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ADV Brochure – Annual Update

January 2012

This brochure provides information about the qualifications and business practices of Rhoads Lucca Capital Partners, LP. If you have any questions about the contents of this brochure, please contact us at 888-895-1212. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by state securities authorities.

Rhoads Lucca Capital Partners, LP is a registered investment adviser with the SEC. Registration does not imply a certain level of skill or training.

Additional information about Rhoads Lucca Capital Partners, LP also is available on the SEC's website at www.adviserinfo.sec.gov.

Summary of Material Changes

There are no materials changes. This ADV Part2 Brochure contains the same information as the last amended version dated January 2011.

Please read through the entire brochure.

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Advisory Business

Rhoads Lucca Capital Partners L.P. (RLCP) whose General Partner is Rhoads Lucca Capital Management, Inc., provides discretionary money management services to: mutual funds.

Autopilot Mutual Funds® - This is a family of mutual funds established and managed by the Limited Partnership, RLCP. These funds are available to the public; and are distributed through Northern Lights Distributors, LLC, are administered by Gemini Fund Services LLC and First National Bank of Omaha is the custodian. All fees to clients are built into the fund structure. There is currently only one client fund; Autopilot Managed Growth Fund.

RLCP currently only offers investment supervisory services to one client, but in the future may provide investment supervisory services to additional public and private fund clients.

As of December 31, 2011, RLCP had \$20,298,167 under management in the Fund(s).

Fees and Compensation

RLCP provides discretionary money management services as the Adviser of the Autopilot Mutual Funds®. All fees to clients are built into the funds. These funds are available to the public; and are distributed through Northern Lights Distributors, LLC, are administered by Gemini Fund Services LLC and First National Bank of Omaha is the custodian.

Mutual Fund clients are generally required to have \$10 million of assets before RLCP will accept the fund as a client.

Performance-Based Fees and Side-by-Side Management

RLCP does not offer or participate in any performance based investment portfolios.

Types of Clients

Our clients are primarily:

- Individuals
- Other Investment Advisors
- Other Mutual Funds

Autopilot Managed Growth Fund is a no-load¹, multi-cap equity fund. The minimum initial investment to open an account is \$10,000 for regular accounts and \$4,000 for retirement plans and automatic investment plans. The minimum subsequent investment is \$1,000, \$500 for retirement plans and \$50 for automatic investment plans. The minimum initial and subsequent investments may be waived by the adviser. Lower minimum initial and additional investments may also be applicable if the shares are purchased through a financial intermediary. There is no minimum investment requirement when you are buying shares by reinvesting dividends and distributions from the Fund.

Methods of Analysis, Investment Strategies, and Risk of Loss

In addition to Charting, Fundamental and Technical Analysis, and Quantitative and Qualitative Screening techniques done in house and subscribed to from outside providers will be used to help identify securities and/or groups of securities in which positions may be taken.

RLCP obtains information from a wide variety of publicly available sources. RLCP investment professionals do not have, and do not claim to have, sources of inside or non-public information. Among the sources of information used are subscription analysis

services and database services that provide current and historical pricing data, screening tools, market analysis and portfolio recommendations.

Futures, options and other derivatives may be used for hedging and managing long or short exposure.

Mutual fund investing involves risks. Some mutual funds have more risk than others. The risks associated with each fund are explained more fully in each fund's prospectus. The investment return and principal value of an investment will fluctuate, and shares, when sold, may be worth more or less than the original cost. There is no assurance a portfolio's objectives will be achieved. Keep in mind that asset allocation and diversification strategies do not assure a profit or protect against loss in declining markets.

You should consider the investment objectives, risks, charges and expenses carefully before investing.

Disciplinary Information

No disciplinary actions have been taken against any of RLCP Limited Partners.

Other Financial Industry Activities and Affiliations

John Rhoads and David Lucca are principals in Rhoads Lucca Capital Management, Inc. which is the General Partner of RLCP and an S.E.C.-Registered Investment Adviser (IARD #801-27938)

David Lucca independently runs www.uspfa.org, which provides general financial information on a subscription basis to commercial airline pilots.

RLCP is a Limited Partnership whose General Partner (1% interest) is Rhoads Lucca Capital Management, Inc. Principal owners are the same for both entities. No clients have an ownership interest in either.

