

Part 2A of Form ADV: Firm Brochure

January 1, 2012

Johnson's Global Advisors Corp.

600 17th Street Suite 2800

Denver, CO 80202

720-222-5007 [www.johnsonsglobaladvisors](http://www.johnsonsglobaladvisors.com)

This Brochure provides information about the qualifications and business practices of Johnson's Global Advisors Corp. If you have any questions about the contents of this Brochure, please contact us at info@johnsonsglobaladvisors.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.

Johnson's Global Advisor Corp, is an State registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Johnsons Global Advisors Corp, also is available on the SEC's website at www.adviserinfo.sec.gov CRD # 152757

ITEM 2 – MATERIAL CHANGES

Johnson's Global Advisors Corp, as of the implementation of this current brochure has a material change relative to location. We have moved our offices from 200 West 17th Street Cheyenne, WY 82001 to 600 17th Street Suite 2800 Denver, CO

ITEM 3.

TABLE OF CONTENTS

ITEM 1 - COVER PAGE

ITEM 2 - MATERIAL CHANGES

ITEM 3 - TABLE OF CONTENT

ITEM 4 - ADVISORY BUSINESS

ITEM 5 - FEES AND COMPENSATION

ITEM 6 - PREFORMANCE BASED FEES

ITEM 7 - TYPE OF CLIENTS

ITEM 8 - METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

ITEM 9 - DISCIPLINARY INFORMATION

ITEM 10 - OTHER FINANCIAL ACTIVITIES AND AFFILIATIONS

ITEM 11 - CODE ETHICS

ITEM 12 - BROKERAGE PRACTICES

ITEM 13 - REVIEW OF ACCOUNTS

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

ITEM 15 - CUSTODY

ITEM 16 - INVESTMENT DISCRETION

ITEM 17 - VOTING CLIENT SECURITIES

ITEM 18 - FINANCIAL INFORMATION

Our Brochure is also available on our web site www.johnsonsglobaladvisors.com The SEC's web site also provides information about any persons affiliated with Johnson's Global Advisors Corp, who are registered or are required to be registered as an investment adviser representatives.

ITEM 4.

ADVISORY BUSINESS

Johnson's Global Advisors Corp, is a privately owned Colorado Corporation headquartered in Denver, CO. The principal owner is Martin V. Johnson Jr. Chief Executive Officer, we have been in business since January 2010, our initial inception registered as an investment advisor was with the State of Illinois securities Commission.

Advisory Services Offered

We provide our clients with low cost investment management services with respect to their investment accounts . We manage accounts on a discretionary basis, which means our clients give us the authority to buy and sell securities for their accounts at our discretion ("discretionary authority"). We do not provide services on a non-discretionary basis. Johnson's Global Advisors Corp, has the ongoing responsibility to select and make recommendations, based upon the objectives of the client, as to specific securities or other investments that we purchase or sell in client accounts.

Johnson's Global Advisors Corp, provides portfolio management services to clients through managing portfolios designed to mimic the holdings and allocations of various published indices, blended indices and customized indices. The majority of portfolios Johnson's Global Advisors Corp. manages for its clients invest exclusively in global/international equities and fixed income indexing utilizing strategies whose objective is tracking the client specified index, available through Separately Managed accounts.

Johnson's Global Advisors Corp, specializes in managing well-balanced and globally-diversified client accounts. We use stock and bond index funds, mutual funds and ETFs that have similar characteristics as index funds. Index funds are mutual funds or ETFs that aim to achieve the same return as a particular market index or asset class. We offer our investment management services to our clients by managing client accounts according to the particular model investment

strategy selected by the client. We apply the client's selected investment strategy based on the client's general financial and tax situation typically formed as a trust or limited liability company.

Johnsons Global Advisors Corp, provides its portfolio management services to individuals, banks and thrift institutions, investment companies, pension plans, profit sharing plans, trusts, endowments, charitable organizations, and corporations. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio or to customize the portfolio's goals and objectives.

Each portfolio is designed to track the performance in the client's account to reflect changes with in the index. There will typically be some variation between the performance of a client's account and the index it is designed to track, due to client-imposed trading restrictions, client contributions to and withdrawals from accounts, timing of trades, timing of cash flows resulting from mergers and acquisitions affecting portfolio holdings , advisory fees and trading costs among other factors.

