

## Item 1 Cover Page



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April 16, 2012

### **TFA Wrap Fee Program Brochure**

This TFA Wrap Fee Program brochure provides information about the qualifications and business practices of Fund Architects, LLC. If you have any questions about the contents of this brochure, please contact us at (866) 539-4186. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Fund Architects, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Clients can search this site by using Advisor's name or by an identification number known as a CRD number. The CRD number for Advisor is 145395.

## Item 2      Material Changes

On January 6, 2012, Burt Snover (President) was named co-Chief Investment Officer to assist Todd Porter in the investment responsibilities of the firm. Todd Porter, co-Chief Investment Officer, resigned from the firm and divested all ownership on April 16, 2012. The remaining ownership of the firm is split equally between Burt Snover and Keith Reed.

Additional investment professionals were added to the investment committee on April 16, 2012. Mr. J.C. Waller III assumed the duties of co-Chief Investment Officer. Mr. Xianghai 'Henry' Ma, Ph.D., CFA®, has joined the firm as Chief Market Strategist and member of the Investment Committee. Jun Zhu, Ph.D., CFA®, was retained as an Investment Committee member and Portfolio Manager on future offerings.

No other material changes have been identified at this time.

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## **Item 4     Services, Fees and Compensation**

### ***Services***

For certain clients, Fund Architects, LLC (the “Advisor”) may manage client portfolios by allocating portfolio assets among various mutual funds and exchange traded funds (together “funds”) on a discretionary basis using one or more of its proprietary investment strategies (collectively referred to as “investment strategy”). In so doing, the Advisor shall buy, sell, exchange and/or transfer shares of funds based upon the investment strategy.

In addition clients may, in writing, place reasonable limitations upon the Advisor’s discretionary authority. The investment strategy may involve an above-average portfolio turnover that could negatively impact upon the net after-tax gain experienced by an individual client. Securities in the investment strategy are usually exchanged and/or transferred without regard to a client’s individual tax ramifications. Certain investment opportunities that become available to the Advisor’s clients may be limited. For example, various mutual funds or insurance companies may limit the ability of the Advisor to buy, sell, exchange or transfer securities consistent with its investment strategy. In order to meet its fiduciary duties to all of its clients, the Advisor will endeavor to allocate investment opportunities among its clients on a fair and equitable basis. Participation in the Advisor’s investment strategy carries additional risk to clients in that a mutual fund or insurance company may unilaterally restrict and/or prohibit the Advisor’s trading activities thus prohibiting it from managing the assets consistent with the investment strategy.

When a client is referred to the Advisor by third-party investment advisor, all applicable contracts and account paperwork will be completed by the client with the assistance of the introducing advisor. The introducing advisor will obtain the necessary financial data from the client, assist the client in determining suitability, and help the client to set the appropriate investment objectives. The introducing advisor will then provide all necessary information to Advisor. The introducing advisor will meet with the client periodically to review the client’s financial situation, investment objectives, and current portfolios and then make any necessary changes to the portfolio strategy selection, notice of which will be sent to the Advisor. The introducing advisor will be responsible for providing the Advisor’s disclosure brochure.

Advisor will have the power and authority, as granted by the client to make investment decisions over the portion of the client’s assets managed by Advisor.

## ***Fees and Compensation***

Clients may choose to pay a fee to participate in a wrap program sponsored by the Advisor (known as the “Wrap Program Fee”). The Wrap Program Fee includes any charges paid to the Advisor and an asset based custodial charge designed to cover transaction fees incurred within the account.

### Fee Schedule

<u>Account Balance</u>	<u>Wrap Program Fee</u>	<u>Introducing Advisor's Fee</u>	<u>Total Fee</u>
All Accounts	0.58%	0% - 1.67%	0.58% - 2.25%

Certain fees are not included in the Wrap Program Fee, the most significant of which is the fee charged by the introducing advisor. For more information, see ‘Other Issues Relating to Fees’ below.

