our general investment advisory services for individuals. We do not impose a minimum dollar value of assets or other conditions in order for you to utilize the general investment advisory services for individuals.

General Investment Advisory Services for Businesses

We offer general investment advisory services specifically tailored to the needs and special circumstances of businesses, including their pension and retirement plans. These services are generally provided in conjunction with other professionals and include investment management services for pension and profit sharing plans, 401(k) plans, 403(b) plans, SEP IRA plans, SIMPLE IRA plans, non-qualified deferred compensation plans, asset protection plans, executive salary continuation plans, cross-purchase and stock redemption agreements and employee advisory services.

We also provide general investment advisory services specifically tailored to the needs of a trustee or other fiduciary, including but not limited to, someone meeting the definition of “fiduciary” under the Employee Retirement Income Security Act of 1974 (“ERISA”) or an employee benefit plan subject to ERISA.”

We will periodically contact you for a financial review. Interim financial reviews are available as you may request. We may provide regular reports regarding your accounts, depending on your needs. We do not impose a minimum dollar value of assets or other conditions for these services.

Fees for our general investment advisory services for businesses are negotiated on a case-by-case basis after our assessment of the complexities of the services to be rendered.

Timing Services

We offer six timing service programs, which are organized across three broad timing service categories: Fee-Based Portfolio Management Services, Fee-Based Asset Allocation Management Services, and Fee-Based Individual Equity and Debt Asset Management Services.

As of December 31, 2011, we managed accounts having, in the aggregate, approximately \$2,332,281.41 on a discretionary basis.

Fee-Based Portfolio Management Services

We offer fee-based portfolio management services to our clients who have investments in no-load mutual funds, exchange traded funds (ETF's), and unit investment trusts (UIT's). Fees are calculated as a percentage of the total assets under management and are billed quarterly. Transaction costs are not incurred when purchasing or selling no-load mutual funds. However, a transaction cost may be incurred when an ETF or UIT is purchased or sold in the account. Currently, we offer the following fee-based portfolio management service program.

Custom Portfolio Creation and Passive Portfolio Management Program – We offer a Custom Portfolio Creation and Passive Portfolio Management Program to our clientele. This program is based on a proprietary asset allocation methodology developed by us. Your portfolio is created based on our understanding of your specific financial circumstances, future financial needs, investment goals, return objectives, and risk tolerance. Once a portfolio is created, decisions regarding the type, amount, and holding period of any investment are made in accordance with your individual circumstances. Portfolios are monitored (i.e., passively managed) for changes in quality, management, fiduciary, and other fundamental circumstances. Portfolios in this program are not actively managed. We will act in a limited discretionary capacity to

choose when to execute any trade. A minimum of \$25,000 in assets is required to participate in the Custom Portfolio Creation and Passive Portfolio Management Program. We may waive such minimum at its sole discretion.

Fee-Based Asset Allocation Management Services

We offer fee-based asset allocation management services to our clients who have investments in mutual funds, variable annuities, and variable life insurance products. Assets are typically domiciled at a mutual fund company or are held in sub-accounts at a life insurance company. Fees are calculated as a percentage of the total assets under management, are billed quarterly, and are adjusted depending on whether the underlying investment product is classified as “front-load”, “no-load”, or “deferred-load”. Typically, no transaction costs are incurred (a) to purchase or sell no-load mutual funds, (b) to exchange funds within a mutual fund family, or (c) to exchange sub-accounts within a variable annuity and/or variable life insurance product. However, an exchange fee may be charged by custodians of investment companies that are deducted from the proceeds of liquidation before reinvestment. Currently, we offer the following four fee-based asset allocation management service programs.

Strategic Asset Allocation Management Program – We offer a Strategic Asset Allocation Management Program to our clientele who have investments held at mutual fund companies, or who have equity sub-accounts in variable annuities and/or variable life insurance products. This program is based on a proprietary strategic asset allocation model which has been exclusively developed by us. The strategic asset allocation model is based on fundamental and technical analysis of the markets. Fundamental analysis is used to answer the question of where to invest, while technical analysis assists in answering when to invest in those markets. When a buy or sell signal is generated by the strategic asset allocation model, an exchange is processed between funds within the mutual fund family and/or individual series within the separate accounts of a variable annuity or variable life insurance contract. A minimum of \$25,000 in assets is required to participate in the Strategic Asset Allocation Management Program. We may waive such minimum at our sole discretion.

Sector Mutual Fund Asset Management Program – We offer a Sector Mutual Fund Asset Management Program to our clientele who have investments in sector mutual funds. This program is based on a proprietary model that has been exclusively developed by us. The sector model is designed to capitalize on changing market trends and cyclical rotations by investing in various industries or sectors at times when market and/or seasonal indicators signal optimal investment opportunity. The sector model incorporates the technical data from three separate timing models. In addition, we utilize a price/strength ranking system to identify the probable sector leaders in given market conditions. We have access to over thirty-five individual market sectors within the seven general sector categories of Utilities, Technology, Consumer, Cyclical, Financial Services, Health Care and Natural Resources. In addition, these funds can be purchased throughout the trading day while most mutual funds are purchased at the day’s closing price. A minimum of \$25,000 in sector mutual fund assets are required in order to participate in the Sector Mutual Fund Asset Management Program. We may waive such minimum at our sole discretion. Sector management is subject to increased market volatility.

Bull & Bear Asset Management Program – We offer a Bull & Bear Asset Management Program to our clientele who have investments in Rydex mutual funds. This program is based on a proprietary bull & bear model which has been exclusively developed by us. The bull & bear model is designed with the goal

of identifying market trends and taking advantage of periods of market advances by taking a long position in funds mirrored to the S&P 500 index and the NASDAQ 100 index. During periods of market weakness, the model takes a short position while using the same types of funds. The model can also take a long or short position of a fund that mirrors the price movement of the 30-year Treasury bond and a neutral strategy consisting of money market investing is used during a sideways market trend. The bull & bear model is based on fundamental and technical analysis of market trends. In order to identify market trends, we use a three tier screening system. Our client's portfolio can be structured on a tax-deferred basis to eliminate current capital gains and ordinary income taxation under certain circumstances. A minimum of \$25,000 in Rydex mutual fund series trust assets are required in order to participate in the Bull & Bear Asset Management Program. We may waive such minimum at our sole discretion.