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

Code of Ethics

- RLCP and all of its advisors and employees will abide by honest and ethical business practices at all times. These practices include, but are not limited to:
- Placing clients' priorities and benefits first.
- Helping clients identify their tolerance for investment risk and guiding them towards investments that do not exceed their identified risk tolerance.
- Helping clients determine an acceptable level of account withdrawals to maintain their stated long-term lifestyle goals, as applicable, based on information provided by clients.
- Investing client assets according to the stated investment guidelines and strategies of their selected portfolio models and promptly informing clients of any changes in those guidelines and strategies.
- Providing complete, honest and regular communication to clients on the status of their accounts and the relative performance of the RLCP funds.
- Maintaining confidentiality of client information. (RLCP Privacy Policy)
- Fully informing clients when a potential conflict of interest exists that may influence the advice being sought.
- Not placing discretionary investment orders without having clients' written authorization of discretionary power.
- Not inducing trading in a customer's account that is excessive in size or frequency in view of the financial resources and character of the account ("churning").
- Not borrowing money or securities from, or lending money or securities to, a customer.
- Not investing in any unregistered or unlawful securities.

- Not placing, or recommending that a client place, an order to buy or sell a security through an agent that is not properly licensed or is otherwise inappropriate.
- Reporting promptly to a member of the RLCP management team any violations of the “Code of Ethics” and “Privacy Policy.”
- Not making any political contributions to any clients or potential clients, including friends/family/business partners of those clients, per the SEC ruling of Pay-to-Play.
- All individuals employed by RLCP must act in accordance with all applicable Federal and State regulations governing registered investment Advisory practices.

Participation In Client Transactions

Staff at RLCP and their immediate family members may have personal accounts managed by the General Partner of RLCP and/or RLCP or may invest in the public investment fund, Autopilot Managed Growth FundTM. These accounts are managed in the same way as client accounts and in no way are given any preferential treatment over client accounts, except that the management fees may be waived or reduced as to these investors by RLCP.

Further, it is the expressed policy of RLCP and its General Partner that:

- No person employed by us shall put their own interest or that of family members above that of its clients.
- All individuals employed by us must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- No person employed by us may purchase or sell any security for personal gain prior to a transaction(s) being implemented for a client.

No person employed by us may buy or sell securities for their personal portfolio(s) where their decision is substantially derived by reason of their employment, unless the information is also available to the investing public on reasonable inquiry.

Insider Trading Is Prohibited

All individuals associated with RLCP (including partners, staff, consultants and any independent contractors) are strictly prohibited from trading for their own accounts, or accounts of their customers, friends, family or relatives, based on their possession of material non-public information. Further, all of the above persons are strictly prohibited from communicating any non-public information to other persons, other than any personnel involved in the matter who have a legitimate need to know such information and the firm's outside advisers retained to handle the matter.

We obtain information from a wide variety of publicly available sources. RLCP's Advisers do not have and shall not claim to have sources of inside or private information. In the normal course of our business, it would be highly unlikely that any of our partners or staff would have access to non-public information. Therefore, it is not feasible, given the nature of our operations, to develop specific procedures to prevent insider trading. We must rely on our broad policy, which is in full force and effect at all times, should there be a situation in which RLCP possesses material non-public information.

- **Autopilot Mutual Funds® – Buy/Sell requirements for RLC employees:** All employees who wish to buy or sell any shares of a fund in the Autopilot Mutual Funds family must get approval before doing so. Once approved, the funds will be purchased/sold at the pre-determined time period per our company policy.

Privacy Policy

We will keep confidential all information concerning client identity, financial affairs, and investments, except as the client otherwise agrees or is as required by law.

Brokerage Practices

RLCP chooses brokers using criteria such as commission rates charged, quality and quantity of execution services and processes offered, quality of reporting and user interface(s) for order entry and reporting. We do not enter into or use “soft dollar” arrangements when selecting a broker unless such benefits are incidental to the services offered by the brokerage firm. Nor do we have any financial interest in selecting one broker over another.

Best execution for all trades is an objective of the applicant. Trades are monitored and evaluated on a regular basis. True “best execution” on trades is not able to be assured.

