

PERSPECTIVE WEALTH PARTNERS, LLC

913 North 10th Street
Boise, ID 83702

(208) 429-0960

www.perspectivewealth.com
jamesb@perspectivewealth.com

March 5, 2012

This Brochure provides information about the qualifications and business practices of Perspective Wealth Partners, LLC. If you have any questions about the contents of this Brochure, you may contact us at (208) 429-0960, or email jamesb@perspectivewealth.com to obtain answers and additional information. Perspective Wealth Partners, LLC is a registered investment advisor with the State of Idaho and are also registered with the State of Washington, Oregon and California. Registration of an investment adviser does not imply any level of skill or training. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission, the State of Idaho or any other state securities regulating authority.

Additional information about Perspective Wealth Partners, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

The date of our previous annual update to our Brochure was February 28, 2012.

We will ensure that all current clients receive a Summary of Material Changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. A Summary of Material Changes is generally available, with our Brochure, on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Perspective Wealth Partners, LLC is 140330. The Summary of Material Changes is listed as "Exhibit A" to our Brochure. We may further provide other ongoing disclosure information about material changes as necessary and will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting James Bailey at (208) 429-0960, or by email to jamesb@perspectivewealth.com.

Perspective Wealth Partners, LLC
Form ADV Part 2A – Firm Brochure

Item 3 – Table of Contents

Page

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

Exhibit A	Summary of Material Changes.....	Exhibit A -1
-----------	----------------------------------	--------------

ADV Part 2B	Supplement Brochure for James Bailey.....	ADV 2B - 1
-------------	---	------------

Item 4 – Advisory Business

- A** Perspective Wealth Partners, LLC (“Perspective Wealth Partners” “we” “us” and “Advisors”) is an independent financial planning and investment management firm. We are an Idaho Limited Liability Company registered as an investment advisor under the laws of the State of California, Idaho, Oregon and Washington with our principal place of business located in Boise, Idaho. Perspective Wealth Partners began conducting business as an independent investment advisory firm in 2006. James Bailey is the founder and President of Perspective Wealth Partners, and has a 100% ownership interest in the firm.
- B** Perspective Wealth Partners offers a wide range of investment advisory services to our Clients, which include:
- Analysis of existing assets and investments
 - Investment selection, portfolio design, and portfolio implementation
 - Understanding and assessment of Client goals (education, savings, etc.) and financial flexibility (possible retirement ages, achievement of goals, etc)
 - Generation of a Client balance sheet
 - Assessment of risk management (insurance needs)
 - Creation of a detailed financial plan furnishing recommendations as to the allocation of present financial resources and investment strategies necessary to attain plan objectives
 - Financial Independence/Retirement Planning
 - Employee Stock Option Planning

We offer Clients a comprehensive approach to wealth management. We generate financial plans that match their goals and tailor investment portfolios to our Clients’ plans. In addition, we provide advice and referrals in other financial areas including estate-planning, tax-planning and preparation, and insurance.

INVESTMENT ADVICE:

Our investment advising service usually begins with an analysis of a Client’s current (pre-Perspective Wealth) investment portfolio to identify strengths, weaknesses, and recommended areas of improvement – especially in the areas of risk, return, asset allocation,

and cost structure. Next, a tailored portfolio matching Client risk tolerance, return expectations, and time horizon is developed and documented in the form of a written Investment Policy Statement (IPS). After agreement on the IPS, the portfolio is then implemented.

Following implementation, the investment portfolio is monitored and rebalanced as necessary. At the same time, we continuously evaluate new investments and investing strategies for suitability and use within the investment portfolio.

An investment performance review is delivered quarterly to each Client. The review covers performance against financial plan goals, and performance of individual investments against their target benchmarks.

FINANCIAL PLANNING:

Perspective Wealth Partners, LLC also provides an optional financial planning service for our Clients wishing to use our advisory services. At the onset of a professional relationship, we work with each Client to better understand their objectives and concerns. Based on this information, we will prepare a written financial plan for all financial planning Clients. The plan includes gathering all information necessary to provide each Client with appropriate and agreed upon services, which may include one or more of the following: Budgeting and cash flow planning, disability planning and income protection, business succession planning, retirement planning and investment planning. The plan considers all Client assets, liabilities, goals and objectives.