Model Portfolio Selection and Active Portfolio Management Program – We offer a Model Portfolio Selection and Active Portfolio Management Program to our clientele. This program is based on a proprietary strategic asset allocation methodology we developed. We manage several asset allocation models, each designed to meet a specific goal ranging from long-term capital appreciation to capital preservation. We assist you with selecting one of its asset allocation models based on our understanding of your specific financial circumstances, future financial needs, investment goals, return objectives, and risk tolerance. Each asset allocation model is actively managed based on fundamental and technical analysis of the markets. Fundamental analysis is used to answer the question of where to invest, while technical analysis assists in answering when to invest in those markets. We, while acting in a limited discretionary capacity, will choose when to execute any trade. A minimum of \$150,000 in assets is required to participate in the Model Portfolio Selection and Active Portfolio Management Program. We may waive such minimum in our sole discretion.

Fee-Based Individual Equity and Debt Asset Management Services

We offers fee-based individual equity and debt management services to our clients who have investments in individual equity securities, warrants, corporate debt securities, municipal securities, United States government securities, and option contracts on securities.

Individual Stock and Bond Management Program - The program is designed to provide investment advice on securities currently held by our client as well as making additional recommendations on the purchase and sale of other securities that we determine are suitable to your investment objectives. We will use both technical and fundamental analysis to determine which securities are to be purchased and/or held and when such securities should be liquidated. In connection with performing these services we may obtain and use information and data from a wide variety of public and private sources (including, but not limited to financial publications, industry research materials and other materials prepared by parties other than us). While we will not use any such information or data if we have reason to believe it to be inaccurate, we will not independently verify, and cannot guarantee, such information and data, and make no representations or warranties with respect to any reports or statements prepared for us for our clients to the extent such reports or statements are based on such information or data or analysis thereof. A minimum of \$25,000 in assets is required to participate in the Individual Stock and Bond Management Program. We may waive such minimum in our sole discretion.

Provisions That Apply To All Timing Service Programs

Account Opening – We may hold your account assets in a cash position until an investment timing signal is generated to invest your account in the signaled position. You must provide us with accurate account numbers in order to start our service. We will have no responsibility for losses if you provide us with incorrect or incomplete account numbers with the mutual fund company, brokerage firm, clearing firm or other custodian that holds your account.

Limited Power of Attorney – You will open a securities account at the broker-dealer of your choice and provide necessary paperwork and limited power of attorney for our firm to manage your securities. We are not responsible for the broker-dealer's services or if, for whatever reason, the broker-dealer does not allow us to act on your behalf under the limited power of attorney you grant to us. You are the legal and beneficial owner of all securities held in your account. We will only have the ability to effect transactions pursuant to the limited power of attorney.

You may enter orders on your own behalf without our permission but you need to notify us within a reasonable period of time of any and all transactions you make on your own. Any transactions you initiate are your responsibility.

Agreement – If you choose to use one of our timing service programs you will execute one of the following agreements: (a) the Fee-Based Portfolio Management Services Agreement, (b) the Fee-Based Asset Allocation Management Services Agreement, or (c) the Fee-Based Individual Equity and Debt Asset Management Services Agreement (each referred to as the "Agreement"). We will be retained on a limited discretionary basis and will be authorized to determine and direct execution of portfolio transactions. You will receive a confirmation of each purchase and sales transaction that occurs within your account(s) directly from the companies or custodians that hold your investments. Only you have full discretionary authority to liquidate shares, other than an exchange based on a signal generated by one of the timing service models. We do not take custody of client funds or securities.

Termination – You may terminate the Agreement, without charge, upon delivery to us of a written notice of termination within five (5) business days from the date of your execution of the Agreement. After the five (5) day period, you may terminate the Agreement upon written notice to us. We may also terminate the Agreement upon written notice to you.

The termination's effective date will be the date of receipt of the written termination notice. Termination of the Agreement will not affect any purchases of investment or insurance products made by you based on advice or recommendations made by our firm.

Upon termination, we will prorate our fees to the termination's effective date and, if applicable, will refund to you (or your account) any unearned portion of our fees. Your funds will remain in the position they are in on the date of the termination and we shall have no further responsibilities with respect to the account(s) or positions in the account(s).

Third-party Wrap Fee Programs

We may also recommend various wrap fee programs that are available to you. These programs will allow you to utilize the services of various private portfolio managers for the purpose of investment and portfolio management of individual stocks, bonds and other securities. We will provide investment supervisory services to you regarding the selection and use of these programs and will monitor their performance based on reporting provided by the individual portfolio managers.

Since portfolio fees and fees for brokerage services will vary based on the wrap program, the size of the account being managed and the clearing firm at which trades are transacted, we will seek to assure that you are charged a competitive rate according to the size of your account being managed. We will be compensated for these investment supervisory services by sharing in the portfolio management fee that is charged to you. The amount of this fee will vary depending on the wrap program selected. You shall receive a wrap fee program brochure or disclosure statement describing the program, the services provided and the schedule of fees.

If you participate in wrap fee programs you will receive performance reports, account value and billing information at least quarterly and in some cases monthly depending on the program used. You will be contacted periodically for a financial review with interim reviews available at your request.

The minimum value of assets required to participate in the wrap programs will vary according to the program selected. Minimums are specified in the brochure or disclosure statement of the firm providing the service.

Investment Advice through Consultation Not Included In Above Services

We offer five investment advice programs, which are not considered part of General Investment Advisory Services or Timing Services, and are organized across two broad investment advice categories: Financial Planning Services and Financial Organization Services.