RLCP may manage investment funds, from time to time, that may trade in the same securities. Should this occur, a conflict may be created that we will deal with according to its practices of trying to make sure that no one fund is favored over another.

Trading conflicts may occur but they will be avoided whenever possible. Conflicts may occur when trading securities and/or futures in different client accounts. Whenever possible, when trading the same security or futures contract for more than one account, average pricing will try to be obtained so no account is disadvantaged. If average pricing is not available, then every effort will be made to avoid trading more than one account at the same time in the same security.

Despite best efforts, conflicts may occur. When they do occur, they will be noted in the trade records. As long as efforts were made to avoid the conflict, no customer reimbursement will be made for incidental conflicts.

Review of Accounts

The RLCM Investment Committee is composed of all our Investment Professionals. They meet in person, by teleconference or email exchange at least once per week, or more if needed, to review client investments and discuss general client advice. We generally follow the philosophies of diversification, long term horizon, and managing the expenses involved in making investments. Each client has direct access to any of our Investment Professional.

You may call at any time during normal business hours to talk with an Investment Professional about your account, financial situation, investment needs, or related issues.

Client Referrals and Other Compensation

RLCP has entered into agreements with other Registered Investment Advisors who will act as an Investment Advisor Representative (IAR). The IAR's will be paid out of the revenue received by us and not as an additional fee to clients introduced by the IAR.

Custody

RLCP is considered to have custody of client funds because we are responsible for authorizing payments from client accounts. Financial controls have been implemented with independent 3rd party administrators to help protect client assets against misappropriation.

Autopilot Mutual Funds® - This is a family of mutual funds established and managed by the Limited Partnership, RLCP. These funds are available to the public; and are distributed through Northern Lights Distributors, LLC, are administered by Gemini Fund Services LLC and First National Bank of Omaha is the custodian. All fees to clients are built into the funds.

Investment Discretion

RLCP has the authority to choose what securities to buy and sell, what quantity of securities to buy and sell, what broker dealer, what futures commission merchant to use and what commission rates to negotiate.

Voting Client Securities

RESPONSIBILITY TO VOTE PROXIES

Rhoads Lucca Capital Partners L.P. (“RLCP”) has assumed the responsibility of voting proxies on behalf of all Clients.

RLCP is regulated by various state and federal laws, such as the Investment Advisers Act of 1940, the Investment Company Act of 1940. These proxy voting policies and procedures apply to all of the Clients.

A copy of the Proxy Voting Policies and Procedures will be retained in our files. We may amend our proxy policies and procedures from time to time without prior notice to its Clients.

A copy of Rhoads Lucca Capital Partners L.P. Proxy Voting Record may be obtained by making a request by email at gp@rhoadslucca.com or by calling 1.888.895.1212.

Any request from a Client for information about how we voted with respect to the securities held in the Client’s portfolio and any written response from us will be retained in our files.

Information about how RLCP voted with respect to the securities held in the

portfolios of its Clients and all documentation related to the proxy voting procedures discussed below will be retained in our files for a period of five years from the end of the fiscal year during which the last entry was made on such record.

PROXY VOTING POLICY AND PROCEDURES

Consistent with applicable fiduciary standards, RLCP will vote proxies with respect to the securities held in a Client's portfolio unless we determine that any benefit that the Client might gain from voting a proxy would be outweighed by the costs associated with voting. In voting such proxies, we will act prudently, taking into consideration those factors that may affect the value of the security, and will vote such proxies in a manner that, in its opinion, is in the best interest of the Client.

CONFLICTS OF INTEREST

There may be occasions where the voting of proxies may present an actual or perceived conflict of interest between RLCP and its Clients.

Potential conflict of interest situations include, but are not limited to, the following situations:

- where we or an affiliated person of RLCP (a "RLCP Affiliate") manages assets, administers employee benefit plans, or provides other financial services or products to a company whose management is soliciting proxies,
- where we or a RLCP Affiliate manages assets of a proponent of a proxy proposal or has another business relationship with the proponent,
- where we or a RLCP Affiliate has personal or business relationships with participants in a proxy contest or with corporate directors or candidates for corporate directorships, or
- where we or a RLCP Affiliate has a personal interest in the outcome of a

particular matter before shareholders.

