



Firm Brochure

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Jack Patterson & Co. If you have any questions about the contents of this brochure, please contact us at: 305-648-3080, or by email at: jack@pattersonadvisors.com. 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 Jack Patterson & Co. is available on the SEC's website at www.adviserinfo.sec.gov

March 26, 2012

Jack Patterson & Co.

United States Securities and Exchange Commission Form ADV Part 2A

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

This Brochure is an updated document to the original brochure published in March of 2011, in response to the new final rule issued by the U.S. Securities and Exchange Commission in July 2010, requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 305-648-3080 or by email at: jack@pattersonadvisors.com.

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Advisory Business

Firm Description

Jack Patterson & Co., (“Jack Patterson” or “the firm” or “we”) is a Registered Investment Advisory firm. The firm was established as a corporation formed under the laws of the State of Florida in 2003, registered as an Investment Adviser with the United States Securities and Exchange Commission in 2009, and starting in 2012 as a State Registered Investment Advisor with the State of Florida. Individuals associated with Jack Patterson & Co. provide investment advisory services. These individuals are appropriately licensed, qualified, and/or authorized to provide advisory services on Jack Patterson & Co.’s behalf. Such individuals are known as Investment Adviser Representatives (IARs).

Jack Patterson & Co. offers personalized investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities. Advice is provided through consultation with the Client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Jack Patterson & Co. is a fee-based financial planning and investment management firm. The firm could collect commissions with services relating to life and long term care insurance.

A written evaluation of each Client's initial situation is provided to the Client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the Client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the Client on an as-needed basis. Conflicts of interest will be disclosed to the Client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the Client.

Principal Owners

Jack Patterson, CFP is the principal owner and President of The Firm.

Types of Advisory Services

Jack Patterson & Co. provides investment supervisory services, also known as asset management services, and furnishes investment advice through consultations.

On more than an occasional basis, Jack Patterson & Co. furnishes advice to Clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of December 31st, 2011, Jack Patterson & Co. manages approximately \$25 million in assets for our Clients, all of which is managed on a discretionary basis.

Tailored Relationships

The goals and objectives for each Client are documented in our Client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without Client consent.

Types of Agreements

Clients may establish Financial Planning, Portfolio Management, Asset Allocation, or Consulting Service agreements with Jack Patterson & Co.

Financial Planning Agreement

Financial planning services will typically involve providing a variety of services, principally advisory in nature, to Clients regarding the management of their financial resources based upon an analysis of their individual needs. An IAR of Jack Patterson & Co. will first conduct a complimentary initial consultation. After the initial consultation, if the Client decides to engage Jack Patterson & Co. for financial planning services, an IAR will conduct follow up meetings as necessary, during which pertinent information about the Client's financial circumstances and objectives is collected. Once such information has been reviewed and analyzed, a written financial plan – designed to achieve the Clients' stated financial goals and objectives – will be produced and presented to the Client. The primary objective of this process is to allow Jack Patterson & Co. to assist the Client in developing a strategy for the successful management of income, assets, and liabilities in meeting the Client's financial goals and objectives.

The financial plan may include, but is not limited to: a net worth statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of

insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Financial plans are based on the Client's financial situation at the time the plan is presented and are based on financial information disclosed by the Client to Jack Patterson & Co. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. Past performance is in no way an indication of future results. Jack Patterson & Co. cannot offer any guarantees or promises that the Client's financial goals and objectives will be met. As the Client's financial situation, goals, objectives, or needs change, the Client must notify Jack Patterson & Co. promptly.

Jack Patterson & Co. charges a fixed fee of \$450 if prospective client elects to proceed with the creation of a financial plan. Financial planning fees are payable as invoiced.

The Client may terminate the financial planning agreement within five business days of the date of acceptance without penalty.

Portfolio Management Agreement

Jack Patterson & Co. offers discretionary and in limited circumstances, non-discretionary portfolio management services where the investment advice provided are tailored to meet the needs and investment objectives of the Client. The Firm offers an initial consultation in which pertinent information about the Client's personal and financial circumstances and objectives is collected, and the scope of the engagement is determined.