Financial Planning Services

We offer Financial Planning Services if you wish to have a better understanding of: (a) your current financial situation, (b) your goals, needs, and risks, and (c) the potential consequences of taking (or not taking) certain actions. We have four financial planning service programs:

Retirement Planning Program - We will provide you with an assessment of your current financial situation and make certain recommendations relating to your goals. Components of a Financial Plan may include:

- Net Worth Summary
- Cash Flow Summary
- Current Asset Allocation Summary
- Asset Allocation Recommendation
- Retirement Plan Summary
- College Funding Plan Summary
- Emergency Fund Plan Summary
- Survivor Income Plan Summary
- Disability Income Plan Summary
- Long-Term Care Plan Summary

Comprehensive Financial Planning Program - We will provide you with an in depth analysis of your current financial situation, as well as detailed recommendations relating to your goals. Components of a Comprehensive Wealth Plan may include:

- Detailed Net Worth Statement
- Detailed Cash Flow Report
- Current Asset Allocation Summary
- Asset Allocation Recommendation
- Detailed Retirement Analysis/Plan
- Detailed College Funding Plan
- Detailed Survivor Income Plan
- Detailed Disability Income Plan
- Detailed Long-Term Care Plan
- Major Purchase Analysis & Plan
- Probability Analysis
- Monte Carlo Analysis
- Multiple Scenario Analysis
- Action Plan

Advanced Wealth Planning Program. The Advisor will provide the Client with an in depth analysis of the Client's current financial situation, as well as detailed recommendations relating to the Client's goals. Components of an Advanced Wealth Plan may include all the various components of option "***b Comprehensive Financial Planning Program***", ***plus:***

- Asset Protection Needs Analysis
- Tax Reduction Consultation¹
- Estate Plan Consultation¹
- Charitable Gifting Consultation¹
- Succession Plan Consultation¹

Legacy Planning Program – We will provide you with an in depth process that assists in developing your personal legacy plan. The Legacy Plan process is intended to clarify the values, vision and purpose for the next stages of your life. In addition, the tools provided in the process will maximize the potential outcomes that you desire. The desirable outcomes may be any of the following: creating a positive impact on the family and community or providing clarity with financial affairs, estate planning, and philanthropy. Components of the Legacy Plan may include a personalized:

- Life Vision
- Legacy Statement
- Balance Wheel
- Turning Points Profile
- Legacy Plan Strategy
- Legacy Implementation Plan

¹Consultation is SPM's CERTIFIED FINANCIAL PLANNER™ professional proactively collaborating with Tax Consultant & Estate Planning attorney to gain their input and review of client's Advanced Wealth Plan.

Specialized Planning Program - We will provide you with analysis and advice on a specific issue or topic.

Financial Organization Services

We offer the following financial organization services:

Financial Organization Program - We and/or an authorized representative of ours will provide you with financial organization services, which may include: (a) in-office SPM Life Organizer file creation and document organization services, and/or (b) in-home filing system creation and file organization services.

If you elect to participate in the financial planning program, the comprehensive wealth planning program, the legacy plan, the specialized planning program, or the financial organization program, you will be required to execute a “Financial Planning and Organization Services Agreement” with us. The Financial Planning and Organization Services Agreement may be terminated by you, without penalty, upon delivery of a written notice of termination to us within five (5) business days from the date of your acceptance of the Financial Planning and Organization Services Agreement. After the five (5) business day period, the deposit is non-refundable and either party may terminate the Financial Planning and Organization Services Agreement upon written notice to the other by certified or registered mail. Cancellation of the Financial Planning and Organization Services Agreement will not affect any purchases of securities or other investment products made by you based on advice or recommendations made by us.

FEES AND COMPENSATION

Fee Schedule for our Custom Asset Allocation Creation and Passive Portfolio Management Program

<u>Annual Fee</u>	<u>Account Value</u>
1.60%	\$ 25,000.00 - \$ 150,000.00
1.50%	\$ 150,000.01 - \$ 500,000.00
1.30%	\$ 500,000.01 - \$1,000,000.00
1.00%	\$1,000,000.01 - \$2,000,000.00
0.80%	\$2,000,000.01 - and above

Fee Schedule for Model Asset Allocation Selection and Active Portfolio Management Program

<u>Annual Fee</u>	<u>Account Value</u>
2.00%	\$ 150,000.00 - \$ 500,000.00
1.80%	\$ 500,000.01 - \$1,000,000.00
1.40%	\$1,000,000.01 - \$2,000,000.00
1.00%	\$2,000,000.01 - and above

Fee Schedule for All Fee-Based Asset Allocation Management Services

Fee Schedule for No Load Products

<u>Annual Fee</u>	<u>Account Value</u>
2.75%	\$ 25,000.00 - \$ 150,000.00
2.50%	\$ 150,000.01 - \$ 500,000.00
2.00%	\$ 500,000.01 - \$1,000,000.00
1.75%	\$1,000,000.01 - and above

Fee Schedule for Front Load Products

<u>Annual Fee</u>	<u>Account Value</u>
2.50%	\$ 25,000.00 - \$ 150,000.00
2.25%	\$ 150,000.01 - \$ 500,000.00
1.75%	\$ 500,000.01 - \$1,000,000.00
1.50%	\$1,000,000.01 - and above

Fee Schedule for Products With A Deferred Load

<u>Annual Fee</u>	<u>Account Value</u>
1.75%	\$ 25,000.00 - \$ 150,000.00
1.50%	\$ 150,000.01 - \$ 500,000.00
1.00%	\$ 500,000.01 - \$1,000,000.00
.50%	\$1,000,000.01 - and above

Fee Schedule for Individual Stock and Bond Management Program

<u>Annual Fee</u>	<u>Account Value</u>
1.50%	\$ 25,000.00 - \$ 150,000.00
1.00%	\$ 150,000.01 - \$ 500,000.00
.75%	\$ 500,000.01 - \$1,000,000.00
.50%	\$1,000,000.01 - and above

We may negotiate our fees taking into consideration such things as the size of your account, the number of managed portfolios, your relationship with other clients, the length of our relationship with you, the complexity of your personal circumstances, the composition of your portfolio, the complexity of investment strategies, the frequency of desired meetings or special reporting, and other factors that affect our cost of providing services for you. If you, your family, or related persons also have accounts under our management, those accounts may be aggregated for fee calculation purposes. For these reasons, our fees may vary among clients who may be in similar circumstances. Other investment advisors may charge higher or lower fees for comparable services.