The Wrap Program Fee is not negotiable.

## **Other Issues Relating to Fees**

Since transaction fees are covered by an asset based custodial charge within the Wrap Program Fee, the client may pay more or less for the Advisor's services by participating in the wrap program. The factors effecting this determination are the size of the account being managed, and the number of transaction that occur within the account.

The Wrap Program Fee does not cover certain charges associated with securities transactions in clients' accounts, including: (i) the internal charges and fees that may be imposed by any Funds, (such as operating expenses, management fees, redemption fees, 12b-1 fees and other fees and expenses. Further information regarding charges and fees assessed by Funds may be found in the appropriate prospectus or offering document) or other regulatory fees; (ii) dealer markups, markdowns or spreads charged on transactions in over-the counter securities; (iii) any brokerage commissions or other charges, including contingent deferred sales charges (“CDSC”), charged upon the liquidation of “in-kind assets” that are transferred in the account, (iv) taxes, (v) the charge to carry tax lot information on transferred mutual funds or other investment vehicles, (vi) any optional services, including wire fees or transfer charges associated with a client's withdrawals.

In addition to the redemption fees described above, a client may incur redemption fees, when the Advisor determines that it is in the client's overall interest, in conjunction with the stated goals of the investment strategy, to divest from certain Funds prior to the expiration of the minimum holding period of the Funds.

Some mutual funds also assess redemption fees to investors upon the short-term sale of its funds. Depending on the particular mutual fund, this may include sales for

rebalancing purposes. Please see the prospectus for the specific mutual fund for detailed information regarding such fees.

## **Item 5      Account Requirements and Types of *Clients***

Fund Architects, LLC is an SEC registered investment adviser providing investment management services to individuals, private pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

Fund Architects' account minimums are determined separately for each platform our models are offered. Generally a \$25,000 to \$50,000 minimum is required for new accounts, although we may waive the account minimum from time to time at our discretion.

## **Item 6      Portfolio Manager Selection and Evaluation**

Fund Architects typically invests in 10-20 mutual fund or exchange-traded funds (ETFs) for our clients. Each of these funds or ETFs invests in anywhere from 30-1000 individual stocks, bonds, futures or options.

Each of our clients is assigned to an investment strategies that range from Growth, which has almost all of its money invested in equities, to Defensive, which has around 20% of the money invested in equities, with the rest in bonds and other investments.

Clients will also have access to Fund Architects' ViewPoint Portfolios, which do not invest client assets according to a stated risk tolerance. Instead, ViewPoint Portfolios are managed to an investment theme (such as Global Austerity or Asia Rising). It is the client's responsibility to instruct Fund Architects to change their investment model when the client's viewpoint changes.

Fund Architects investment decisions rely on information from the economy, financial markets, and fund manager performance and analysis. The economic analysis helps drive asset allocation (for example, stocks, bonds, or cash), sector selection (for example, technology stocks or energy stocks), and manager selection (aggressive vs. defensive managers). Our economic analysis focuses on economic data from government statistical agencies, private data sources, and the business press. This data may include: GDP, jobs data, leading economic indicators, housing prices, consumption, industrial production, retail sales, inflation, Federal reserve statements and policies. Financial market data helps us decide which investments are undervalued in the markets and so affects our asset allocation, sector selection and manager selection decisions. This data may include stock market prices, valuation ratios (such as the price-to-earnings ratio), and interest rates. Fund manager performance and portfolio data helps Fund Architects make fund selection decisions and may include: specific time-period performance (a fund's return in 2008), trailing-time period performance (a fund's return over the past three years), risk measures (how much the

fund goes up and down relative to other funds or indexes), risk-adjusted performance measures (a measure that combines return measures and risk measures), correlation measures (how much a fund goes down as other funds go down), portfolio characteristics (for example, large companies vs. small companies, or banks vs. utilities), manager history and tenure, expenses, portfolio structure and turnover.