Where Jack Patterson & Co. enters into discretionary arrangements with Clients, Jack Patterson & Co. will be granted discretion and authority to manage the Client's account subject to any written guidelines that the Client may provide. Accordingly, Jack Patterson & Co. is authorized to perform various functions, at the Client's expense, without further approval from the Client. Such functions may include the determination of securities and the amount of securities to be purchased or sold. Once the portfolio is constructed, Jack Patterson & Co. provides continuous supervision and rebalancing of the portfolio as changes in market conditions and Client circumstances may require.

For non-discretionary portfolio management services, Jack Patterson & Co. will periodically monitor the Client's assets and will provide recommendations as to the Client's asset allocation. The Client is free at all times to accept or reject any investment recommendation from Jack Patterson & Co. For non-discretionary portfolio management, Jack Patterson & Co. will implement recommendations only upon obtaining Client approval.

Asset Allocation Review Services

Jack Patterson & Co. provides discretionary or non-discretionary investment recommendations and consulting services where the investment advice provided is custom tailored to meet the needs and investment objectives of the Client. As part of this service, Jack Patterson & Co. will gather information about the Client's financial situation and objectives, and assist the Client in determining their investment goals, objectives, risk tolerance, and retirement plan time horizon. Where Jack Patterson & Co. will not manage the Client's assets directly, but will provide recommendations as to the Client's asset allocation. These services mainly pertain to employer sponsored plans, such as 401k, 403b, deferred compensation, and other defined contribution plans. Generally, Jack Patterson & Co. will receive duplicate account statements from the Client and will monitor the Client's account on a periodic basis to ensure the account remains aligned with the Client's stated financial objectives. The Client is free at all times to accept or reject any investment recommendation from Jack Patterson & Co.

Jack Patterson & Co. charges a fixed fee for asset allocation review services. The fee is based on the size, asset composition and complexity of the Client account. The exact fee will be determined at the start of the service and clearly set forth in the agreement for services signed by the Client and the Firm.

The Client may terminate the asset allocation review services agreement within five days of the date of execution without penalty to the Client. After the five-day period, either party may terminate the agreement by providing a written notice to the other party.

Pension Consulting Services

Jack Patterson & Co. will provide pension consulting services to employee benefit plans, the plan sponsors and fiduciaries (collectively, the "Sponsor") based upon an analysis of the needs of the plan. In general, these services may include an existing plan review, formation of an investment policy statement, assisting the Sponsor in fund selection and investment options, investment performance monitoring, risk management education, and/or ongoing consulting. Additionally, Jack Patterson & Co. will offer the Sponsor assistance in setting up a relationship with a third party administrator and processing enrollment forms. Jack Patterson & Co. may also offer communication and education services to provide meaningful information regarding the retirement plan to its Participants. Information provided to participants in the educational seminars will be limited to general, impersonal advice.

Pension consulting services will be provided pursuant to the agreement entered into and within the parameters set forth in the plan documents. Where the Sponsor engages Jack Patterson & Co. to provide advice to participants on

an individual basis, such advice will be limited to general retirement planning issues, and fund selection and asset allocation of plan assets.

Plan Participants who wish to engage Jack Patterson & Co. for individualized financial planning or consulting services outside the scope of the qualified plan may do so by executing a separate agreement, including separate fees and fee payment arrangements, with Jack Patterson & Co.

The scope of these services, the fees, and the terms of the agreement for these services will be negotiated on a case-by-case basis with each Sponsor. The Firm may be compensated by a fee based on percentage of assets, or a combination of fee arrangements based on the complexity of the plan and the agreement with the Sponsor. In any case, Jack Patterson & Co. will not have access to plan funds for payment of fees without written consent. The terms regarding payment of fees, termination, and refunds will be clearly set forth in the agreement executed between the Firm and the Sponsor. The Firm will not receive additional compensation beyond the consulting fees for its pension consulting services.