Billing - Any fee for utilizing one of our timing services will be billed quarterly according to one of the fee schedules as outlined above. The fees charged by us may be higher than fees charged by other advisors for similar services. We will seek to assure that you are charged a competitive rate according to the size of the account being managed.

We reserve the right to (i) invoice on an annual period or semi-annual period at its sole discretion and charge the appropriate fee for such period; (ii) negotiate fees at its sole discretion; and (iii) modify the fee schedule upon a minimum of thirty (30) days prior written notice to you.

For fee-based portfolio management services, fees are billed quarterly in advance and are automatically withdrawn from the account. In any partial calendar quarter, the fee will be pro-rated based on the number of days your account was open during the quarter. For the purpose of determining the fee, the market

value of assets under management shall be measured on the last day of the month immediately preceding the billing quarter.

For fee-based asset allocation management services and fee-based individual equity and debt management services, fees are computed at the end of each calendar quarter and are billed directly to you. Fees are due within ten (10) days of the date billed. At your request and upon written authorization, the quarterly fee may be paid directly from one of your accounts. If you fail to pay your fee within thirty (30) days of the date billed, we reserve the right to charge interest at the highest rate allowed by law and we shall be entitled to reimbursement of our cost of collecting such fees and interest, including reasonable attorney fees, on all outstanding fees and interest due us.

Transaction and Exchange Fees – Besides our investment management fees, you will pay all brokerage charges related to securities transactions for your account and, if applicable, any custodian's fees. During a trade or exchange, a mutual fund company may charge a transaction or exchange fee and deduct it from your proceeds before reinvestment. You should carefully review the prospectuses of your investments so you are aware of the specific amount of the transaction or exchange fee that may be charged. You agree not to cause or permit any trade or exchange to be made in your account(s) that we manage that is inconsistent with our recommendations. Any acts inconsistent with the foregoing shall relieve us of any and all liability.

Other Third-party Fees – If you invest in mutual funds, exchange-traded funds, and other funds or investments that are managed or administered by third-parties, you will be paying additional fees and charges to others that are in addition to our fees. For example, if you purchase mutual fund shares or a variable insurance product, then you will incur additional fees and charges at the fund level. Each mutual fund's or variable insurance product's prospectus or offering memorandum describes these fees and expenses. The additional fund-level fees may include, but are not limited to, a management fee, brokerage and custodian fees, other fund expenses, mortality and expense risk charge or possible distribution fee. If the product imposes a sales charge, you may pay an initial or deferred sales charge. We are not affiliated with any other service provider or securities issuer, and we do not receive compensation from source other than the fees we charge, described above. Before investing in a fund, you should consider the total cost of fund-level fees, our advisory fees, and any transaction-related commissions or charges. You may choose to invest in mutual funds, variable insurance products, or other securities directly, without our services.

Fee Schedule for Financial Planning Services

Initial Plan Fee – Before any services are initiated, we will provide you with a quote for such services, as outlined. All terms and conditions relating to initial financial planning services are outlined in the Financial Planning and Organization Services Agreement. The quote will be for the completion of an initial financial plan or an initial financial organization project. Any required travel expenses (e.g. plane flights, hotel, rental car, etc.) will be quoted as needed. An initial plan/project is considered to include the time required to gather, assemble, and present the finished written plan to you. It will not include time spent on updates, revisions or changes requested by you or recommended by us. (See “*Ongoing Plan Fees*”)

Generally, all fees determined as a flat fee. A deposit of 50% of the quoted flat fee plus any applicable travel expenses is due and payable at the time the “Financial Planning and Organization Services Agreement” is signed. At our discretion, fees may be determined as an hourly fee. If fees for services are charged on an hourly basis, the number of hours and aggregate amount of fees outlined in the Financial Planning and Organization Services Agreement are only estimates. In this instance, we will charge an upfront retainer fee, which will be applied to future hours worked, equal to 50% of the total cost estimated to complete the task. We will not perform hours of services or charge aggregate fees that exceed such estimates without first providing you with written notice and an opportunity to reject additional services and related fees. Any balance is due at the time the completed plan is delivered and presented to you.

Ongoing Plan Fees - We recommend that plan updates and revisions be considered at least semi-annually and will periodically contact you to discuss changes that may necessitate a plan update. Interim financial plan updates are available as you request. The revision will be based on the original plan and will take into account any changes in your financial, tax and legal risk management circumstances and needs. You will be quoted an update fee based on the time anticipated to review, adjust, update and present you the updated plan. All terms and conditions relating to plan update services are outlined in the Financial Planning and Organization Services Agreement. Fees for subsequent plan updates are not due until the beginning of the term in which such services are to be delivered.

Fee Schedule for Financial Organization Services

Initial Project Fees – Before any financial organization-related services are initiated, we will provide you with a quote for such services. All terms and conditions relating to financial organization services are outlined in the Financial Planning and Organization Services Agreement. The quote will be for the completion of a financial organization project. A project is considered to include the time required to gather, organize, and present the finished deliverable to you. It will not include time spent on continuous updates, revisions or changes requested by you or recommended by us. (See “*Ongoing Fees*”)

Generally, all fees determined as a flat fee and are payable in advance. At our discretion, fees may be determined as an hourly fee. If fees for services are charged on an hourly basis, the number of hours and aggregate amount of fees outlined in the Financial Planning and Organization Services Agreement are only estimates. In this instance, we will charge an upfront retainer fee, which will be applied to future hours worked, equal to 50% of the total cost estimated to complete the task. We will not perform hours of services or charge aggregate fees that exceed such estimates without first providing you with written notice and an opportunity to reject additional services and related fees. Any balance is due at the time the completed plan is delivered and presented to you.

