

DOUBLE DIAMOND INVESTMENT GROUP, LLC

2001 Route 46, Suite 506

Parsippany, NJ 07054

A SEC Registered Advisory Firm¹

FIRM BROCHURE, MARCH 2012

This brochure provides information about the qualifications and business practices of Double Diamond Investment Group, LLC (“Double Diamond”). If you have any questions about the content of this brochure, please contact us at 973-352-6680. 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.

¹ SEC or State registration does not and should not imply any certain level of skill or training.

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MATERIAL CHANGES

There were no material changes to Double Diamond's investment advisory services or personnel.

ADVISORY BUSINESS

Investment Management Services:

Double Diamond provides investment management services on a discretionary and non-discretionary basis according to the client's investment objectives and the terms and conditions of the Advisory Agreement with the client. Double Diamond's investment management primarily utilizes proprietary Portfolio Models in order to achieve investment results consistent with clients' investment objectives. The following models are described below:

A) Separate Independent Manager Program:

Double Diamond will generally invest client's assets on a discretionary basis amongst selected separate independent money managers in order to maximize investment returns while achieving lower volatility within pre-determined risk parameters. These separate managers will perform investment management services on a discretionary basis. Double Diamond will utilize independent money managers from Fidelity Brokerage Services, LLC Separate Manager Platform, as well as well as outside of this platform.

B) Mutual Fund Portfolio Program:

Double Diamond shall invest client's assets utilizing multiple style boxes to achieve proper diversification while arranging the portfolio according to Double Diamond's desired model to assure proper risk tolerance.

C) Double Diamond's Managed Account Program

Double Diamond will design an investment program based on the needs of the client to achieve a specific investment goal. The portfolio is designed specifically to meet that investment goal. This portfolio is also designed to provide an additional layer of diversification for clients that also are invested in both of the above strategies.

Double Diamond also provides boutique advisory services to contracting companies that generally work on publicly financed projects (e.g bridges, roads). Double Diamond provides investment management of retainage dollars so that the contracting companies can receive investment income and/or appreciation during the retainage period.

Other Terms & Conditions:

All Double Diamond clients' enter into an *Investment Advisory Agreement* setting forth the terms and conditions under which Double Diamond shall manage the client's assets and a separate custodial/clearing agreement for each designated broker-dealer/custodian. Both the Double Diamond's *Agreement* and the custodial/clearing agreement authorize the custodian to debit the client's account in the amount of Double Diamond's advisory fee and remit same. The Agreement between Double Diamond and the client will continue in effect until terminated by either party. In the event the client terminates Double Diamond's services, the balance of any unearned fee, if any, shall be refunded to the client.

FEES AND COMPENSATION

Investment Management Engagement:

Double Diamond's investment management fee schedule ("Advisory Fees") for accounts managed by Double Diamond is based on a percentage of assets (generally net of any debit balances) and is set forth below. The Advisory Fees represent the highest fee that may be charged absent special circumstances:

<u>Account Assets</u>	<u>Annual Fee</u>
First \$3 million of assets	2.00%
All assets in excess of \$3 million	1.75%

Double Diamond's Advisory Fees shall also be prorated and paid monthly or quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. Double Diamond's actual fees may be negotiated and a client may pay more or less than similar clients depending on the particular circumstances of the client, which may include considerations related to size of the client's account, additional and/or differing levels of service or as negotiated. Clients that negotiate fees may end up paying a higher fee than that set forth in the fee schedules above as a result of fluctuations in the client's assets under management and/or account performance.

Double Diamond will generally recommend a broker-dealer/custodian for client's investment management assets. In addition to the investment management fee, the client may incur brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual securities transactions). In addition, the client will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). Client may also incur additional investment management fees assessed by independent managers in Double Diamond's Separate Independent Manager Program.

PERFORMANCE-BASED FEES and SIDE-BY-SIDE MANAGEMENT

Double Diamond does not charge performance based fees.

TYPES OF CLIENTS

Double Diamond provides investment advisory services to the following clients:

- Individuals and High Net Worth Individuals;
- Trusts, Estates, Charitable Organizations;
- Corporations
- Pension Plans & 401(k)

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Double Diamond seeks to provide income and/or appreciation by applying tactics that provide a substantial portion of the market's upside while simultaneously reducing a portfolio's downside. This may include reducing a position's size as that asset class substantially appreciates or may include increasing a position should the opposite occur. In addition, proper diversification should also alleviate much of the volatility. It also includes constant monitoring of market trends that may affect a portfolio.

Double Diamond does not guarantee the future performance of any account or any specific level of performance, the success of any investment decision or strategy that Double Diamond may use, or the success of Double Diamond's overall investment management. All investment decisions are subject to various market, currency, economic, political, and business risk, and those investment decisions will not always be profitable. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify Double Diamond if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Double Diamond's previous recommendations and/or services.