All accounts are regulated under ERISA. Jack Patterson & Co. will provide consulting services to the Sponsor and the Participants as described above. The named Sponsor must make the ultimate decision as to retaining Jack Patterson & Co. for pension consulting services. The Sponsor is free to seek independent advice about the appropriateness of any recommended services for the plan.

Jack Patterson & Co. or the Sponsor may terminate the pension consulting agreement within five business days of the date of acceptance without penalty to the Client. After the five-day period, either party may terminate the pension consulting agreement by providing written notice to the other party. The Sponsor may incur a charge for services rendered prior to such termination.

Asset Management

Assets are invested primarily in equities (stocks), exchange traded funds, bonds, corporate debt securities, commercial paper, certificates of deposit, municipal securities, and options contracts. Client assets are held custody primarily through discount brokers.

Investments may also include: no-load or low-load mutual funds, warrants, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, futures contracts, and interests in partnerships.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying Jack Patterson & Co. in writing.

Jack Patterson & Co. may terminate any of the aforementioned agreements at any time by notifying the Client in writing.

Fees and Compensation

Description

The annual fee for portfolio management services is billed quarterly in advance based on the market value of the assets on the last day of the preceding quarter. Fees will be assessed pro rata in the event the portfolio management agreement is executed at any time other than the first day of a calendar quarter. The fee is based on a percentage of assets under management and is not negotiable. Fee percentage rates are structured according to the amount of assets managed (portfolio size), and the Client's risk profile (conservative, moderately conservative, moderate risk class and higher). The Client's risk profile is determined by their overall tolerance for risk, a measure of how much of their assets will be invested in cash, fixed income, and equities. The annualized fees for portfolio management services are based on the following blended fee schedule. Fees are net of a 0.15% credit for no online access:

Fees for Clients of Asset Management

Portfolio Size	Asset Management Fee		
	Conservative	Moderately Conservative	All Else
First \$250,000	0.79%	1.05%	1.45%
Next \$250,000	0.79%	0.95%	1.25%
Next \$250,000	0.65%	0.78%	1.00%
\$750,000 to \$10,000,000	0.58%	0.76%	0.76%
Cap at \$10,000,000	0.58%	0.76%	0.76%

The Firm may allow accounts of members of the same household to be aggregated for purposes of determining the advisory fee and/or meeting the minimum account size. The Firm may allow such aggregation, for example, where the Firm services accounts on behalf of minor children of current Clients, individual and joint accounts for a spouse, and other types of related accounts.

Jack Patterson & Co. will either invoice Clients directly for portfolio management fees, or payment of the Firm's management fees will be made by the qualified custodian holding the Client's funds and securities provided that the Client provides written authorization permitting the fees to be paid directly from their account. Jack Patterson & Co. will not have access to Client funds for payment of fees without Client consent in writing. Further, the qualified custodian agrees to deliver an account statement directly to the Client showing

all disbursements from the account on at least a quarterly basis. The Client is encouraged to review their account statements for accuracy. Jack Patterson & Co. will receive a duplicate copy of the statement that was delivered to the Client.

Fees for Clients of Employer Plan Asset Allocation and Investment Selection Services

Account Size	Service Fee
	Monthly Fee
Less than \$300,000	\$89
\$300,000 to \$600,00	\$135
\$600,000 to \$900,000	\$190
Over \$900,000	\$240

The Client may terminate the portfolio management agreement within five days of the date of execution without penalty to the Client. After the five-day period, either party may terminate the agreement by providing written notice to the other party.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain securities and investments (mutual funds, exchange-traded funds, stock, and fixed income). These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Expense Ratios

Advice offered by Jack Patterson & Co. may involve investment in mutual funds. Clients are hereby advised that all fees paid to Jack Patterson & Co. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

Jack Patterson & Co. reserves the right to stop work on any account that is more than 30 days overdue. In addition, Jack Patterson & Co. reserves the right

to terminate any financial planning engagement where a Client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Jack Patterson & Co.'s judgment, to providing proper financial advice.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities. Jack Patterson & Co. does not charge performance-based fees.