Ongoing Project Fees – Interim financial organization updates are available at your request. You will be quoted an update fee based on the time anticipated to gather and organize your financial information. All terms and conditions relating to financial organization update services are outlined in the Financial Planning and Organization Services Agreement. Fees for subsequent updates are not due until the beginning of the term in which such services are to be delivered.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not charge performance-based fees. We do not charge fees based on a share of your account's capital gains or the capital appreciation of assets held in your account.

TYPES OF CLIENTS

We provide portfolio management services to individuals, high net worth individuals, businesses, corporate pension and profit-sharing plans, trusts and estates, charitable institutions, foundations, endowments.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis

When advising you about your investments or managing your account, we typically use several methods to analyze the securities that we may select for your investment portfolio, including fundamental and technical analysis. We also consider cyclical factors affecting some industries and companies more than others. We also consider factors such as the strength of the company's or mutual fund's management team.

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the economic well-being of a company, as opposed to movements of its market price. In the course of our analysis, we will review a company's financial statements and consider factors including, but not limited to, the company's historical financial condition, prior operating results and trends, its projected revenue growth, its competitive advantages and disadvantages, the anticipated demand for its current and future products or services, the age and nature of its assets, and other factors affecting the company's anticipated results from future operations. Past performance does not assure similar future performance. A company's fundamental value can be adversely affected by many factors unrelated to its actual operating performance.

Technical analysis is another method to evaluate potential investments. Unlike fundamental analysis, technical analysis does not analyze the company's value, but instead analyzes the movement of stock prices in the market, both individually and within an industry or sector of the economy. Technical analysis studies the supply and demand in the market in an attempt to determine historical and future trends. Notwithstanding favorable market price movements, a company's financial condition and other unique factors can adversely affect its value. Technical analysis relies upon stock movements and volume reflected in historical stock charts, often compared with various market benchmarks.

Cyclical factors are more relevant to some industries and some company's stocks than others. A cyclical industry or stock is generally more sensitive to our economy's business cycle. Business cycles are the recurring and fluctuating levels of economic activity that our economy experiences over a period of several years. The five stages of the business cycle are growth (expansion), peak, recession (contraction),

trough and recovery. Business cycles vary in frequency, magnitude and duration. The revenues for cyclical industries and stocks are generally higher in periods of economic prosperity and expansion and lower in periods of economic downturn and contraction. Some industries and stocks tend to be counter-cyclical. The revenues for counter-cyclical industries and stocks tend to be negatively correlated to the overall state of the economy. A counter-cyclical stock's price will tend to move in a direction that is opposite to the general economic trend.

We obtain information from a number of sources, both public and by purchase, including financial news papers and magazines, inspection of corporate activities, research materials prepared by third-parties, corporate rating services, annual reports, prospectuses, reports filed with the SEC, and company press releases. We believe these resources for information are reliable and regularly depend on these resources for making our investment decisions.

We use a variety of investment strategies depending on your circumstances, financial objectives and needs. We may recommend implementing one or more of the following investment strategies: long-term purchases (held at least a year), short term purchases (held less than a year), trading (held less than 30 days), margin transactions (purchase of a security on credit extended by a securities company), and option writing (selling an option).

We may recommend implementing these strategies using stocks, bonds, mutual funds (held directly or held within variable annuities or life insurance products), municipal securities, options contracts, futures contracts and other types of investments. We often recommend mutual funds of different kinds to promote portfolio diversification within various asset classes, such as industry sectors, domestic/international, or equities/bonds. We may recommend periodic purchases, sales, and exchanges of those mutual fund shares within mutual fund families and between different mutual fund families when there are changes in your needs, market conditions, or economic developments.

Investment Risks and Rewards

Investing in securities involves risks of loss that you should be prepared to bear. Securities, mutual funds, variable products, equity index annuities and other types of investments all bear different types and levels of risk. These risks will be discussed with you to determine the investment objectives that will guide our investment decision-making for your account. Upon request, we can discuss with you the types of investments and investment strategies that we believe may tend to reduce these risks in light of your personal circumstances and financial objectives.

For our market timing services, we use a proprietary methodology to determine when to buy/sell mutual funds or other securities for our separately managed accounts. No assurance can be given that any fee-based portfolio management service program will result in profitable investments for you or that you will not incur losses. The results of any fee-based portfolio management service program cannot be guaranteed and do not take into consideration the timing of your purchase of any particular security, how long you have held the security, your other investments, or the specific tax consequences of the sale or purchase of any securities. All risk of gain or loss in the investments and all expenses of the account(s) are your sole responsibility.

We provide no guarantee regarding the timing of a trade or exchange. While we attempt to execute trades within twenty-four (24) hours of a signal or decision, delays could occur. Processing time delays incurred by the mutual fund companies, insurance companies, brokerage firms, clearing firms and custodians are not our responsibility and in such event we assume no responsibility for any possible losses. In the event that a trade or exchange is missed with material losses resulting there from, we assume no responsibility for such losses. You will be required to waive any claim to specific, direct or consequential damages and agree that your sole remedy shall be either (1) the refund of the quarterly fee and cancellation of their Agreement or (2) the account(s) will be managed without charge for a term to be determined by us.

While we design investment strategies to provide appropriate investment diversification, some investments have significantly greater risk than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Our investment strategies seek to balance risks and rewards to achieve investment objectives. You need to ask questions about investment risks you do not understand. Our representatives would be pleased to discuss them with you.