ADVANCED FINANCIAL PLANNING:

Clients have a lot more at stake than just their investment portfolio. Advanced financial planning covers the numerous and broad areas Clients will undoubtedly face at one time or another. These areas most often encompass:

- Core financial planning (retirement and education funding goals)
- Wealth preservation (tax minimizing strategies)
- Wealth protection (asset protection and life insurance needs)
- Wealth transfer (estate structure and charitable or family gifting desires)

C Our advice and services are tailored to the stated objectives of each Client. Perspective Wealth Partners develops a written Investment Policy Statement (IPS) for each Client. The

IPS is informed by the Client's financial plan and emotional tolerance for risk. It serves as the foundational roadmap for the investment portfolio. Developing and consistently adhering to an investment policy allows our Clients to focus on the long term goals of their financial plan, rather than become caught up in the short term movements of the equity markets. All transactions in a Client's account are made in accordance with the directions and preferences provided to us by the Client.

In order to best serve their needs, we encourage our Clients to notify us of any life events or financial changes that could affect their individual financial circumstances and needs.

- D** We do not participate in or sponsor any wrap-fee programs.
- E** Perspective Wealth Partners manages \$60,541,923.00 of Client assets on a non-discretionary basis and no Client assets on a discretionary basis. This amount was calculated as of December 31, 2011.

Item 5 – Fees and Compensation

- A** We are compensated for our services in accordance with “Schedule A” of the Investment Advisory Agreement (“IAA”), that each Client enters into at the beginning of our professional relationship. The IAA may be amended from time to time upon 30 days written notice to a Client. Such fees may be paid directly to Perspective Wealth Partners from the account by the independent custodian holding a Client’s account, upon submission of an invoice to the custodian showing the amount of fees, the value of the Client’s assets on which the fees are based, and the specific manner in which the fees are calculated. Payment of fees may result in the liquidation of a Client’s securities if there is insufficient cash in the account. Clients may be required to pay, in addition to our fee, a proportionate share of any mutual fund’s fees and charges.

Fees for each quarter are paid at the end of the quarter based on the total value of assets under management at the close of trading on the last business day of the quarter. The fee will be equal to the agreed upon rate per annum (set-forth in the IAA entered into each Client), times the market value of the account, divided by the number of days in the agreed upon year and multiplied by the number of days in the quarter. The market value will be construed to equal the sum of the values of all assets in the account, not adjusted by any margin debit. Fees for partial quarters at the commencement or termination will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the quarter.

STANDARD FEE SCHEDULE

1.00% on assets up to \$750,000
0.75% on assets between \$750,001 and \$1,500,000
0.50% on assets over \$1,500,001

For defined contribution or retirement plan assets which are not held by our recommended independent custodian, a flat fee of .50% will be assessed to that portion of a Client’s portfolio.

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported shall be valued at the last reported sale price on the principal market in which they are traded (or, if there shall be no sales on such date, then at the mean between the closing bid and asked prices on such date). Other readily marketable securities shall be priced using a pricing service or through quotations from one

or more dealers. All other assets shall be valued at fair value by the Advisor whose determination shall be conclusive.

The fee for financial planning services typically ranges from \$750.00 to \$1,500.00, due at time of service.

- B** As noted in the above section, our fees are deducted from Client's assets held with an independent custodian, and paid directly to Perspective Wealth Partners based on the agreement entered into at the start of the advisory relationship. The fee is deducted at the end of each quarter.
- C** Each Client's account custodian may charge fees, which are in addition to and separate from the investment advisory service fee we charge. All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. Clients bear responsibility for verifying the accuracy of fee calculations.
- D** Our policy is to avoid acceptance of fees in advance. Accordingly, fees for asset management service are billed at the end of each quarter. Fees for partial quarters at the commencement or termination of this Agreement will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the quarter. Quarterly fee adjustments for additional assets received into the account during a quarter or for partial withdrawals will also be provided on the above pro rata basis.
- E** Perspective Wealth Partners is a fee-only advisor which means we do not receive any compensation from the sale of securities or other investment products.

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

We do not charge any performance-based fees for our services. Accordingly, this item is not applicable to our firm.

Item 7 – Types of Clients

Perspective Wealth Partners provides investment advice and portfolio management to individuals, some percentage of who are high net worth individuals, as well as trusts, estates and charitable organizations.

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

A Perspective Wealth Partners offers advice on investments primarily including (but not limited to) the following:

- Equity securities such as:
 - Exchange-listed securities
 - Securities traded over-the-counter
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Investment company securities such as mutual fund shares
- United States government securities
- Options contracts on securities
- Interests in partnerships investing in real estate

We offer a wide range of investment advisory services to our Clients. We primarily use fundamental analysis for research and review of securities. The main sources of information we rely on to provide advice include financial publications, research materials prepared by others, annual reports, prospectuses, filings with the Security and Exchange Commission, and company press releases. We also subscribe to various professional publications deemed to be consistent and supportive of our investment philosophy.