In order to avoid even the appearance of impropriety, if RLCP determines that voting a proxy for a Client presents an actual or potential conflict of interest, RLCP will disclose the conflict to the Client and obtain the Client's consent before voting such proxy.

PROXY VOTING PROCEDURES

Our management team determines the manner in which a proxy will be voted based on review of the RLCP Proxy Policy. John Rhoads and David Lucca vote proxies and transmit such proxies in a timely manner pursuant to the instructions provided in the proxy materials. Proxies are mailed the same day they are signed and dated.

We maintain information about the manner in which we voted the proxies related to securities held in each Client's portfolio. We also maintain all required records related to proxy voting on behalf of the Clients, including but not limited to, copies of proxy materials and internal documentation related to the proxy voting process.

Each Client's custodian or trustee is responsible for forwarding proxy solicitation material to RLCP in a timely manner.

PROXY VOTING GUIDELINES

We consider each proposal on its own merits. Our proxy voting policy provides a broad outline of how we generally vote with respect to certain types of issues:

A. Basic Corporate Governance Issues - We generally vote for corporate proposals recommended by management of a company unless we feel the proposal will have a

negative impact on the value of the company's stock.

B. Anti-Takeover Defense and Related Actions - We generally vote AGAINST management sponsored anti-takeover proposals since they tend to reduce shareholders rights.

C. Compensation Plans - We believe that, in order for companies to recruit, promote and retain competent personnel, companies must provide appropriate and competitive compensation plans. So we generally will vote FOR management sponsored compensation plans that are reasonable, industry competitive and not unduly burdensome to the company.

D. Capital Structure and Recapitalization - We recognize that from time to time companies must reorganize their capital. We generally will vote FOR these management sponsored reorganization proposals if the proposals will help the company gain better access to the capital markets and attain a better financial position. We generally will vote AGAINST such proposals that appear to entrench management and do not provide shareholders with economic value.

PROXY VOTING GUIDELINES SPECIFIC TO MUTUAL FUNDS

RLCP serves as investment adviser to an investment company under the Northern Lights Fund Trust, the Autopilot Managed Growth Fund. This fund may invest in other investment companies that are not affiliated ("Underlying Funds") and are required by the Investment Advisers Act of 1940, as amended (the "1940 Act") Act to handle proxies received from Underlying Funds in a certain manner. It is the policy of RLCP to vote all proxies received from the Underlying Funds in the same proportion that all shares of the Underlying Funds are voted, or in accordance with instructions received from fund shareholders, pursuant to Section 12(d)(1)(F) of the 1940 Act. After properly voted, the proxy materials are placed in a file maintained by the Chief Compliance Officer for future reference.

EXCHANGE TRADED FUNDS (ETF's) PROXY VOTING GUIDELINES

Rule 12d-1A under the Investment Company Act (a.k.a. the "3, 5 & 10 Rule") restricts an investment company's ability to invest in other investment companies.

Rule 12d-1F (after recent amendments) effectively grants relief from all but one of the restrictions of 12d-1A.

Rule 12d-1A states that you can not invest more than 5% of your Fund's assets in any single underlying fund or more than 10% of your Fund's assets in underlying funds in the aggregate; and you cannot purchase more than 3% of the outstanding voting securities of an underlying fund. Note that for the purposes of this 3% restriction, the Fund must aggregate its holdings in the underlying fund with the holdings of other entities under common control with the Fund.

Rule 12d-1F states that, if you do "mirror voting," you may ignore the 5 and 10% restrictions of Rule 12d-1A, but not the 3% restriction. Mirror voting means that proxy voting policies and procedures must have a provision that states that all proxies voted with respect to underlying funds will be voted in the same proportion as all other shareholder votes in the underlying fund on each proposal. In other words, when voting a proxy of an underlying fund, we will not simply check a box; rather we will provide a form letter attached to the ballot.

RLCP has authority to vote proxies for its clients who have properly delegated that responsibility to us, and we have policies and procedures in place which clients may request to see at any time to review. A copy of how we voted can be requested by email at information@rhoadslucca.com or by calling 1.888.895.1212.