Current List of product

LARGE CAP INDEX PRODUCTS

MID-CAP INDEX PRODUCTS

S&P 500

S&P 400

S&P 100

Russell Mid-Cap Equal Weighted

S&P 500

Russell Mid-Cap Growth/Value

Enhanced Large-Cap Index

S&P 500 Growth/Value

FIXED INCOME PRODUCTS

Russell Top 200 Core Bond Index

Russell Top 200 Growth

Russell Top 200 Value

Russell 1000

Russell 1000 Growth/Value

SMALL-CAP INDEX PRODUCTS SPECIALTY PRODUCTS

S&P 600* Completeness

Russell 2000 Customized Screens

Russell 2000 Growth/Value Customized Tax Efficient

Small-Cap Equal Weighted

Sudan-Free

Tobacco-Free

INTERNATIONAL INDEX PRODUCTS

ADR Index Fund

BROAD MARKET INDEX PRODUCTS

S&P 1500

Russell 3000

Wilshire 5000

MSCI US IMI

ITEM 5. Fees

\$1.00

to

\$500,000

0.90% annually

\$500,001

to

\$1,000,000

0.80%

\$1,000,001

to

\$2,000,000

0.60%

\$2,000,001

to

\$3,000,000

0.40%

\$3,000,001

to

\$5,000,000

0.20%

Above \$5,000,000 Negotiable

We have no minimum annual management fees

Termination of Agreement

A client agreement may be cancelled at any time, by either party, for any reason upon receipt of 30 days written notice, or such other period as may be agreed upon, in writing, by the parties. Upon termination of any account, any prorated amount of fee due will be charged. In the event that there are any prepaid, unearned fees, they will be promptly refunded to the client. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement. In the event of a client's death or disability, we will continue management of the account until an authorized party notifies us of client's death or disability and provides alternate instructions.

Billing Method

Our investment management fees are charged and payable quarterly in arrears following the end of each calendar quarter. The fee is based on the daily average value of the Assets under Management for each "Client Relationship" during the quarter. The formula used for the calculation is as follows: $(\text{Daily Average Value of Assets under Management During The Quarter}) \times (\text{A Factor Equal To The Number of Days In The Calendar Quarter}) / (\text{The Number of Days in the Calendar Year}) \times (\text{Annual Fee Rate})$. We will aggregate client accounts that have family or business relationships with each other for purposes of calculating the investment management fees.

For purposes of calculating fees, a "Client Relationship" means an individual and: (a) his or her spouse or domestic partner; (b) his or her minor children; (c) a business or non profit entity over which the individual and/or other person defined in (a) above exercises exclusive control; and (d) trust as to which the individual and/or other person defined in (a) above is the sole trustee.

The calculation is based on the actual number of days assets were in a clients' account during the calendar quarter. The formula used to calculate new and terminating client account investment management fees is as follows: $(\text{Daily average value of assets under management during the pro-rata quarter}) \times (\text{a factor equal to the number of days assets were in a client's account in the calendar quarter}) / (\text{the number of days in the calendar year}) \times (\text{annual fee rate})$.

For investment management fee calculation purposes, a calendar quarter is a period beginning on the first day of the month during a new calendar quarter (January, April, July and October) and ending on the last day of the month of a calendar quarter (March, June, September and December). A day is any calendar day including weekends and holidays. We will automatically withdraw our investment management fee from each client's account at Scottrade. Scottrade withdraws investment management fees from the client's account based on our instruction. Upon termination, we will instruct Scottrade to debit all outstanding unpaid investment management fees.

All clients will receive brokerage statements from Scottrade no less frequently than quarterly. The Scottrade statement will show the deduction of the investment management fee withdrawn directly from their account. We will mail all clients an invoice for withdrawn investment management fees showing account values and fee calculations. We do not require or accept investment management fees in advance.

Other Fees and Expenses

Our investment management fees do not include Scottrade fees. Clients pay all brokerage commissions (transaction fees), stock transfer fees, and/or other similar charges incurred in connection with transactions in accounts from the assets in the accounts. We describe additional information about brokerage in brokerage practices below in addition, any mutual fund shares and/or ETFs held in a client's account will be subject to fund related fees and expenses that are described in the prospectus of the mutual fund or ETF. All fees paid to Johnson's Global Advisors Corp, for investment management services are separate and distinct from the fees and expenses charged by index funds, mutual funds and ETFs.