We strive to render our best judgment on behalf of our clients. Still, we cannot assure you that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment advisor but is not a reliable predictor of future performance. We continuously strive to provide outstanding long-term investment performance, but many economic market variables beyond our control can affect the performance of an investment portfolio.

Generally, some of the more common investment-related risks that may affect your investment portfolio include:

- Business risks are associated with a particular company or industry. For example, start-up companies carry greater business risks than established companies. Companies developing new technologies carry greater business risks than manufacturers of well established or widely used products and services.
- Financial risks are often associated with the ability of a company to raise capital or finance its operations, as well as its ability to repay indebtedness. Highly leveraged companies face greater financial risks than well-capitalized companies.
- Market risks are related to the effects of economic, political, natural disasters, or other events on the price of a publicly-traded stock, bond, exchange-traded fund, or other securities. This type of risk is typically affected by extrinsic factors that often are not related to a particular company's financial condition, performance, or circumstances. For example, investment speculation can materially affect market prices.
- Liquidity risks are associated with an investor's ability to readily convert a security or other asset into cash. Generally, there is greater liquidity for securities that are publicly traded on stock exchanges or trading facilities that match buy and sell orders. Privately offered securities may be highly illiquid because there is little or no trading or market activity.

- Concentration risks result from a lack of investment diversification, which may be expressed in terms of geography, industry, or economic sector. For example, mutual funds typically invest in a large number of different companies, typically lowering the risk that one or a small number of those companies experience a significant loss.
- Options are complex, derivative securities that involve special risks. Option contracts expire at a stated maturity date and have no further value. Unlike traditional securities, the value of an option and the return from holding an option varies with the value of the underlying security from which it derives and other factors.
- Interest-rate risks are associated with changes to investment prices due to increasing or decreasing interest rates. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Inflationary and deflationary risks are associated with the purchasing power of the dollar, which is affected by broad economic, monetary, governmental policies, and the balance of supply and demand for products and services.
- Reinvestment risks are typically related to fluctuations in the potential interest rate at which future investment proceeds may have to be invested. For example, reinvestment risks may increase during periods of falling interest rates. This risk primarily relates to bonds and other fixed income securities.
- Currency risks are primarily associated with foreign investments. For example, a company's earnings in a foreign country may be affected by fluctuations in the value of the dollar against that foreign currency. Similarly, the investment return of a foreign security may be affected by changes in currency exchange rates.

Types of Investments

We provide investment advice with respect to a wide range of investments, including no-load mutual funds, indexed funds, exchange traded funds (generically referred to as “*funds*”), unit investment trusts, stocks, bonds, and other types of investment securities. Advice may also be given to clients with interests in partnerships investing in other business activities such as real estate investment trusts (REITs), and various types of insurance products that may include investment features.

We often offer advice about separately managed accounts by unaffiliated investment advisors, mutual funds, exchange-traded funds, and variable annuities. Our representatives are happy to answer any questions you may have about these kinds of investments and investment programs.

Mutual funds of all types charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, shareholder servicing, other fund expenses, and sometimes a distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge. These separate mutual fund fees are disclosed in each fund's current prospectus, which is available from the mutual fund and, upon request, can be provided by us.

Consequently, for any type of mutual fund investment, it is important for you to understand that you are directly and indirectly paying two levels of advisory fees and expenses: one layer of fees at the fund level and one layer of advisory fees and expenses to us. Generally speaking, most mutual funds may be purchased directly, without using our services, without incurring advisory fees. Moreover, many mutual funds pay shareholder servicing fees (12b-1 fees) to brokerage firms and their registered representatives in consideration of their services to the fund's shareholders. As noted below, our representatives are registered representatives of Securities Equity Group and, accordingly, may receive this type of compensation with respect to clients who invest in these funds.

Most mutual funds offer several "classes" of their shares which may be purchased by different types of investors or investors with different investment objectives. These are also described in the mutual funds' prospectuses. Depending on your investable assets, investment objectives, and time horizon, different classes may be more appropriate. We would be pleased to discuss the available classes of mutual fund shares that may be available, the different purposes for which they may be purchased, and the differences in commissions and charges that are associated with each share class.

Variable annuities are highly complex financial products offered by insurance companies. Investments in a variable annuity contract are subject to both general market risk and the insurance company's credit risk. These and other risks are described in the variable annuities' prospectuses. Variable annuities are regulated under both securities and insurance laws and related rules and regulations. Variable annuities offer various benefits and features which may or may not have value to you depending on your circumstances. Like other types of investments, commissions are paid for the purchase of variable annuities and there may be substantial surrender charges. These commissions surrender charges, and other expenses are disclosed in the prospectus. Like mutual funds, insurance companies charge a variety of fees and charges against the assets invested in the separate accounts of their policy holders. As noted above, this means that there are two layers of advisory fees incurred – one layer by the insurance company and one layer to us for advisory services.

DISCIPLINARY INFORMATION

We have no legal or disciplinary events to disclose. As a registered investment advisor, we are required to disclose to you all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm or the integrity of our management.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We are affiliated by common ownership with Select Money Management, Inc., another investment advisor registered with the SEC. We may refer you to Select Money Management for its advisory services. While our referrals are not specifically compensated, we will indirectly benefit from any services provided to you by Select Money Management. Its services, fees, and additional important information are disclosed in its own firm brochure, which you will receive before engaging its advisory services.

We are also affiliated by common ownership with Securities Equity Group, a securities broker-dealer. Securities Equity Group is a member of FINRA and SIPC. Securities Equity Group acts as a fully disclosed introducing for National Financial Services, LLC, who holds client assets and executes transactions for client accounts. We are not affiliated with National Financial Services, LLC. For more information about Securities Equity Group and its brokerage services, see the discussion below under the heading, “*Brokerage Practices*.”