DISCIPLINARY INFORMATION

Double Diamond and its personnel **have not been** convicted, pled guilty or nolo contendere ("no contest"), been named, charged or been the subject of any order or judgment by any court of competent jurisdictions, SEC or any Self Regulatory Organization (e.g., FINRA) for the any of the following offenses:

- investments or investment related business;
- fraud, false statements or omissions;
- violation of any investment related statute or regulation or SRO rules;
- wrongful taking of property, bribery, perjury, forgery, counterfeiting;
- extortion or conspiracy to commit any of these offenses.

In addition, Double Diamond and its personnel **are not** the subject of any pending matters in connection with any of the above-identified offenses.

OTHER FINANCIAL INDUSTRY AFFILIATIONS

Double Diamond is not affiliated with any other financial institution.

Licensed Insurance Representatives:

Double Diamond's Advisory Affiliates, in their individual capacities, are licensed insurance producers and may recommend the purchase of certain insurance products to its clients. Although Double Diamond does not sell insurance products, it permits its Advisory Affiliates as licensed insurance producers, to sell insurance products to its investment advisory clients. A conflict of interest exists to the extent that Double Diamond's Advisory Affiliates recommend the purchase of insurance products and receive insurance commissions or additional compensation as a result. Such conflict is disclosed at time of sale and in this Brochure to the client.

Registered Representative of Broker-Dealer:

Double Diamond's Advisory Affiliates, in their individual capacities are registered representatives of Comprehensive Asset Management and Servicing, Inc. ("Comprehensive"), an SEC registered broker-dealer and member of FINRA. Brokerage commissions may be charged by Comprehensive to effect securities transactions and thereafter, a portion of these commissions may be paid by Comprehensive to Double Diamond's Advisory Affiliates. Prior to effecting any transactions, the client will be required to enter directly into an account agreement with Comprehensive. The brokerage commissions charged by Comprehensive may be higher or lower than those charged by other broker-dealers. In addition, certain of the Double Diamond's Advisory Affiliates may also receive additional ongoing 12b-1 fees from the mutual fund company.

A conflict of interest exists to the extent that the Double Diamond recommends the purchase of securities wherein its Advisory Affiliates receive commissions or other additional compensation as a result of clients purchasing securities based upon such recommendations.

For ERISA Accounts, Double Diamond will offset its advisory fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Registrant's Advisory Affiliates in their individual capacities as registered representatives of Comprehensive.

**CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND
PERSONAL TRADING**

Double Diamond or related persons may own an interest in, or buy and sell for their own account, the same securities that may also be held, purchased or sold in client accounts. In all cases, clients' orders are given priority. In no case shall the adviser or associate receive a better price or more favorable circumstance than a client. All associate trades of this type are made for long-term investment objectives and are not intended to benefit from short-term market effects. In some cases the adviser may buy or sell a specific security for their own account, which the adviser does not consider appropriate for client accounts.

Double Diamond has implemented an investment policy relative to personal securities transactions. This investment policy is part of Double Diamond's overall Code of Ethics which serves to establish a standard of business conduct for all of Double Diamond's Associated Persons that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, Double Diamond also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Double Diamond or any person associated with Double Diamond.

Double Diamond has adopted procedures to implement the firm's policy on personal securities transactions and reviews to monitor and ensure the firm's policy is observed, implemented properly and amended or updated, as appropriate.

BROKERAGE PRACTICES

1. Research and Other Soft Dollar Benefits:

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Double Diamond may receive from a broker-dealer/custodian (or a mutual fund company), without cost (and/or at a discount) support services and/or products, certain of which assist Double Diamond to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the Double Diamond may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Double Diamond in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received assist Double Diamond in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Double Diamond to manage and further develop its business enterprise.

Double Diamond's clients do not pay more for investment transactions effected and/or assets maintained at a particular broker-dealer/custodian as a result of this arrangement. There is no corresponding commitment made by Double Diamond to any particular broker-dealer/custodian or to any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

2. Brokerage for Client Referrals:

Double Diamond does not receive client referrals from any broker-dealer custodian.

3. Directed Brokerage:

The client may direct Double Diamond to use a particular broker-dealer (subject to Double Diamond's right to decline and/or terminate the engagement) to execute some or all transactions for the client's account. In such event, the client will negotiate terms and arrangements for the account with that broker-dealer, and Double Diamond will be unable to seek better execution services or prices from other broker-dealers or be able to "bunch" the client's transactions with orders for other client's accounts managed by Double Diamond. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Double Diamond seeks to execute orders for its clients fairly and equitably. Double Diamond follows written procedures pursuant to which it may, and to the extent consistent with Best Execution, combine purchase or sale orders for the same security for multiple clients (sometimes called "***bunching***") so that they can be executed at the same time. The procedures for bunching trades may differ depending on the particular strategy or type of investment. Double Diamond is

not requires to bunch or aggregate orders if it determines that bunching or aggregating is not practical.