Other Compensation

Johnson's Global Advisors Corp, nor any person providing investment advice on its behalf ("investment personnel"), accepts any compensation or revenue in connection with the management of client accounts, except for the investment management fees charged directly to clients as stated in the Fee Schedule above.

ITEM 6. PERFORMANCE BASED FEES

Johnson's Global Advisors Corp, nor any of its investment personnel, does not charges performance-based fees that are based on a share of capital gains on, or capital appreciation of, the assets of a client.

ITEM 7. TYPES OF CLIENTS

We offer discretionary investment management services to, high net worth individuals, trusts, estates, endowments, institutions, and individual participants of retirement plans.

Account Requirements

Johnson's Global Advisors Corp, has no minimum clients fee requirements. We combine family accounts as defined as Client Relationship to meet the minimum client account size. We reduce fees or waive the account minimum requirements at our discretion.

ITEM 8.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Johnson's Global Advisors Corp, generally use diversification in an effort to optimize the risk and potential return of a portfolio. More specifically, we utilize multiple asset classes, investment styles, market capitalizations, sectors, and regions to provide diversification. Johnson's Global Advisors Corp, general investment strategy is to seek a total return proportionate with the level of risk the client decides to take.

We assist each client in developing an Investment Policy Statement, which typically outlines the client's general financial situation, investment objectives, liquidity needs, time horizon, return objective, and risk tolerance, as well as any special considerations and/or restrictions the client chooses to place on the management of the client accounts. We will then make model investment strategy recommendations that are consistent with the client's Investment Policy Statement.

Client accounts with a similar investment objectives and asset allocation goals **may** own the same or different securities. Tax factors also influence investment decisions. Clients who buy or sell securities on the same day may receive different prices based on the timing of the transactions during open market hours. Each client will maintain a target asset allocation.

Johnson's Global Advisors Corp, utilizes Exchange Traded Funds and full index replication techniques, whenever possible, in which all or substantially all equities in the appropriate index (or product specific portion of the index) are held in the client's portfolio, subject to client-imposed restrictions, in the appropriate allocations.

Generally, we review client accounts quarterly to evaluate the extent to which the actual allocation matches the target allocation. When we consider the variance excessive, based on an upper and lower limit band that is subject to change at our discretion, we will take appropriate actions (by buying or selling securities) to bring the actual allocation within acceptable range of the target allocation. We refer to this process as "rebalancing." The process of rebalancing offers a systematic process to buy or sell securities when investment categories (asset classes) vary from its target.

Methods of Analysis for Selecting Securities

In analyzing portfolios, index funds, and exchange-traded funds (ETF's), Johnson's Global Advisors Corp, use various sources of information, product provided by website, and other online and subscription resources as needed. There can be no assurance that any such strategy or analysis will prove profitable or successful.

Risk of Loss Considerations

Prior to entering into an Investment Management Agreement with Johnson's Global Advisors Corp. each client should carefully consider:

1. That investing in securities involves risk of loss, which clients should be prepared to bear.
2. That securities markets experience varying degrees of volatility.
3. That over time, the client's assets may fluctuate and at any time be worth more or less than the amount invested.
4. That client's should only commit assets that are long-term in nature. This is typically a minimum of a ten-year time horizon. There can be no guarantee that an asset allocation strategy will meet its investment objectives or that it will not suffer losses.

Specific Risks of Securities

Exchange Traded Funds (ETFs)

An ETF is a type of investment company (usually, an open-end fund or unit investment trust) containing a basket of stocks or bonds that usually tracks a specific index or sector. An ETF is similar to an index fund in that it will primarily invest in securities of companies that are included in a selected market index or that fall into a particular sector. Unlike traditional mutual funds, which can only be redeemed at the end of a trading day, ETFs trade throughout the day on an exchange.

Like stock and bond mutual funds, the prices of the underlying securities and the overall market may affect ETF prices. Similarly, factors affecting a particular industry segment may affect ETF prices that track specific sectors. An investment in an ETF could lose money over short or even long periods. You should expect the ETFs share price and total return to fluctuate within a wide range, like the fluctuations of the overall stock market.