Fund Architects portfolios are not rebalanced based on time, but rather based on market conditions and client-specific considerations.

Fund Architects does not have a third party review its performance information. There is therefore no guarantee that performance is calculated in accordance with any industry or other standards. The Advisor uses an asset weighted average of all accounts included in a model over the stated period. The performance results are reported net of all Advisor fees, Fund expenses, soliciting advisor fees, transaction charges and other custodial charges, including any asset based wrap fees, redemption fees, and short-term trading fees. The performance results are meant to show the net client experience.

## **Item 7      *Client Information Provided to Portfolio Managers***

Fund Architects does not distribute client information to any third-party vendors.

## **Item 8      *Client Contact with Portfolio Managers***

You may be limited in your ability to speak directly with Fund Architects regarding your account and participation in the wrap program. However, your introducing advisor or agent is available to address any questions, issues or concerns you may have about Fund Architects and its recommendations.

## **Item 9      *Additional Information***

### ***Disciplinary Information***

Neither the Advisor, nor its management persons, has been involved in disciplinary or legal events regarding its advisory business or the integrity of management of client's accounts.

### ***Other Financial Industry Activities and Affiliations***

While Advisor's only business activity involves providing investment advice to clients, some Investment adviser representatives are involved in other activities. Burt Snover

and Keith Reed are also independently licensed as independent insurance agents for various insurance companies and agencies. Burt Snover is also the owner and President of Timmons/CompEdge Agency Corp. (dba CompEdge Financial) which is an insurance brokerage.

Keith Reed owns and operates a duly licensed insurance agency The Money Group, LLC. Burt Snover conducts fixed insurance business in a sole proprietor capacity using the name Foresight Financial Group. Clients should be aware that Mr. Snover and Mr. Reed will generally only recommend insurance products of those companies for whom they are sales agents and with which they are familiar with the benefits, exclusions and other terms. A conflict of interest exists to the extent that the Advisor recommends the purchase of insurance products where the Advisor's Investment adviser representatives receive insurance commissions or other additional compensation.

Burt Snover and Keith Reed are registered representatives of Transamerica Financial Advisors, Inc. Burt Snover is also an investment advisor representatives of Transamerica Financial Advisors, Inc.

Clients should also be aware that Advisor's principal officers are landlords and owners of their own rental property. This business does not involve Advisor's clients in anyway. Approximately, 5% of their time is dedicated to this business.

Advisor's principal officers are also general partners of family limited partnerships that have been established solely for personal purposes. These activities comprise a very small portion of their time and to do not involve clients in anyway.

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

The Advisor and persons associated with the Advisor ("Associated Persons") are not permitted to buy or sell securities that it also recommends to clients consistent with the Advisor's policies and procedures.

The Advisor has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("Code of Ethics"). In accordance with Section 204A of the Advisers Act, its Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by the Advisor or any of its associated persons. The Code of Ethics also requires that certain of the Advisor's personnel (called "Access Persons") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

Clients may contact the Advisor to request a copy of its *Code of Ethics*.

Unless specifically permitted in the Advisor's *Code of Ethics*, none of the Advisor's *Access Persons* may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the *Access Person*) any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of the Advisor's clients.

When the Advisor is purchasing or considering for purchase any security on behalf of a client, no *Access Person* may effect a transaction in that security prior to the completion of the purchase or until a decision has been made not to purchase such security. Similarly, when the Advisor is selling or considering the sale of any security on behalf of a client, no *Access Person* may effect a transaction in that security prior to the completion of the sale or until a decision has been made not to sell such security. These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

### ***Review of Accounts***

For those clients to whom the Advisor provides investment management services, the Advisor monitors those portfolios as part of an ongoing process while regular account reviews are conducted on at least a monthly basis. Such reviews are conducted primarily by Burt Snover. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with the Advisor and to keep the Advisor informed of any changes thereto. The Advisor or a representative on behalf of the Advisor or the client's investment advisor shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. Those clients to whom the Advisor provides investment advisory services will also receive a report from the Advisor that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance as clients may request from time to time.