The primary investment strategies used to implement investment advice given to Clients include long-term purchases (securities held at least one year), short-term purchases (securities sold within a year), and some margin transactions.

Our investing philosophy is based on a broad fact base. Studies have demonstrated that over the long run:

- Portfolio Structure (asset allocation and diversification) is the primary determinant of a portfolio's return and variability
- Structured investing (indexing) outperforms active investing (speculative stock picking and market timing)
- Risk and return are related; investors are best served by spending units of risk in areas where they are compensated in the form of greater return.

We create a tailored investing plan that offers the highest probability of meeting a targeted return, with the lowest level of risk. We accomplish this by methodically focusing on asset allocation, utilizing structured investment vehicles, and within a portfolio, emphasizing asset classes like small-cap, value, and emerging markets. At the same time, we eliminate the unnecessary risk and higher cost of stock picking and market timing.

- B** We will use our best judgment and good faith efforts in rendering services to Client. However, we cannot warrant or guarantee any particular level of account performance, or that account will be profitable over time. Not every investment decision or recommendation made by Advisor will be profitable. Clients assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, economic, political and business risks. Because Clients assume all market risk involved in the investment of account assets, they must understand that investing in securities involves risk of loss that each Client should be prepared to bear.

Except as may otherwise be provided by The Advisers Act of 1940 or other applicable state or federal law, Perspective Wealth Partners is not liable to Clients for:

- Any loss that a Client may suffer by reason of any investment recommendation made with that degree of care, skill, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use;
- Any loss arising from our adherence to a Client's instructions; or
- Any act or failure to act by a custodian of a Client account(s).

Nothing in this Agreement shall relieve Perspective Wealth Partners from any responsibility or liability that may arise under state or federal statutes. It is the responsibility of each Client to provide us complete information and to notify us of any changes in financial circumstances or goals.

- C** We do not limit our recommendations to a particular security therefore this Item is not applicable to our firm.

Item 9 – Disciplinary Information

We are required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our firm, or the integrity of our management. We have no information to disclose applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

The principal business of Perspective Wealth Partners is that of a registered investment advisor. We do not participate in any other financial industry activities or affiliations.

**Item 11 – Code of Ethics, Participation or Interest in Client Transactions
& Personal Trading**

- A** Perspective Wealth Partners has adopted a Code of Ethics which outlines proper conduct related to all services provided to Clients. The Code covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. Current or prospective Clients may request a copy of the firm's Code of Ethics by contacting James Bailey at (208) 429-0960 or jamesb@perspectivewealth.com.
- B, C** Perspective Wealth Partners or individuals associated with our firm may buy and sell some of the same securities for their own account that we buy and sell for our Clients. In all instances, where appropriate Perspective Wealth Partners or individuals associated with our firm will purchase a security for all of our existing accounts for which the investment is appropriate before purchasing any of the securities for our own account and, likewise, when we determine that securities should be sold, where appropriate will cause these securities to be sold from all of its advisory accounts prior to permitting the selling of the securities from its accounts. In some cases we may buy or sell securities for its own account for reasons not related to the strategies adopted by our Clients.

When Perspective Wealth Partners is newly engaged by an investment advisory Client for whom we expect to recommend securities in which our firm or our principal holds a position, we will notify the new Client of any policies we have in place regarding officers trading for their own account.

We will disclose to Clients any material conflict of interest relating to our firm, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

- D** Occasionally, we may recommend, buy and/or sell securities for our personal accounts that we may also recommend for our Client portfolios. However, there is no conflict of interest or commingling of funds, as the securities are widely held and publicly traded, and we are too small an advisor/investor to affect the market. In all cases, we place the Client's interest ahead of our own.

Item 12 – Brokerage Practices

A Although Clients may direct us to use a broker-dealer of their choosing, we generally recommend that Clients open brokerage accounts with TD Ameritrade. In recommending broker-dealers, we seek to obtain “best execution,” meaning that we seek to execute securities transactions for Clients so that the total costs or proceeds in each transaction are the most favorable under the circumstances. The factors we consider when evaluating for best execution include:

- Execution capability;
- Commission rate;
- Financial responsibility;
- Responsiveness;
- Custodian capabilities;
- The value of any research services/brokerage services provided; and
- Any other factors that we consider relevant.