Index Fund

Indexing" is a passive form of fund management that has been successful in outperforming most actively managed mutual funds. While the most popular index funds track the S&P 500, a number of other indexes, including the Russell 2000 (small companies), the DJ Wilshire 5000 (total stock market), the MSCI EAFE (foreign stocks in Europe, Australasia, Far East) and the Lehman Aggregate Bond Index (total bond market) are widely used for index funds. Investing in an index fund is a form of passive investing. The primary advantage to such a strategy is the lower management expense ratio on an index fund. Also, a majority of mutual funds fail to beat broad indexes, such as the S&P 500.

Different Types of Funds

When it comes to investing in mutual funds and ETFs, investors have literally thousands of choices. Most mutual funds and ETFs fall into one of three main categories: money market funds, bond funds (also called "fixed income" funds), and stock funds (also called "equity" funds). Each type has different features and different risks and rewards. Generally, the higher the potential return, the higher the risk of loss.

Bond Funds

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields. Unlike money market funds, the SEC's rules do not restrict bond funds to high quality or short term investments. Because there are many different types of bonds, bond funds can vary dramatically in their risks and rewards.

Some of the risks associated with bond funds include: Credit Risk credit risk refers to the risk that companies or other issuers may fail to pay their debts (including the debt owed to holders of their bonds). Consequently, this affects mutual funds and exchange-traded funds (ETFs) that hold these bonds. Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury Bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.

Interest Rate Risk Interest rate risk refers to the risk that the market value of bonds will go down when interest rates go up. Because of this risk, investors can lose money in any bond fund, including those that invest only in insured bonds or U.S. Treasury Bonds. Funds that invest in longerterm bonds tend to have higher interest rate risk.

Prepayment Risk

Issuers may choose to pay off debt earlier than the stated maturity date on a bond. For example, if interest rates fall, a bond issuer may decide to "retire" its debt and issue new bonds that pay a lower rate. When this happens, the bond fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

Stock Funds

A stock fund's value can rise and fall quickly (and dramatically) over short or even long periods. You should expect a fund's share price and total return to fluctuate within a wide range. Overall "stock market risk" poses the greatest potential danger for investors in stock funds. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. Stock prices can fluctuate for a broad range of reasons—such as the overall state of the economy or demand for particular products or services.

Not all stock funds are the same, for example: small Cap Funds Funds that invest in stocks of small companies involve additional risks. Smaller companies typically have higher risk of failure, and are not as established as larger companies. Historically, smaller company stocks have experienced a greater degree of market volatility than the overall market average.

International Funds Funds that invest in foreign securities involve special additional risks. International investments are subject to stock market risk as well as additional risks, including currency fluctuation, political instability, country/regional risk, and potential illiquid markets.

Emerging Market Funds

Emerging market investments involve stock market risk and the same risks as international investments. Investing in emerging markets may accentuate those risks.

Real Estate Investment Trust (REIT) Funds

REIT Funds include REITs within the underlying fund holdings. REITs primarily invest in real estate or real estate-related loans. Equity REITs own real estate properties, while mortgage REITs hold construction, development, and/or long-term mortgage loans. REIT investments include illiquidity and interest rate risk.

ITEM 9. DISCIPLINARY INFORMATION

Johnson's Global Advisors Corp, nor it's principal owner Martin V. Johnson Jr. CEO, does not have any disciplinary information to disclose.

ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We do not have any relationships or arrangements with brokerdealers, mutual funds, other investment advisers, or other entities that create any material conflict of interest for us in rendering investment management services to our clients. As noted below under "Client Referrals and Other Compensation," we may periodically recommend that a client consult an unaffiliated individual or firm for specific professional services, such as financial planning, estate planning, or accounting related work, but we receive no compensation or other monetary benefit for making such referrals. It is possible that such individual or firm will refer clients to us, but we pay no compensation for, and have no arrangement regarding, such referrals.