### ***Client Referrals and Other Compensation***

The Advisor may receive from one of our qualified custodians, Pershing, without cost to the Advisor, computer software and related systems support, which allow the Advisor to better monitor client accounts maintained at Pershing. The Advisor may receive the



software and related support without cost because the Advisor renders investment management services to clients that maintain assets at Pershing. The software and related systems support may benefit the Advisor, but not its clients directly. In fulfilling its duties to its clients, the Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the Advisor's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence the Advisor's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Advisor may also receive monthly or quarterly retention compensation for providing educational opportunities, on-site training, travel expenses, conference calls and advertising costs.

Additionally, the Advisor may receive the following benefits from Transamerica Financial Advisors, Inc./Pershing through the TFA RIA Services: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Registered Investment Advisor Group participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

If a client is introduced to the Advisor by either an unaffiliated or an affiliated solicitor, the Advisor may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act and any corresponding state securities law requirements. Any such referral fee may be paid from the Advisor's investment management fee or be charged as an additional fee to the client, which relationship shall be disclosed. If the client is introduced to the Advisor by an unaffiliated solicitor, the solicitor shall provide the client with a copy of the Advisor's written disclosure statement which meets the requirements of Rule 204-3 of the Advisers Act and a copy of the solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement including compensation. Any affiliated solicitor of the Advisor shall disclose the nature of his/her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of the Advisor's written disclosure statement at the time of the solicitation. In addition, as discussed above, the Advisor may charge a one-time fee on all new assets to compensate wholesalers to the firm.

### ***Financial Information***

The Advisor does not require or solicit prepayment of more than \$1,200 in fees, six or more months in advance, and therefore is not required to provide financial information

## **Item 10 Requirements for State-Registered Advisers**

Fund Architects, LLC is an SEC registered investment advisor.

**Part 2B of Form ADV: *Brochure Supplement***

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**Burt Snover, CLU, ChFC**

President, Chief Compliance Officer

6710 Horizon Road #100  
Heath, TX 75032  
866-539-4186

04/16/2012

**This brochure supplement provides information about Burt Snover, President, which supplements the Fund Architects' brochure. You should have received a copy of that brochure. Please contact the IAR Support Team at 866-539-4186 if you did not receive Fund Architects' brochure or if you have any questions about the contents of this supplement.**

**Additional information about Burt Snover is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 Educational Background and Business Experience

### **BURT SNOVER, President/Chief Compliance Officer**

Born 1959

Post-Secondary Education:

University of Michigan – 1981, Bachelor of Business Administration (BBA)  
The American College – 1990, Chartered Life Underwriter(CLU)  
The American College - 1991, Chartered Financial Consultant(ChFC)

Recent Business Background:

Fund Architects, LLC, Managing Member, 10/2007-Present  
Transamerica Financial Advisors, Inc. (formerly Intersecurities Inc.(ISI)),  
Principal/Registered Representative, 07/2001-Present  
CompEdge Financial, President, 2005 to Present

The Chartered Financial Consultant® (ChFC®) credential was introduced in 1982. To earn the charter, candidates must complete a total of eight courses on topics such as investment planning, insurance planning, estate planning, tax planning, retirement planning, education planning, ethics and the financial planning process.

The Chartered Life Underwriter®, CLU®, was created in 1927 by the American College. The current course curriculum for the CLU® includes five required courses plus three elective courses. The required courses include the following:

- Fundamentals of insurance planning
- Life insurance law
- Individual life insurance
- Estate planning
- Planning for business owners

The three elective courses can be chosen from such subjects as the following:

- Financial planning
- Health insurance
- Income taxation
- Group benefits
- Retirement planning
- Investment planning

## Item 3 Disciplinary Information

The supervised person has no disciplinary or legal actions against him.