We are also affiliated by common ownership with SPM Insurance Services, Inc. a General Insurance Agency. We may refer you to SPM Insurance Services, Inc. for insurance services available through that firm. While our referrals are not specifically compensated, we will indirectly benefit from any services provided to you by SPM Insurance Services, Inc.

Carin R. Amaradio owns and manages Select Portfolio Management, Inc., Select Money Management, Inc., Securities Equity Group and SPM Insurance Services, Inc. In addition, Anthony Amaradio, Daniel Amaradio, Mark Goldsmith, David Jones, Semir Amin, Darren Whissen and Carin Amaradio are all registered representatives of broker-dealer Securities Equity Group and can earn commissions on securities transactions and 12b-1 fees for mutual funds that may be recommended made by them in their capacity as a representative of our firm.

Commissions earned on variable insurance products are typically higher and in some instances substantial compared to commissions earned on mutual funds or other securities. Because of this, there exists the potential conflict of interest in the recommendation made by the representative that serves both as an advisor representative and a registered representative earning a commission on the products that are recommended by him or her. You are under no obligation to implement investment and insurance recommendations through Securities Equity Group or through any insurance companies with which representatives and/or employees of our firm are contracted. Commissions may be higher or lower at Securities Equity Group than at other broker-dealers. Full disclosure is provided to you prior to executing any transaction. Our firm and our representatives receive no commission if you choose to purchase securities through a broker-dealer other than Securities Equity Group.

Anthony Amaradio, Daniel Amaradio, Mark Goldsmith, David Jones, Semir Amin, Darren Whissen and Carin Amaradio are also investment advisor representatives of affiliate Select Money Management, Inc. and can earn management fees on assets under management that they may have recommended in their capacity as a representative of our firm.

Compensation paid to any one of these affiliated companies indirectly benefits the other companies. These relationships create a potential conflict of interests in our recommending the services of these affiliated companies. We address these potential conflicts by disclosing these relationships and the compensation we will earn or benefit from when you engage their services.

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

We have adopted a Code of Ethics that is intended to help us put your interests first, and above our own interests. The Code of Ethics sets forth the standards of business conduct that our firm and our representa-

tives are expected to follow. The Code of Ethics also imposes certain reporting requirements with which particular individuals associated with or employed by us must comply. We will provide a copy of our Code of Ethics to you upon request.

Participation or Interest in Client Transactions

As a general proposition, our firm and our representatives may recommend to you securities that are available through Securities Equity Group, member FINRA and SIPC. Comparable securities are available through other individuals or broker-dealers at competitive rates.

Neither our firm nor our representatives (i) as principal, buys securities for themselves from or sells securities they own to a client; or (ii) as broker or agent for any person other than a client, effects transactions in which your securities are sold to or bought from a brokerage customer; or (iii) recommends to clients that they buy or sell securities or investment products in which applicant or a related person has some financial interest.

Our firm and our representatives may purchase a security recommended to you for their account; however neither our firm nor our officers, representatives and/or employees may purchase a security for their own account or the account of an immediate family member strictly for purposes of recommending or purchasing the same security for clients, and then shortly thereafter profitably selling the security for their own account or for the account of their immediate family.

BROKERAGE PRACTICES

If you engage our timing or investment management services, our firm will act on a limited discretionary basis to determine and direct execution of your portfolio transactions. We will arrange for the execution of securities transactions for your account through brokers or dealers that we reasonably believe will provide best execution. In selecting a broker or dealer, we may consider, among other things, the broker or dealers execution capabilities, reputation and access to the markets for the securities being traded. We generally will seek competitive commission rates but will not necessarily attempt to obtain the lowest possible commission for transactions for your account.

Our representatives typically refer our clients seeking securities brokerage services to our affiliate, Securities Equity Group. This recommendation is based upon, among other things, the level of service and efficiency that is available by using the affiliated broker-dealer and the administrative convenience associated with using the same individuals in their different capacities. Securities Equity Group is an introducing broker-dealer for National Financial Services, LLC, through whom most securities transactions (other than those held within a variable insurance contract) are cleared. Securities Equity Group does not hold any customer accounts and is not a market-maker in any security.

Consistent with obtaining best execution, transactions for your Account may be directed to brokers in return for researching services furnished by them to our firm. Such research generally will be used to service all of our clients, but brokerage commissions paid by you may be used to pay for research that is not used in managing your Account. We may, in our discretion, cause your account to pay brokers a commission greater than another qualified broker might charge to effect the same transaction where we

determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

REVIEW OF ACCOUNTS

Reviews and Reviewers – Reviewers include: Anthony Amaradio, Daniel Amaradio, Mark Goldsmith, David Jones, Semir Amin and Darren Whissen. All representatives are expected to provide review services as specified by us and the number of accounts assigned to each representative will vary. Many accounts are reviewed periodically by more than one representative. You are contacted periodically for reviews and interim financial reviews are available as you request.

Account Reporting – Statements showing the account value in these investments are prepared and forwarded to our clients quarterly along with the billing information. You will also receive a confirmation of each purchase and sales transaction that occurs within your account directly from the companies or custodians that hold your investments. You will be contacted periodically for a financial review with interim reviews available as you request.

CLIENT REFERRALS AND OTHER COMPENSATION

As described above under the heading “*Advisory Business*,” we are a solicitor for, and may recommend that you engage the services of, a third-party investment advisor through a wrap fee program. If you do, we will receive a portion of the wrap fee you pay to the program sponsor. Our solicitor’s compensation is described in the sponsor’s wrap fee brochure and in a solicitor’s disclosure statement. You will not pay the program sponsor any additional fees by virtue of our having made the referral and we do not charge any additional fees with respect to your assets invested through a wrap fee program. We will seek to assure that the fees charged to our clients by program sponsors are competitive and consistent with fees charged to that firm’s other clients.