ITEM 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

Johnson's Global Advisors Corp. believes that we owe clients the highest level of trust and fair dealing. As part of our fiduciary duty, we place the interests of our clients ahead of the interests of Johnson's Global Advisors Corp, and our personnel. Our personnel are required to conduct themselves with integrity at all times and follow the principles and policies detailed in our Code of Ethics. We attempt to address specific conflicts of interest that either we have identified or that could likely arise.

Our personnel are required to follow clear guidelines from the Code of Ethics in areas such as gifts and entertainment, other business activities, and adherence to applicable state and federal securities laws. Additionally, investment personnel who make securities recommendations to clients, or who have access to nonpublic information regarding any client's purchase or sale of securities, are subject to personal trading policies governed by the Code of Ethics (see below).

Johnson's Global Advisors Corp, prohibits all personnel from acting upon any material, non-public information, as defined under federal securities laws and our Code of Ethics insider trading policy. Johnson's Global Advisors Corp, does not recommend securities in which there is a material financial interest to us or any related person of Johnson's Global Advisors Corp,. We will provide a complete copy of the Code of Ethics to any client or prospective client upon request.

Personal Trading Practices

Johnson's Global Advisors Corp, and our personnel does purchase or sell securities for themselves, regardless of whether the transaction would be appropriate for a client account. Johnson's Global Advisors Corp, and our personnel will at times purchase or sell securities for themselves that we also recommend to clients. In order to avoid potential conflicts of interest with clients, we require all investment personnel to obtain written approval by our Chief Compliance Officer Martin V. Johnson Jr. before directly or indirectly trading in any security thus avoiding any chances of front running securities.

Written approval may be obtained from our Director of Johnson's Global Advisors Corp, Martin V. Johnson Jr.. In order to avoid potential conflicts of interest with securities transactions in client accounts, Johnson's Global Advisors Corp. and personnel are subject to a pre-clearance policy that seeks to make personal trading consistent with our fiduciary duty to clients. However Johnson's Global Advisors Corp, and our personnel are not required to pre-clear transactions in open-end investment companies (mutual funds) that would not adversely affect client interests. ETFs are required to be pre-cleared prior to investment personnel buy or sell transactions.

ITEM 12. BROKERAGE PRACTICES

Factors Considered in Selecting Broker-Dealers for Client Transactions

Johnson's Global Advisors Corp, generally requires that individual clients open one or more brokerage accounts in their own names at Scottrade a registered broker-dealer, Member SIPC and institutional clients with their current custodian or with the custodian of their choosing. The individual clients will enter into a separate agreement to custody assets at Scottrade. Johnson's Global Advisors Corp, also requires that each client grant Johnson's Global Advisors Corp, a limited power of attorney to execute client transactions. Johnson's Global Advisors Corp, is independently owned and operated, and unaffiliated with Scottrade, Scottrade will charge brokerage commissions (transaction fees and/or ticket charges) for executing securities transactions.

We do not receive any part of these separate charges, Scottrade provides us with access to their institutional trading and custody services platform, which is typically not available to Scottrade retail investors. Scottrade services include brokerage custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. We consider several factors in recommending Scottrade to clients, such as ease of use, reputation, service execution, pricing

and financial strength. Johnson's Global Advisors Corp, also take into consideration the availability of the products and services received or offered.

Research and Other Soft Dollar Benefits

Scottrade makes available to us other products and services that benefits Johnson's Global Advisors Corp, but **may** not directly benefit our clients' accounts. These types of services will help us in managing and administering client accounts. These include software and other technology that provide access to client account data (i.e. trade confirmations and account statements); facilitate trade executions; provide research, pricing information, and other market data; facilitate in the payment of our fees from client accounts; and assist with back-office functions, record keeping, and client reporting.

Many of these services are used to service all or a substantial number of our client accounts. We place trades for our clients' accounts subject to our duty to seek best execution and other fiduciary duties. We do use broker-dealers other than Scottrade to execute trades for client accounts maintained at Scottrade, but this practice may result in additional costs to clients, therefore we are more likely to place trades through Scottrade rather than other broker-dealers. Scottrade execution quality is different from that of other broker-dealers.

Scottrade also provides us with other benefits and services such as client appreciation and educational events, and conferences on regulatory compliance, information technology, and business enterprise development. Scottrade discounts or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to Johnson's Global Advisors Corp, these benefits and services are not a material consideration for us in requiring clients use Scottrade as a broker-dealer, however result in any material conflicts of interest between us and clients.