Financial Information

As mentioned under the “management fees” section (starting on page 4), RLCP provides discretionary money management services as the Adviser of the Autopilot Mutual Funds®. All fees to clients are built into the funds.

We utilize technology and continually invest in the infrastructure of our company to allow us to sustain our business. We have written procedures for Disaster Recovery and Business Continuation, where in the event of a natural disaster; power outages; fire; etc.; our investment business is handled remotely with little or no break in service.

RLCP is financially solid, with minimal debt. Most of which, are recurring monthly expenses necessary to conduct business.



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John D. Rhoads

ADV Part 2B – Annual Update

January 2012

Brochure Supplement

This brochure provides information about John D. Rhoads that supplements the Rhoads Lucca Capital Partners, LP brochure. You should receive a copy of that brochure. Please contact us at 888-895-1212 if you did not receive Rhoads Lucca Capital Partners, LP's brochure or if you have any questions about the contents of this supplement.

Additional information about Rhoads Lucca Capital Partners, LP also is available on the SEC's website at www.adviserinfo.sec.gov.

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JOHN D. RHOADS

ADV2 – Supplement (dated January 2011)



Education Background and

Business Experience

John Rhoads and David Lucca are principals in Rhoads Lucca Capital Management, Inc. which is the General Partner of RLCP and an S.E.C.-Registered Investment Adviser (IARD #801-27938)

John has devoted more than 40 years to helping his clients navigate their financial lives. His career, in many ways, mirrors the history of the financial services industry - with John usually on the front edge of each change curve.

Fresh out of the Air Force in 1964, John started his professional career in the insurance arena, but quickly realized that insurance didn't solve all his clients' needs. He soon became licensed to help his clients with the investment side of their lives. His career grew from insurance planning to investment planning to the new profession of financial planning, and finally into fee-only private asset management. Each step of the way, John has also been willing to leave behind old ways of doing things when it meant his clients could be served more effectively.

Along the way, John also served as a branch manager for a national securities firm, running the Dallas branch office called Dallas/Rhoads/Associates.

Next, John was early in joining the new profession of financial planning, earning the designation of Certified Financial Planner designation, and teaching Dallas-area CFP candidates the investment section of the CFP preparation materials. In these classes, he

taught two students who would become lifelong friends, and pivotal in shaping his own future career: Ricky Grunden and David Lucca. In 1996 Ricky and Dave officially became partners with John, and the company was re-named Rhoads Grunden Lucca Capital Management, Inc. This was later shortened to Rhoads Lucca Capital Management.

John has received numerous industry honors and awards during his 40 years in the financial services field, including the honor of being named one of Ticker Magazine's "Ace Advisers" for 1998. [He is a trusted source that adds depth and perspective to the work of the financial media.](#)

John's enthusiasm for investing and for life is contagious to everyone who spends time with him – including us! For over 20 years, John has taught adult Sunday School at Grace Bible Church, in Dallas, TX, where he is also an Elder. In his free time you will find John playing golf, supporting his "team" the Dallas Cowboys and enjoying time with his wife of 47 years, Mary, his two daughters and 6 grandchildren.

In discussing the firm's philosophy, John says, "We *start* with doing the right thing *first*. People need advisors they can trust, who'll treat them right and put their interests first. For money management and investment advice, that's Rhoads Lucca Capital."

EDUCATION BACKGROUND

John D. Rhoads (born 1941)

Education:

- Midwestern University (Wichita Falls, TX): General studies
- Dallas Bible College (Dallas, TX): General studies
- College for Financial Planning (Denver, CO): Certified Financial Planner, 1984-2007

Business:

- Rhoads Lucca Capital Management, Inc.: President, 11/80-present
- Walnut Street Securities: Registered Representative and Branch Manager (Dallas, TX), 8/90-4/99
- Advantage Capital: Registered Representative and Branch Manager (Dallas, TX), 1/75-8/90

DISCIPLINARY INFORMATION

No disciplinary actions have been filed or taken against John D. Rhoads.

OTHER BUSINESS ACTIVITIES

RLCP is a Limited Partnership whose General Partner (1% interest) is Rhoads Lucca Capital Management, Inc. Principal owners are the same for both entities. No clients have an ownership interest in either.