When client orders are bunched by Double Diamond, the order will be placed with the broker-dealer custodian for execution. When a bunched order is completely filled, Double Diamond generally will allocate the securities purchased or proceeds of sale among participating accounts based on the purchase or sale order. Adjustments or changes may be made by Double Diamond under certain circumstances, such as to avoid odd lots or excessively small allocations. If the bunched order is filled at different prices, through multiple trades, generally all such participating accounts will receive the average price. When a bunched order is partially filled, Double Diamond's procedures provide that the securities are to be allocated in a manner deemed fair and equitable to clients. Securities must be allocated proportionately based upon the relative size of the particular client's pre-trade designation.

REVIEW OF ACCOUNTS

Account reviews are conducted on an ongoing basis by Double Diamond's registered representative and principal, Andrew Bodner. All investment management clients are required to discuss with him their investment objectives, needs and goals and to keep him informed of any changes. All clients are encouraged to meet at least annually with the adviser to comprehensively review financial planning issues, including investment objectives and performance.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian of the client accounts. Double Diamond may provide a quarterly report summarizing account activity, positions and performance.

CLIENT REFERRALS AND OTHER COMPENSATION

Double Diamond does not have any contractual engagement with any solicitors or pay any compensation for the receipt of client referrals.

CUSTODY

Double Diamond does not maintain custody of client assets. All client assets are custodied with nationally recognized, SEC registered and FINRA member broker-dealer/custodians.

INVESTMENT DISCRETION

Double Diamond provides advisory services on a discretionary and non-discretionary basis. As such, prior to engaging Double Diamond to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with Double Diamond setting forth the terms and conditions under which Double Diamond shall manage client's assets.

VOTING CLIENT SECURITIES

Double Diamond does not vote client proxies. Double Diamond's clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Double Diamond and the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

With respect to shareholder class action litigation and similar matters, Registrant generally will not make any filings in connection with any shareholder class action lawsuits involving securities currently or previously held in clients' accounts. Registrant recommends that its clients promptly review these materials, as they identify important deadlines and may require action in the client's part. Registrant will not be required to notify third party custodians or clients who utilize third party custodians of shareholder class action lawsuits and similar matters.

FINANCIAL INFORMATION

Based upon Double Diamond's business practices, use of a qualified custodian and advisory fee procedures, the SEC does not require the disclosure of financial information. Please be advised that there are no known financial conditions that would impair Double Diamond's ability to meet contractual commitments to clients.

DOUBLE DIAMOND INVESTMENT GROUP, LLC

2001 Route 46, Suite 506

Parsippany, NJ 07054

A SEC Registered Advisory Firm²

Supervised Persons

Andrew Bodner, President

BROCHURE SUPPLEMENT, MARCH 2011

This brochure supplement provides information about the investment advisory representatives that supplements Double Diamond Investment Group, LLC (“Double Diamond”) brochure. You should have received a copy of that brochure. Please contact Double Diamond at (973) 352-6680 if you did not receive Double Diamond’s brochure or if you have any questions about the content of this supplement.

Additional information about the above-referenced Supervised Persons is available on the SEC’s website at www.adviserinfo.sec.gov.

² SEC or State registration does not and should not imply any certain level of skill or training.

ANDREW BODNER

1) **Educational and Business Background:**

Birth Date: 3/12/1965

- **Education:**

Rider University, B.S. Commerce, 1987
Certified Financial Planner, ("CFP") 2005

- **Business Background:**

UBS Wealth Management, First Vice President, 1992 – 2009
GMS Group, Assistant Vice President, 1987-1992

2) **Disciplinary Information:**

Mr. Bodner ***has not been*** convicted, pled guilty or nolo contendere ("no contest"), been named, charged or been the subject of any order or judgment by any court of competent jurisdictions, SEC or any Self-Regulatory Organization (e.g., FINRA) for the any of the following offenses:

- investments or investment related business;
- fraud, false statements or omissions;
- violation of any investment related statute or regulation or SRO rules;
- wrongful taking of property, bribery, perjury, forgery, counterfeiting;
- extortion or conspiracy to commit any of these offenses.

Mr. Bodner ***is not*** the subject of any pending matters in connection with any of the above-identified offenses.

3) **Other Business Activities:**

Andrew Bodner is a registered representative of Comprehensive Asset Management and Servicing, Inc. In this capacity Mr. Bodner will receive commissions on the sale of certain securities products. In addition, Mr. Bodner is a licensed insurance producer and may receive commissions on the sale of insurance products.

4) **Additional Compensation:**

Mr. Bodner does not receive any additional compensation from any non-client for providing advisory services.

5) **Supervision:**

Double Diamond generally requires that all investment advisors have acquired, at a minimum, a college degree with a major in finance or accounting, and a designation relative to investments such as Certified Public Account (CPA), Certified Financial Planner (CFP) and Chartered Financial Analyst (CFA).

Andrew Bodner is responsible for the supervision of Double Diamond's investment advisory representatives (IARs). Mr. Bodner's supervision includes a review of correspondence, (e.g., email, letters), advertising, client accounts statements and such other documentation to ensure that Double Diamond's IARs are conducting themselves in accordance with its compliance and supervisory procedures and applicable investment advisory rules and regulations.