Types of Clients

Description

Jack Patterson & Co. generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

Client relationships vary in scope and length of service.

Account Minimums

Jack Patterson & Co. generally requires a minimum of \$250,000 to open and maintain a portfolio management account. However, this account minimum may be waived at the discretion of Jack Patterson & Co. if, for example, the Client appears to have significant potential for increasing assets under management. Also in its discretion, Jack Patterson & Co. may combine household Client accounts to meet the stated minimum.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, subscriptions to research software programs and platforms, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

The primary investment strategy used on Client accounts is tactical asset allocation with both a fundamental and technical approach. We actively manage Clients' assets using individual stocks, exchange-traded funds, and fixed income securities (certificates of deposit and individual bonds) as the core investments. We employ sector rotation strategies and reserve the right to overweight certain sectors and positions as we deem fit to maximize returns and opportunities relative to the Client's risk tolerance. Portfolios can also be globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Each Client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Jack Patterson & Co. do not represent, warrant, or imply that the services or methods of analysis employed by the Firm can or will predict future results, successfully identify market tops or bottoms, or insulate Clients from losses due to market corrections or declines.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Tax Risk:** The Firm's asset management programs may involve above-average portfolio turnover which could negatively impact upon the net after-tax gain experienced by the Client in non-qualified accounts.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present Firm investment Clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

Jack Patterson & Co. is a licensed insurance agency and offers a variety of insurance services and products to its Clients. IARs of Jack Patterson & Co. may be licensed to sell insurance products through the Firm and may receive normal and customary commissions for such activities. Clients are hereby advised that all compensation received by IARs in their capacities as insurance agents, is separate and distinct from compensation received for investment advice. Clients to whom the Firm offers advisory services are informed that

they are under no obligation to use the Firm for insurance services and may use the insurance brokerage firm and/or agent of their choosing.

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

Code of Ethics

Jack Patterson & Co. has adopted a Code of Ethics, the full text of which is available to Clients and prospective Clients upon request. Jack Patterson & Co. has several goals in adopting this Code. First, the Firm desires to comply with all applicable laws and regulations governing its practice. The management of Jack Patterson & Co. has determined to set forth guidelines for professional standards, under which all associated persons of Jack Patterson & Co. are to conduct themselves. Jack Patterson & Co. has set high standards, the intention of which is to protect Client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith and fair dealing with Clients. In addition, Jack Patterson & Co. maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Jack Patterson & Co. or any person associated with the Firm.

Participation or Interest in Client Transactions

Jack Patterson & Co. and its employees may buy or sell securities that are also held by Clients. Employees may not trade their own securities ahead of Client trades.

Personal Trading

The Chief Compliance Officer of Jack Patterson & Co. is Jack Patterson. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that Clients of the firm receive preferential treatment.

Brokerage Practices

Selecting Brokerage Firms

Jack Patterson & Co. recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Jack Patterson & Co. may recommend that Clients establish brokerage accounts with one or more brokerage firms, particularly discount brokerage firms, to maintain custody of the Client's assets and to effect trades for their accounts.

Clients are advised that there may be transaction charges involved when purchasing or selling securities. Jack Patterson & Co. does not share in any portion of the brokerage fees/transaction charges imposed by such brokerage firms. Additionally, while Jack Patterson & Co. seeks to recommend custodians with the most reasonable trading fees, the commission/transaction fees charged may be higher or lower than those charged by other broker-dealer/custodians.