From time to time we may engage solicitors to market our services. We pay solicitors for their services, as described in a separate solicitor’s brochure that you should have received, together with a copy of this firm brochure, when the solicitor introduced you to our firm. The amount of compensation we pay solicitors is typically a share of the fees you pay us. The amount may vary by solicitor and may vary over time. Our method of computing the solicitor’s compensation is described in the solicitor’s brochure.

We also make available for purchase a personal financial organizer (“*Organizer*”), currently marked as the “SPM Life Organizer.” You are not obligated to purchase the Organizer under any circumstances. The Organizer consists of one (1) portable file box (size may vary depending on the make and model, but generally will not be larger than 14”W X 14”D X 14”H), up to 25 hanging file folders with pre-printed tabs, and one (1) SPM Life Organizer Client workbook. We may, in our discretion, offer to assist you with the setup, implementation, and management of the Organizer as part of its advisory services. Pricing for the Organizer will vary depending the make and model of the box. The cost of the Organizer is nonrefundable.

Compensation paid or received in connection with these relationships creates potential conflicts of interest that you should carefully consider in evaluating and acting upon our recommendations.

CUSTODY

While we do not have physical custody of the assets held in your account, if you engage our investment management services, then we will have authority to bill your custodian for our fees and, upon billing, to receive our fees by deducting them directly from your account as described under the heading above, “*Fees and Compensation*.” This fee-deduction authority gives us the ability to obtain money from your account and so is deemed to constitute custody of your account assets.

You should receive at least quarterly statements from the broker-dealer, bank, mutual fund transfer agent, or other qualified custodian you select to hold your account assets. We urge you to carefully review your custodian’s periodic statements and to compare those records with the reports that we periodically provide to you. Our reports are not intended to replace or supersede your custodian’s periodic statements and may vary based on accounting procedures, reporting dates, or valuation methodologies, as noted under the heading above, “*Review of Accounts*.”

INVESTMENT DISCRETION

As explained under the heading above, “*Advisory Business*,” in our investment management agreement you grant us discretionary authority over your account, including authority to select the identity and amount of securities to be bought or sold for your benefit and risk. Our discretion will be exercised in accordance with your stated investment objectives. You may provide us with written investment guidelines or restrictions to limit our discretionary authority or we may develop an investment policy statement with you.

VOTING CLIENT SECURITIES

Many of the companies who issue the securities held in your investment account will solicit proxies for the election of directors and voting on questions presented to shareholders at annual or special meetings. We do not vote proxies on your behalf. You are responsible for voting proxies. Proxy solicitation materials will be forwarded directly to you by your account custodian. If you have any questions about a particular proxy voting matter, please do not hesitate to ask.

FINANCIAL INFORMATION

We have no financial liabilities, obligations, or commitment that impairs our ability to meet our contractual and fiduciary commitments to you. We have not been the subject of a bankruptcy proceeding.

ADDITIONAL INFORMATION

Privacy Policy

Advisor's Commitment to Client Privacy - Select Portfolio Management, Inc. has a policy of protecting the confidentiality and security of information we collect about you and prospective client contacts. We will not share nonpublic information about any client ("Information") with third parties, outside of the professionals we work with, including attorneys, accountants, and financial advisors, etc., and the professionals the client works with, including attorneys, accountants, and financial advisors, etc. (collectively, "Professional Advisors"), to the extent necessary for them to assist with the your representation.

Why We Collect and How We Use Information – We limit the collection and use of information to the minimum required in order to deliver superior service to you and your Professional Advisors. Such service includes debriefing, analysis, planning, implementation, management, etc., and administering our business.

How We Gather Information – We get most Information directly from you or your Professional Advisors, from your responses to requests for information, from your tax returns, and from various other sources as part of our due diligence investigations. You may also periodically send us information for purposes of certain transactions or for management purposes. This information may be collected in person or electronically. We may verify this information or get additional information from consumer reporting agencies or public sources. This Information may relate to your finances, employment, avocations or other personal characteristics, as well as transactions and interactions with or through Professional Advisors, our firm, or others.

How We Protect Information – Our employees are required to protect the confidentiality of Information and to comply with established policies. They may access Information only when there is an appropriate reason to do so, such as for your planning, implementation, or management needs. We also maintain physical, electronic and procedural safeguards to protect Information, which comply with all applicable laws. Employees who violate the our Privacy Policy are subject to disciplinary process.

Disclosure of Information – We may disclose any Information to or as directed by your Professional Advisors or when we believe it necessary for the conduct of its business, or where disclosure is required by law. For example, Information may be disclosed for audit purposes, to the our attorneys or other professionals, or to law enforcement and regulatory agencies to help our firm prevent fraud. In addition, we may disclose Information to third party service providers (i) to enable them to provide business services for our firm or your Professional Advisors, such as performing computer related or data maintenance or processing services for the Advisor or your broker or investment advisor, (ii) to facilitate planning and transactions on your behalf, (iii) to assist our firm in creating new structures and transactions, etc., for your use or the use of Professional Advisors, or (iv) for credit review and reporting purposes. Except in those specific, limited circumstances, without your consent, we will not make any disclosures of Information to other companies who may want to sell their products or services to you. For example, we do not sell your name to a catalogue company or telemarketer. It is our policy to require all third parties, other than your Professional Advisors, that are to receive any Information to sign strict confidentiality agreements.

Former Customers - Even if you are no longer a customer, our firm's Privacy Policy will continue to apply.

To Whom This Policy Applies - This Privacy Policy applies to services provided by our firm in the United States, used primarily for personal, family, or household purposes (not business purposes).

Access to and Correction of Information –You are welcome to review any file we may maintain for personal information. If you notify us that any Information is incorrect, we will review it. If we agree, we will correct any related records. If we do not agree, you may submit a short statement of dispute, which we will include in future disclosures of the disputed Information. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.

Further Information – We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. We believe that this notice complies with a recently enacted Federal law regarding privacy. You may have additional rights under other foreign or domestic laws.