However, if the Client selects the broker-dealer of their own choosing, we may be unable to seek best execution of your transactions, and your commission costs may be different than those of our recommended broker-dealers. In addition, we may place your transactions after we place transactions for Clients using our recommended broker-dealers.

Recommending a broker-dealer can create a conflict of interest. Accordingly, Perspective Wealth Partners has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer, associated person, or employee of Advisor shall not buy or sell securities for his personal portfolio where his decision is substantially derived, in whole or in part, by reason of his employment unless the information is also available to the investing public or reasonable inquiry. No person of Advisor shall prefer his or her own interest to that of the advisory Client.
2. Advisor maintains a list of all securities holdings for itself and anyone associated with its advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer of Advisor.

3. Advisor emphasizes the unrestricted right of the Client to decline to implement any advice rendered.
4. Advisor emphasizes the unrestricted right of the Client to select and choose any broker or dealer, and/or insurance company he/she wishes.
5. Advisor requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
6. Any individual not in observance of the above may be subject to termination.

As referenced above, and after thoroughly researching custodians, Perspective Wealth selected TD Ameritrade to be the custodian of our Client's assets. TD Ameritrade is a member of the Securities Investor Protection Corporation (SIPC). Through a combination of protection provided by SIPC and Lloyds of London, Client assets are protected up to \$1 million in cash and \$250 million in securities. Coverage provides protection against TD Ameritrade insolvency, not loss in value of securities. With TD Ameritrade as a custodian, Clients have direct and secure internet access to their accounts.

- B** We are authorized in our discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and other transactions in the same or similar securities or instruments for other Clients. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the account will be deemed to have purchased or sold its proportionate share of the securities or instruments involved at the average price so obtained.

Please note that stock exchange regulations may in certain instances prevent the executing broker-dealer from delivering to the account a confirmation slip with respect to its participation in the aggregated transaction and, in such event, we will advise the Client in writing of any purchase or disposition of instruments for the account with respect to any such aggregated transaction. We direct that confirmations of any transactions effected for a Client's to be sent, in conformity with applicable law, to the Client.

Item 13 – Review of Accounts

- A** Accounts are reviewed by James Bailey or a qualified staff member supervised by James Bailey. General account reviews occur on a quarterly basis, or more frequently as may be necessary. Additionally, it is the practice of Perspective Wealth Partners to review a Client's entire portfolio semi-annually, with an in-person meeting if desired. In addition, we periodically revisit each Client's goals and objectives to ensure that we are on track. This level of attention to each Client's account enables us to respond quickly if there is a change to a Client's financial position.

Financial planning Clients receive their financial plans and recommendations at the time service is completed. Depending on the type of financial planning service requested, we will meet on a regular basis with Clients to discuss any potential changes to their financial plan.

- B** Special reviews are conducted when material changes occur, such as a change in a Client's investment objectives, tax considerations, large deposits or withdrawals, large sales or purchases, loss of confidence in corporate management, or changes in the macro-economic climate.
- C** All investment advisory Clients receive quarterly reports on representative investments recommended specifically by Perspective Wealth Partners. Investment advisory Clients also receive standard account statements from the custodian of their accounts on a monthly or quarterly basis. Financial planning Clients do not normally receive investment reports.

Item 14 – Client Referrals and Other Compensation

Perspective Wealth Partners has no arrangements, written or oral, in which it compensates any individuals or entities for referrals of Clients, nor are there arrangements by which other economic benefits (such as sales awards or incentives) are derived.

Item 15 – Custody

Other than having the ability to deduct our fees from Client accounts, Perspective Wealth Partners does not have custody of the assets in the account and shall have no liability to Clients for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation (“SIPC”) or any other insurance which may be carried by the custodian. Clients understand that SIPC provides only limited protection for the loss of property held by a broker-dealer.

Item 16 – Investment Discretion

Perspective Wealth Partners has non-discretionary authority to execute its investment recommendations in accordance with each Client's objectives and suitability parameters. Non-discretionary authority requires us to obtain a Client's approval of each specific transaction prior to executing investment recommendations. We must also obtain prior Client approval when selecting and retaining sub-advisors to the account.

Item 17 – Voting Client Securities

Unless specifically directed otherwise in writing by the Client, Perspective Wealth Partners is not authorized to receive and vote proxies on issues held in the account or receive annual reports.