Custodians and brokerage firms selected by Jack Patterson & Co. will provide the firm with access to its institutional trading and operations services, which are typically not available to regular retail investors at those firms. These services generally are available to independent investment advisers at no charge to them so long as a total of at least \$10 million of the adviser's Clients account assets are maintained at that firm. Services provided by such brokerage firms may include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require significantly higher minimum initial investments. Some custodians and brokerage firms may also make available to Jack Patterson & Co. other products and services that benefit Jack Patterson & Co. but may not benefit its Clients' accounts. These include software and other technology that provide access to Client account data (such as trade confirmations and account statements), facilitate trade execution, provide research, pricing information and other market data, facilitate payment of Jack Patterson & Co.'s fees from its Clients' accounts, and assist with back-office support, recordkeeping and Client reporting.

Directed Brokerage

In limited circumstances and at the Firm's discretion, some Clients may instruct Jack Patterson & Co. to use one or more particular brokers for the transactions in their accounts. Clients who may want to direct the Firm to use a particular broker should understand that this may prevent Jack Patterson & Co. from effectively negotiating brokerage compensation on their behalf and may also prevent Jack Patterson & Co. from obtaining the most favorable net price and execution. Moreover, Clients that direct brokerage may incur additional costs for performance reporting. Thus, when directing brokerage business, Clients should consider whether the commission expenses, execution, clearance, and settlement capabilities that they will obtain through their broker are adequately favorable in comparison to those that Jack Patterson & Co. would otherwise obtain for its Clients.

Best Execution

Jack Patterson & Co. reviews the execution of trades at each custodian each quarter. The review is documented in the Jack Patterson & Co. Compliance

Manual. Trading fees charged by the custodians is also reviewed on a quarterly basis. Jack Patterson & Co. does not receive any portion of the trading fees.

Best execution is not measured solely by reference to commission rates. Paying a broker a higher commission rate than another broker might charge is permissible if the difference in cost is reasonably justified by the quality of the brokerage services offered.

Research and Other Soft Dollar Benefits

Jack Patterson & Co. does not have any commitments or understandings to trade with specific brokers or to generate a specified level of brokerage commission with a particular broker in order to receive brokerage or research services. These commitments or understandings are generally known as soft dollar arrangements. Certain brokers through whom Jack Patterson & Co. executes trades may provide unsolicited proprietary research to us. This research is used for all client accounts, even though certain clients may not have paid direct commissions to the brokers who provided the research. This research could include a wide variety of reports, charts, publications or proprietary data on economic and political strategy, credit analysis, or stock and bond market conditions and projections.

Order Aggregation

Jack Patterson, CFP generally will aggregate orders with respect to a security if such aggregation is consistent with achieving best execution for the various Client accounts. When orders are aggregated, each participating account, including proprietary accounts, will receive the weighted average share price for all transactions in a particular security effected to fill such orders on a given business day. Transaction costs will be shared pro rata based upon each account's participation in the transaction.

Review of Accounts

Periodic Reviews

Account reviews are performed at least annually by advisors Jack Patterson, CFP and Carlos Rodriguez. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a Client's own situation.

Regular Reports

Jack Patterson, CFP will review the Client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the Client.

Investment Management Clients receive periodic communications on at least an annual basis. The written updates may include a net worth statement, portfolio statement, and a summary of objectives and progress towards meeting those objectives.

Client Referrals and Other Compensation

Compensation for Client Referrals

Jack Patterson & Co. currently does not have a relationship where we provide compensation for Client referrals.

Custody

Account Statements

Jack Patterson & Co. does not custody assets. All assets are held at qualified custodians, of which the Client can use an existing qualified custodian, or we can recommend an appropriate qualified custodian. The custodians provide account statements directly to Clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Jack Patterson & Co.

Investment Discretion

Discretionary Authority for Trading

Jack Patterson & Co. accepts discretionary authority to manage securities accounts on behalf of Clients. Jack Patterson & Co. has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, the Firm's investment authority may be subject to specified investment objectives, guidelines, and/or conditions imposed by the Client. For example, a Client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio

and/or restrictions or prohibitions of transactions in the securities of a specific industry. Jack Patterson & Co. will also consult with the Client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. The Client signs a limited power of attorney so that we may execute the trades on the Client's behalf.