#### Item 4 Other Business Activities

Burt Snover is a registered representative of Transamerica Financial Advisors, Inc., and is independently licensed as an insurance agent for various insurance companies and agencies.

Mr. Snover is President and owner of Timmons/CompEdge Agency Corp. (DBA CompEdge Financial), a national insurance brokerage. We are not aware of any potential conflicts of interest that may arise from this activity. The agency deals with licensed agents only, not directly with the public. Mr. Snover allocates approximately forty-percent of his time to this activity.

Clients should be aware that Mr. Snover will generally only recommend insurance products of those companies for whom he is a sales agent and with which he is familiar with the benefits, exclusions and other terms.

Clients should also be aware that Mr. Snover is owner of some of the Advisor's rental property, and is a general partner of family limited partnerships that have been established solely for personal purposes. These activities comprise a very small portion of his time, and do not involve clients in any way.

#### Item 5 Additional Compensation

The supervised person receives additional compensation from commissions and overrides of his duties as a registered representative of Transamerica Financial Advisors, Inc., and his various insurance appointments.

#### Item 6 Supervision

Burt Snover's investment advice is supervised by the Investment Committee. The performance results of each account are monitored at least monthly, which assesses the quality and consistency of investment advice given to each client.

Burt Snover is the Chief Compliance Officer, and can be reached at 866-539-4186 with any questions or concerns.

**Part 2B of Form ADV: *Brochure Supplement***

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**J.C. Waller III**

Co-Chief Investment Officer

6710 Horizon Road #100  
Heath, TX 75032  
866-539-4186

04/16/2012

**This brochure supplement provides information about J.C. Waller III, Co-Chief Investment Officer, which supplements the Fund Architects' brochure. You should have received a copy of that brochure. Please contact the IAR Support Team at 866-539-4186 if you did not receive Fund Architects' brochure or if you have any questions about the contents of this supplement.**

**Additional information about J.C. Waller III is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

Item 2 Educational Background and Business Experience

**J.C. Waller III, Co-Chief Investment Officer**

Born 1968

Post-Secondary Education:

Southwestern Oklahoma State University – 1990, Bachelors of Science

University of Denver – 2003, International MBA

University of Denver – 2005, Masters of Science in Finance

Recent Business Background:

Advised Assets Group, LLC., Senior Director, Plan Advisory Services , 05/2011 to 04/2012

Sherwood Investment Management, LLC., 04/2011 to 07/2011

Old Mutual Capital, Senior Director of Investments, 10/2007 to 01/2011

ICON Advisers, Inc., Vice President of Investments, 09/2000 to 05/2007

Item 3 Disciplinary Information

The supervised person has no disciplinary or legal actions against him.

Item 4 Other Business Activities

Waller Properties, LLC., Member since 08/2006. Non-investment business that owns a single-family property as a rental. No time spent during business hours.

Item 5 Additional Compensation

J.C. Waller III receives rental property income from Waller Properties, LLC.

Item 6 Supervision

J.C. Waller III's investment advice is supervised by the Investment Committee. The performance results of each account are monitored at least monthly, which assesses the quality and consistency of investment advice given to each client. Burt Snover, President and Chief Compliance Officer, is directly responsible for J.C. Waller III's supervision. Burt can be reached at 866-539-4186 with any questions or concerns.

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**Xianghai Henry Ma, Ph.D., CFA ®**

Chief Market Strategist

6 Ivy Circle  
Wellesley, Massachusetts 02482  
866-539-4186

04/16/2012

**This brochure supplement provides information about Henry Ma, Ph.D., CFA ®, Chief Market Strategist, which supplements the Fund Architects' brochure. You should have received a copy of that brochure. Please contact the IAR Support Team at 866-539-4186 if you did not receive Fund Architects' brochure or if you have any questions about the contents of this supplement.**

**Additional information about Henry Ma, Ph.D., CFA ® is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

Item 2 Educational Background and Business Experience

**Henry Ma, Ph.D., CFA ®, Chief Market Strategist**

Born 1966

Post-Secondary Education:

Beijing University, Beijing China – 1991, BA/MA, Finance and Economics

Boston University – 1996, Ph.D., Economics

Recent Business Background:

Julex Capital Management, Founder/Portfolio Manager, 2010 - Present

Fidelity Investments, Global Macro Portfolio Manager, 2007 - 2010

To earn the Chartered Financial Analyst ® designation, you must successfully pass through the CFA ® Program, a graduate-level self-study program that combines a broad curriculum with professional conduct requirements, culminating in three sequential exams. The primary goal of the CFA Program is to enable charterholders to become an effective investment professional by teaching them investment concepts and principles.

Item 3 Disciplinary Information

The supervised person has no disciplinary or legal actions against him.

Item 4 Other Business Activities

Henry is owner of Julex Capital Management, LLC., a consulting firm which offers market insight and commentary to its subscribers free of charge.

Item 5 Additional Compensation

Henry does not receive any other compensation at this time.

Item 6 Supervision

Henry Ma's investment advice is supervised by the Investment Committee. The performance results of each account are monitored at least monthly, which assesses the quality and consistency of investment advice given to each client. Burt Snover, President and Chief Compliance Officer, is directly responsible for Henry Ma's supervision. Burt can be reached at 866-539-4186 with any questions or concerns.



**Part 2B of Form ADV: *Brochure Supplement***

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**Jun Zhu, Ph.D., CFA ®**

Portfolio Manager

893 Camino Ricardo  
Moraga, CA 94556  
866-539-4186

04/16/2012

**This brochure supplement provides information about Jun Zhu, Ph.D., CFA ®, Portfolio Manager, which supplements the Fund Architects' brochure. You should have received a copy of that brochure. Please contact the IAR Support Team at 866-539-4186 if you did not receive Fund Architects' brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jun Zhu, Ph.D., CFA ® is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 Educational Background and Business Experience

### **Jun Zhu, Ph.D., CFA ®, Portfolio Manager**

Born 1963

Post-Secondary Education:

XIAN JIAOTONG UNIV., P.R. China – 1985, Bachelors of Science, Mechanical Engineering

Princeton University – 1990, MPA, Economics and Public Policy

Princeton University – 1993, Ph.D., Public Affairs

Recent Business Background:

AXA Rosenberg, Senior Research Associate, 1998 to 2010

Crystal Investment Management, Chief Investment Officer, 2010 to Current

To earn the Chartered Financial Analyst ® designation, you must successfully pass through the CFA ® Program, a graduate-level self-study program that combines a broad curriculum with professional conduct requirements, culminating in three sequential exams. The primary goal of the CFA Program is to enable charterholders to become an effective investment professional by teaching them investment concepts and principles.

## Item 3 Disciplinary Information

The supervised person has no disciplinary or legal actions against him.

## Item 4 Other Business Activities

Jun Zhu, Ph.D., CFA ® is a Registered Investment Advisor in the state of California as a sole proprietor, and markets his services under the DBA Crystal Investment Management. A conflict of interest may exist where Mr. Zhu can offer his services as a Registered Investment Advisor in California, or as an Investment Advisor Representative of Fund Architects, LLC. Mr. Zhu is prohibited from soliciting any existing Fund Architects clients to his RIA firm. Mr. Zhu is Portfolio Manager for similar models at both firms, which may have different fee structures.

## Item 5 Additional Compensation

Mr. Zhu receives asset-based and performance fees from Crystal Investment Management. Performance based fees are only charged to those individuals or investors who qualify as 'high net worth.'

## Item 6 Supervision

Jun Zhu's investment advice is supervised by the Investment Committee. The performance results of each account are monitored at least monthly, which assesses the quality and consistency of investment advice given to each client. Burt Snover, President and Chief Compliance Officer, is directly responsible for Jun Zhu's supervision. Burt can be reached at 866-539-4186 with any questions or concerns.