Item 18 – Financial Information

- A** Perspective Wealth Partners does not require prepayment of fees of more than \$500 per Client six months or more in advance, therefore disclosures required in this section to not apply to our firm.
- B** Perspective Wealth Partners has no financial commitment which would impair or impede its ability to meet contractual and fiduciary commitments to Clients.
- C** Perspective Wealth Partners, nor anyone associated with our firm, has ever been the subject of a bankruptcy petition.

Item 19 – Requirements for State-Registered Advisers

- A** The owner of Perspective Wealth Partners is James Bailey, President. James Bailey performs investment advisory services on behalf of PWP for Clients. Mr. Bailey is also responsible for the day to day management and operations of the firm. Mr. Bailey's education and background are separately detailed in Part 2B, Item 2 (below).
- B** Mr. Bailey is not involved in any other business operations.
- C** Perspective Wealth Partners does not receive performance-based fees.
- D** Neither Mr. Bailey, nor anybody associated with Perspective Wealth Partners, has ever been the subject of any claims or liability in a civil, self-regulatory or administrative proceeding involving any investment or investment-related business activity or, any dishonest, unfair or unethical practices.
- E** Perspective Wealth Partners does not have a relationship or arrangements with any issuer of securities, therefore we have no information to disclose applicable to this Item.

Exhibit A – Summary of Material Changes

This Item discusses only specific material changes that have been made to our Brochure since the date of our last annual update, which was February 28, 2012. Since that date we have made the following material changes:

Item 4: This Item has been revised to disclose that Perspective Wealth Partners is transitioning from registration with the Securities and Exchange Commission to state registration. We are seeking approval of our registration in the states of Idaho, Washington, Oregon and California.

Item 19: This Item has been revised for disclosures specifically required for state (versus SEC) registered investment advisers.

Part 2B: Brochure supplements for James Bailey have been revised for disclosures specifically required for state (versus SEC) registered investment advisers.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary and will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting James Bailey at (208) 429-0960, or by email to jamesb@perspectivewealth.com. Our Brochure is provided free of charge.

JAMES M. BAILEY

PERSPECTIVE WEALTH PARTNERS, LLC

913 North 10th Street
Boise, ID 83702

(208) 429-0960

www.perspectivewealth.com
jamesb@perspectivewealth.com

March 5, 2012

This Brochure Supplement provides information about James M. Bailey that supplements the Perspective Wealth Partners, LLC Brochure (Form ADV Part 2A). You should have received a copy of that Brochure. Please contact James Bailey at (208) 429-0960 or jamesb@perspectivewealth.com if you did not receive copy of Perspective Wealth Partners, LLC Form ADV Part 2A or if you have any questions about the contents of this Brochure Supplement.

Additional information about James M. Bailey is available on the SEC's website at www.adviserinfo.sec.gov.

JAMES M. BAILEY

Year of Birth: 1966

Item 2 – Educational Background and Business Experience

Education

Masters of Business Administration, 1995
Willamette University (Salem, OR)

Bachelors of Science in Economics, 1988
Willamette University (Salem, OR)

Business Background

4/2006 to Present President, Investment Advisor Representative
Perspective Wealth Partners, LLC (Boise, ID)

1/2003 to 4/2006 Director Business Development
Capital One Financial (Boise, ID)

1/1996 to 12/2002 Director, Consumer Marketing
Hewlett Packard (Vancouver, WA)

1/1988 to 12/1995 Director, Consumer Marketing
II Morrow, Inc. (Salem, OR)

Industry Examinations and Professional Designations:

James Bailey has previously taken and passed the following industry examinations: Series 65.

Item 3 – Disciplinary Information

James Bailey has not been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client's evaluation of his or any of the services Perspective Wealth Partners, LLC provides.

Item 4 – Other Business Activities

James Bailey is not involved in any investment related business activities outside of his employment with Perspective Wealth Partners, LLC.

Item 5 – Additional Compensation

James Bailey does not receive additional compensation or economic benefit from any third parties for providing advisory services to Clients of Perspective Wealth Partners, LLC.

Item 6 – Supervision

James Bailey, Chief Compliance Officer, is responsible for supervising the services and advice provided to Clients of Perspective Wealth Partners, LLC. He prepares investment policies, forms and procedures for those Clients to whom he is the primary advisor representative and firm contact.

Item 7 – Requirements for State-Registered Advisers

James Bailey has never been subject to any arbitration claim or any other proceedings (civil, self-regulatory organization or administrative) related to investments, fraud, theft, bribery or dishonest, unfair or unethical practices. He has never been the subject of any bankruptcy petition.