ADDITIONAL COMPENSATION

John receives no additional compensation other than his normal compensation with RLCM.

SUPERVISION

John does not have supervisory responsibilities.



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David A. Lucca

ADV Part 2B – Annual Update

January 2012

Brochure Supplement

This brochure provides information about David A. Lucca that supplements the Rhoads Lucca Capital Partners, LP brochure. You should receive a copy of that brochure. Please contact us at 888-895-1212 if you did not receive Rhoads Lucca Capital Partners, LP's brochure or if you have any questions about the contents of this supplement.

Additional information about Rhoads Lucca Capital Partners, LP also is available on the SEC's website at www.adviserinfo.sec.gov.

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David A. Lucca

ADV2 – Supplement (dated January 2011)

Education Background and Business Experience



John Rhoads and David Lucca are principals in Rhoads Lucca Capital Management, Inc. which is the General Partner of RLCP and an S.E.C.-Registered Investment Adviser (IARD #801-27938)

Dave began his investment career in 1986 as a financial planner, earning the designation of Certified Financial Planner three years later. After practicing as a CFP for 12 years, Dave was among the first investment advisers in the nation to give back this same designation.

He did this after seeing that the investment philosophy behind the credential no longer fit the dramatic changes that were coming to the markets. His argument that the firm couldn't serve clients well with an outdated investment philosophy, was confirmed when the 2000-2008 bear market struck investors.

By taking the investment road less-traveled several years in advance, Dave and John created the innovative investment strategies that allowed Rhoads Lucca clients to survive the bear market of 2000 and avoid the devastating losses that clients of other investment firms experienced.

He was chosen by his professional peers as President of the National Association of Active Investment Managers (NAAIM) in 2000. Ticker Magazine chose Dave as one of "Five Ace Advisors" in America in 2000, winning "Greatest Contribution to the Industry". [Dave is interviewed and quoted frequently as an investment authority in the](#)

[media](#), including the Wall Street Journal, Business Week, the Washington Post, and many others.

Dave is a graduate of The Pennsylvania State University and also earned a Master's degree from Dallas Theological Seminary. For years, Dave taught as an adjunct faculty member for the College for Financial Planning in Dallas-area colleges. He has been included in Who's Who in America: Finance & Industry since the 1990s.

Anyone who knows Dave, knows he is a Penn State Football fan ("long-suffering Penn State Football fan" is the way he describes it). He also has a passion for unique experiences, that leads him into some unusual adventures, like flying to Russia with his wife Jan to adopt a daughter, climbing Mt. Fuji in Japan with his son John, sailing with his daughter in the Virgin Islands, or recently meeting with two-time, World Heavyweight Champion, George Foreman.

Dave and his wife Jan live far from Wall Street, in the middle of Pennsylvania Amish country. They have three adult children and their dog, Bear. Dave is a prolific reader, and seemingly interested in everything. He often making connections between ideas that are later integrated into the firm's investment strategy. He is passionate about creating growth and income that's safe and predictable for our clients.

EDUCATION BACKGROUND

David A. Lucca (born 1957)

Education:

- Pennsylvania State University (State College, PA): BS, Recreation & Parks Leadership, 1980
- International Graduate Christian University (San Bernardino, CA): Certificate, Biblical Study, 1983

- Dallas Theological Seminary (Dallas, TX): MA, Biblical Studies, 1986
- College for Financial Planning (Denver, CO): Certified Financial Planner, 1989-2007

Business:

- Rhoads Lucca Capital Management, Inc.: Vice President, 12/88-present
- Gary Smith, CPA, PC: Investment Management, 12/86-12/88

DISCIPLINARY INFORMATION

No disciplinary actions have been filed or taken against David A. Lucca.

OTHER BUSINESS ACTIVITIES

RLCP is a Limited Partnership whose General Partner (1% interest) is Rhoads Lucca Capital Management, Inc. Principal owners are the same for both entities. No clients have an ownership interest in either.

David Lucca independently runs www.uspfa.org which provides financial information on a subscription basis to commercial pilots.

ADDITIONAL COMPENSATION

Dave receives no additional compensation other than his normal compensation with RLCP.

SUPERVISION

Dave does not have supervisory responsibilities.