As part of our fiduciary duty to clients, Johnson's Global Advisors Corp, endeavors at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by Johnson's Global Advisors Corp, in and of itself again creates a conflict of interest and indirectly influence our recommendation of Scottrade for custody and brokerage services. Johnson's Global Advisors Corp. does not receive client referrals, nor compensation or revenue from any broker-dealer or third party in exchange for using that broker-dealer or third party.

Directed Brokerage

We do not allow individual clients to direct us to use a specific broker-dealer to execute transactions. Individual Clients must use the broker-dealers that Johnson's Global Advisors Corp. recommends. Not all investment managers or advisers require their clients to trade through specific brokerage firms. Since we require all of our clients accept our institutional clients to maintain their accounts with Scottrade, it is also important for clients to consider and compare the significant differences between having assets custody at another broker-dealer, bank or other custodian prior to opening an account with Scottrade. Some of these differences include, but are

not limited to total account costs, trading flexibility, transaction fee/commission rates, and security and technology services.

By requiring clients to use Scottrade, Johnson's Global Advisors Corp, believes we are be able to more effectively manage client accounts, achieve favorable execution of client transactions, and overall lower the costs to the client accounts. In seeking best execution through a broker-dealer on behalf of our clients, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution. When taking into consideration qualitative execution, we consider the full range of broker-dealer services, such as: historical relationship, reputation, financial strength, execution capability, commission and/or transaction rates, and responsiveness.

Aggregation and Allocation of Transactions

In most cases, Johnson's Global Advisors Corp, will recommend the purchase or sale of the same security for multiple clients at the same time. In those cases, Johnson's Global Advisors Corp, combines buy and sell orders for all clients with the same security transaction order. These are sometimes referred to as "block" transactions. Block transactions are typically done in an effort to get better trade execution across multiple client accounts.

Johnson's Global Advisors Corp, will generally allocate the securities or proceeds arising out of those transactions on an average price basis among the various participants in the transactions. We believe that combining orders in this way will be advantageous to all participating clients. However, the average price could be less advantageous to a particular client than if that client had been the only account affecting the transaction, or if the transaction had been completed before or after the other clients.

Johnson's Global Advisors Corp, also place orders for the same security for different clients at different times and in different relative amounts due to, among other things, differences in investment objectives, cash availability, size of order, and practicality of participating in "block" transactions. The level of participation by different clients in the same security may also be dependent upon other factors relating to the suitability of the security for the particular client.

There are circumstances when some of a client's transactions in the security will not be aggregated with those of other clients. Johnson's Global Advisors Corp, has adopted policies and In addition, Johnson's Global Advisors Corp, and/or investment personnel buys or sell specific securities for our own accounts that are not deemed appropriate for another client at the time, based on personal investment considerations that differ from the considerations as to which, investment decisions for the client are made.

ITEM 13.

REVIEW OF ACCOUNTS

Managed Account Reviews

We manage client accounts on a continuous basis and generally review all positions in client accounts at least quarterly. Martin V Johnson Jr. Portfolio Manager conducts internal monthly reviews of client accounts for adherence to a client's Investment Policy Statement. We also offer account reviews directly with a client on an as-requested basis. Clients may choose to receive reviews in person (local in our office), by telephone, or by email. Reviews mainly focus on changes to a client's Investment Policy Statement which include: a change in the client's investment objectives, general financial situation, tax considerations and material cash deposits or withdrawals in client accounts.

Account Reporting

Each client receives a written quarterly statement from the custodian that includes an accounting of all holdings and transactions in the account for the reporting period. In addition, Johnson's Global Advisors Corp, provides written reports detailing performance in client accounts on a quarterly basis. We may also provide additional reporting as agreed upon with the client on a case by case basis.

ITEM 14.

CLIENT REFERRALS AND OTHER COMPENSATION

Solicitor

Johnson's Global Advisors Corp. does not currently utilize unaffiliated solicitors.

Outside Compensation

Johnson's Global Advisors Corp, refers clients or prospective clients to unaffiliated professionals for specific needs such as financial planning, estate planning, or accounting related work. Johnson's Global Advisors Corp, does not have any agreements or formal referral arrangements with individuals or companies to whom we refer clients or prospective clients, and we do not receive any compensation for these referrals.

