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Form ADV, Part 2A  
Brochure  
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This Brochure provides information about the qualifications and business practices of Seven Two Partners LLC ("Seven Two"). If you have any questions about the contents of this Brochure, please contact Nicholas Rotello, Founder at [nrotello@72partners.com](mailto:nrotello@72partners.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority.

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

## **Item 2 – Material Changes**

No material changes to report.

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#### **Item 4 – Advisory Business**

Seven Two Partners was founded in 2009. The firm provides non-discretionary investment consulting services to clients. Services include investment policy design/review; asset allocation & diversification modeling and analysis; investment manager due diligence, monitoring, and recommendation; periodic performance reporting; and other investment related non-discretionary services. Seven Two does not have custody of client funds or securities, does not accept discretionary authority to manage assets on behalf of clients, and does not accept authority to vote client securities.

Seven Two is 100% owned by its founder, Nicholas Rotello.

#### **Item 5 – Fees and Compensation**

Seven Two's only source of revenue is the fixed consulting fees it charges clients. Fees are determined on a case-by-case basis but factors such as complexity of investments, assets under advisement, and specific services requested are taken into account when determining client fees. The consulting fee is billable in advance. Seven Two does not have a set fee schedule. Seven Two's fees do not include management fees, transaction costs, custodial fees, or any other fees that are charged by other service providers.

Seven Two's consulting agreements allow either party to terminate at any time, upon prior written notice. If an account is terminated, Seven Two will prorate any pre-paid fees and refund the amount outstanding.

#### **Item 6 – Performance-Based Fees and Side-by-Side Management**

Neither Seven Two, nor its employees accept performance based fees

#### **Item 7 – Types of Clients**

Seven Two provides services to a wide variety of clients including high net worth individuals, tax-exempt organizations, and trusts.

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

Seven Two recommends investment managers to clients. These managers invest across asset classes globally (including limited partnerships). All investment involves the risk of loss that clients should be prepared to bear. Clients should review offering documents for each investment to receive more detail on manager specific risk.

Seven Two conducts due diligence on investment managers taking into account both quantitative, and qualitative factors. Quantitative factors include a review of historical

performance, exposures, leverage, volatility, correlation, drawdown's, and up/down market performance among other things. Qualitative factors include investment philosophy, background/experience of people involved, identification of conflicts, and back-office reviews among others.

#### **Item 9 – Disciplinary Information**

Seven Two and its employees are not involved in any legal or disciplinary events.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

Neither Seven Two nor its employees are involved in any other financial industry activities or affiliated with any relationship or arrangement that is material to Seven Twos' consulting business.

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

Seven Two has adopted a Code of Ethics which sets forth ethical standards of business conduct that the firm requires of its employees. The Code stresses Seven Two's fiduciary obligations to its clients and our firm desire to maintain zero conflicts of interest. It also establishes policies and procedures to minimize activities that give the appearance of conflicts of interest, and govern personal securities trading.

The Code discourages Access Persons from investing in direct securities. ETF, Mutual Fund, and limited partnership investments are encouraged instead of direct security investments. The Code requires that any business relationships, significant holdings, or relevant positions held by Seven Two employees with regards to investment managers are disclosed to Clients when a recommendation is made.

The Code limits the giving or receiving of gifts with regards to clients, prospective clients, and investment managers and requires that all Access Persons report their personal securities transactions and holdings, as set forth in The Code.

Clients and prospective clients may obtain a copy of Seven Two's Code of Ethics upon request by contacting Nicholas Rotello ([nrotello@72partners.com](mailto:nrotello@72partners.com))

#### **Item 12 – Brokerage Practices**

Seven Two does not select or recommend broker-dealers for client transactions or recommend the reasonableness of their compensation.

### **Item 13 – Review of Accounts**

Client performance is reviewed at least quarterly. Investment Policy, Asset Allocation, Diversification, Risk, and Rebalancing are reviewed with clients at least annually.

### **Item 14 – Client Referrals and Other Compensation**

Seven Two does not directly or indirectly compensate any person who is not an employee of the firm for client referrals. Seven Two's only source of revenue is from client fees from consulting services.

### **Item 15 – Custody**

Seven Two does not have any level of custody of client funds or securities.

### **Item 16 – Investment Discretion**

Seven Two does not accept any amount of discretionary authority from its clients.

### **Item 17 – Voting Client Securities**

Seven Two does not accept authority to vote client securities.

### **Item 18 – Financial Information**

Seven Two has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients, and has not been the subject of bankruptcy protection.

### **Item 19 – Requirements for State Registered Advisors**

Not Applicable.