Voting Client Securities

Proxy Votes

Jack Patterson & Co. will not vote proxies on behalf of Client accounts.

Although on rare occasions and only at the Client's request, Jack Patterson & Co. may offer Clients advice regarding corporate actions and the exercise of proxy voting rights.

Financial Information

Financial Condition

Jack Patterson & Co. does not have any financial impairment that will preclude the firm from meeting contractual commitments to Clients.

A balance sheet is not required to be provided because Jack Patterson & Co. does not serve as a custodian for Client funds or securities, and does not require prepayment of fees of more than \$1,200 per Client, and six months or more in advance.

Business Continuity Plan

General

Jack Patterson & Co. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all Clients within five days of a disaster that dictates moving our office to an alternate location.

Information Security Program

Information Security

Jack Patterson & Co. maintains an information security program to reduce the risk that your personal and confidential information may be breached.

The Firm restricts internal access to nonpublic personal information about the Client to those employees who need to know that information in order to provide products or services to the Client. As emphasized above, it has always been and will always be the Firm policy never to sell information about current or former customers or their accounts to anyone. It is also the Firm's policy not to share information unless required to process a transaction, at the request of a customer, or as required by law.

Privacy Notice

Jack Patterson & Co. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a Client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

Jack Patterson & Co. requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Jack Patterson, CFP

Educational Background:

- Year of Birth: 1973
- University of Illinois, Chicago, IL, B.S., Finance, 1997
- Boston University, Certificate of Financial Planning, 2009
- Certified Financial Planner, 2009.

Recent Business Experience:

- Jack Patterson & Co., President, 10/2003 to Present
- Raymond James Financial Services, Inc., Financial Advisor/Branch Manager, 07/2003 to 12/2009

- Wachovia Securities, Inc., Financial Advisor/Vice President, 11/2001 to 07/2003
- WM Financial Services, Financial Advisor, 11/1998 to 11/2001

Disciplinary Information:

- The firm and its employees have not been involved in legal or disciplinary events related to past or present Firm investment Clients.

Other Business Activities:

- Jack Patterson & Co. is a licensed insurance agency and offers a variety of insurance services and products to its Clients. Jack Patterson is licensed to sell insurance products through the Firm and may receive normal and customary commissions for such activities.

Additional Compensation:

- Jack Patterson does not receive any compensation from anyone not considered a client for providing advisory services.

Supervision:

- Jack Patterson is the Chief Compliance Officer for Jack Patterson & Co. and does not have a supervisor.

Arbitration Claims:

- No past or existing arbitration claims regarding Firm past or current clients to be disclosed.

Self-Regulatory or Administrative Proceedings:

- No past or existing proceedings to be disclosed.

Bankruptcy Petition:

- No past or existing bankruptcies to be disclosed.

Carlos A. Rodriguez

Educational Background:

- Year of Birth: 1983
- Florida State University, Tallahassee, FL, B.S., Finance, 2004

Recent Business Experience:

- Jack Patterson & Co., Investment Advisor Representative, 12/2009 to Present
- Raymond James Financial Services, Inc., Financial Advisor, 11/2004 to 12/2009

Disciplinary Information:

- The firm and its employees have not been involved in legal or disciplinary events related to past or present Firm investment Clients.

Other Business Activities:

- Jack Patterson & Co. is a licensed insurance agency and offers a variety of insurance services and products to its Clients. Carlos Rodriguez is licensed to sell insurance products through the Firm and may receive normal and customary commissions for such activities.

Additional Compensation:

- Carlos Rodriguez does not receive any compensation from anyone not considered a client for providing advisory services.

Supervision:

- Carlos Rodriguez is supervised by Jack Patterson, President and Chief Compliance Officer for Jack Patterson & Co.

Arbitration Claims:

- No past or existing arbitration claims regarding Firm past or current clients to be disclosed.

Self-Regulatory or Administrative Proceedings:

- No past or existing proceedings to be disclosed.

Bankruptcy Petition:

- No past or existing bankruptcies to be disclosed.