At times, it is possible that Johnson's Global Advisors Corp. will receive reciprocal referrals from these professionals. Johnson's Global Advisors Corp, only refers clients to professionals we believe are competent and qualified in their field. However, it is ultimately the client's responsibility to review the professional.

We will generally provide the client with the professional's contact information, and it is solely the client's decision whether to engage the professional. Clients are under no obligation to purchase any products or services through these professionals, and we have no control over the services they provide. Clients that choose to engage these professionals will sign a separate agreement with them. Fees charged by these professionals are separate from and in addition to

fees charged by Johnson's Global Advisors Corp.

If the client desires, Johnson's Global Advisors Corp. will work with these professionals or the client's other advisers (such as an accountant, attorney or financial planner) to help ensure that the professional understands the client's portfolio and to coordinate services for the client. Johnson's Global Advisors Corp. will never share information with an unaffiliated professional unless first authorized by the client.

ITEM 15. CUSTODY

Johnson's Global Advisors Corp, has limited custody/constructive custody of client funds or securities, when clients authorize us to deduct our investment management fees directly from their accounts. A qualified custodian Scottrade holds our clients' accounts, clients will receive statements directly from the qualified custodian at least monthly. The statements will reflect each client's funds and securities held with the qualified custodian as well as any transactions that occurred in the account, including the deduction of our investment management fee.

Clients should carefully review the account statements received from the qualified custodian. When clients receive performance reports from Johnson's Global Advisors Corp, as well as from the qualified custodian, clients should compare these two reports carefully. Clients with any questions about their statements and reports should contact us at the address or phone number on the cover of this brochure. Clients who do not receive statements from the qualified custodian at least quarterly should also notify us.

ITEM 16. INVESTMENT DISCRETION

Johnson's Global Advisors Corp. has full discretion to decide the specific securities to trade, the quantity of such securities, and the timing of securities transactions for client accounts. Johnson's Global Advisors Corp. will not contact clients before placing trades in their accounts, but clients will receive confirmations directly from the broker-dealer and/or qualified custodian Scottrade for any trades placed.

Clients grant us discretionary authority in the Investment Management Agreement they sign with us. Clients also give us trading authority over their accounts when they sign the custodians Scottrade paperwork. Certain client-imposed conditions may limit our discretionary authority, such as when the client prohibits transactions in specific security types.

ITEM 17. VOTING CLIENT SECURITIES

Proxy Voting

Johnson's Global Advisors Corp, accepts and has the authority to vote client proxies pertaining to

securities held in a client's account. We will vote all proxies in favor of proposals and recommendations of the management of the companies held. Any client who disagrees with this policy reserves the right to vote their own proxies. A client may request to vote their own proxies by sending a written request to our main office address listed on the cover page of this brochure.

Although it is highly unlikely, it is possible that Johnson's Global Advisors Corp, is called on to vote a proxy in a situation that cause a conflict of interest. If any vote would cause a possible conflict of interest, we will contact the client for consent prior to casting a vote on behalf of a client. Information regarding how the proxies pertaining to the client's account voted can be obtained from Johnson's Global Advisors Corp, by sending a written request for the information to our main office address listed on the cover page of this brochure.

Mutual Funds

The investment adviser that manages the assets of a registered investment company (i.e., mutual fund) generally votes proxies issued on securities held by the mutual fund.

Class Actions

Johnson's Global Advisors Corp, does not instruct or give advice to clients on whether or not to participate as a member of class action lawsuits and will not automatically file claims on a client's behalf. However, if a client notifies us that the client wishes to participate in a class action, we will provide the client with any transaction information pertaining to the client's account needed for the client to file a proof of claim in a class action.

ITEM 18.

FINANCIAL INFORMATION

Registered investment advisers are required to provide a balance sheet if they require or solicit prepayment of more than \$500,00 in fees per client, six months or more in advance. Johnson's Global Advisors Corp, does not require or solicit the prepayment of more than \$500,00 in fees per client, six months or more in advance, and does not foresee any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to clients under our Investment Management Agreements. We have never been the subject of a bankruptcy petition.