

# DISCLOSURE BROCHURE

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This Disclosure Brochure provides information about the qualifications and business practices of ThirtyNorth Investments, LLC, which should be considered before investing. Please contact Marcel J. Dupre if you have any questions about the contents of this brochure.

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator.

ThirtyNorth Investments, LLC is a registered investment advisor. The words "registered investment advisor" are not meant to imply any skill or training but is common language used to describe a type of business in the investment management industry in the United States.



## Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an advisor's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Generally, we will notify clients of material changes on an annual basis. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly. In either case, we will notify our clients in a separate document.

For 2011 ThirtyNorth Investments, LLC had no material changes.



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## Advisory Business

ThirtyNorth Investments, LLC (hereinafter referred to as “the Company”, “we”, “us” and “our”) was founded in 1997. The Company is organized under the laws of the state of Louisiana. There are two owners, Advisean Partners, LLC ("Advisean"), which is the majority owner and Marcel J. Dupre. Suzanne T. Mestayer is majority owner of Advisean and is the Chief Executive Officer of the Company. Mr. Dupre is the Chief Investment Officer.

### Mission Statement

The mission of the Company is to expertly build and maintain value for busy and deserving individuals and businesses by managing their investments with their best interests in mind.

### Services Offered

The Company manages discretionary model investment portfolios of mutual funds (or similar type investments) for retail clients, trusts, 401(k) and 403(b) participants, and businesses including both for-profit and non-profit (hereinafter referred to as the “client”). We have found that mutual funds or similar type investments offer the best overall value for the client. Mutual funds offer both us and the client unique cost efficiencies when taking into consideration new purchases, account distributions, wrap fees, trading costs, research costs, taxes, and mainly the ability to ensure all client portfolios are built and maintained in a similar fashion to ensure consistency of results.

We have the following models available for all account types:

- 1) Aggressive - goal is to outperform S&P 500 Index over a long term period
- 2) Moderately Aggressive - goal is to outperform mixture of 80% S&P 500 Index and 20% Barclays Capital Aggregate Bond Index over a long term period
- 3) Moderate - goal is to outperform mixture of 60% S&P 500 Index and 40% Barclays Capital Aggregate Bond Index over a long term period
- 4) Moderately Conservative - goal is to outperform mixture of 40% S&P 500 Index and 60% Barclays Capital Aggregate Bond Index over a long term period
- 5) Conservative - goal is to outperform mixture of 20% S&P 500 Index and 80% Barclays Capital Aggregate Bond Index over a long term period
- 6) Conservative Plus - goal is to outperform Barclays Capital Aggregate Bond Index over a long term period



## Services Offered (Continued)

We understand the importance of trying to help match a client with the correct type of account and the best model portfolio for their situation. We inquire about background, needs, risk tolerance and tax situation of prospective clients. Ultimately the client chooses the type of account and model that is best for them and their circumstances. We manage the investments for them in the same manner our staff manages their own investments.


Our goal varies based upon the model. Investments in the models are generally going to remain within 0-10% of the stock/bond percentages of our benchmarks, but the types of stocks and bonds may vary widely from the benchmarks we are working to outperform. We regularly make tactical changes to models based on where we see the most value globally.

## Strategy

Building and maintaining investment models starts and continues with research on global economics, markets, and historical information. The information comes from a variety of sources including books, periodicals, websites, blogs, wire-houses, mutual fund companies, conference calls and in person meetings at conferences and due diligence meetings. After decisions are made "where" to invest, then the process of screening active and passive strategies is employed and eventually active managers and passive firms are chosen to fit into models. Most active managers are screened on-line, on the phone, and then in-person, preferably at their office. We believe in the importance of knowing the active managers, their staff, where they operate, and other intangibles.

We have a bias towards using active managers on the stock side of models that:

- 1) have a strong track record;
- 2) have a portfolio of stocks of companies that tend to have a lower price/earnings ratio, lower price/book ratio, strong balance sheets, that pay dividends, that have strong cash flow, and other aspects that in general make the portfolio appear to be a good value;
- 3) tend to have smaller assets in the fund; and
- 4) tend to have a smaller number of stocks in their portfolio.



## Strategy (continued)

For passive stock managers we prefer those that have portfolios that are a more fundamentally based process of indexing. We commonly utilize Dimensional Fund Advisors ("DFA") investment options in our models where the trading costs, custody, and other details are attractive for the client.

When choosing active managers on the bond side of models we prefer to use those that have:

- 1) have a strong track record;
- 2) have a portfolio of bonds that is large and well diversified;
- 3) have a portfolio of bonds that tends to be of higher credit quality, and lower duration than their peers;
- 4) employ a strategy to limit risks of principal loss and yet still have a competitive total return.

We may slightly overweight or underweight model portfolios to stock or bond funds based upon our thoughts on the direction of stock or bond markets. This may lead to underperformance for the client or additional risk.

The models range in number of mutual funds (or fund like options) from 1-2 (for brokerage accounts that have assets that are too small for us to break out into models designed for accounts over \$50,000 in value) to as many as 12.

There are many investment management styles that we do not use when managing client portfolios but which may be beneficial to the client individually.



## Assets Under Management

The assets under management for ThirtyNorth Investments, LLC total approximately \$124,805,911 (balances on accounts currently managed as of December 31, 2011). The majority of these assets are held at five different custodians.

The remainder of the assets under management includes assets that the Company may or may not have discretionary authority over and which are sometimes held direct at custodians in which we may or may not have an agreement to take fees. The investments in these accounts are reviewed occasionally by the Company and at times the owner of the account(s) or participants in the retirement plan accounts, communicate with Company or vice versa to discuss the investments.

The majority of accounts that are held with the five main custodians, are discretionary and total \$ 65,567,375. The accounts that are non-discretionary include 401(k) participant accounts as well as assets held outside of the five main custodians that we help monitor and maintain. Asset totals are calculated using end of month figures downloaded from custodians' websites and quarterly paper statements for a few smaller custodial relationships.

Discretionary accounts are those where the client has given specific written authorization to the Company to select securities and execute trades on behalf of that client without obtaining prior consent. Discretion is convenient for busy clients and enables the Company to more efficiently manage investments.

## Fees and Compensation

The overwhelming majority of investment options we use have no trading costs or commissions associated with them but they do have their own internal management costs which varies on a fund by fund basis. Disclosure documents provided by mutual fund companies, annuity providers, and through the custodians' online access for clients and/or that are mailed to clients outline annual fees charged.


Our new fee schedule, effective 1/1/2012 for accounts is as follows.

<u>Retail Account Balance</u>	<u>Annual Fee (charged monthly)</u>
First \$1,000,000	1.00%
Next \$1,000,000 to \$2,499,999.99	.75%
Next \$2,500,000 to \$4,999,999.99	.50%
Next \$5,000,000 plus	.35%

For accounts opened prior to 1/1/2012, pre-existing fee schedules may still apply.

ThirtyNorth Investments, LLC is a licensed insurance agency and persons providing investment advice on behalf of our firm are licensed as independent insurance agents. ThirtyNorth Investments, LLC and these persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.






## Fees and Compensation (continued)

As mentioned above, all investment options in client accounts have internal annual expenses charged by the mutual funds or similar type investment options. These expenses vary from fund to fund and are part of the consideration by the Company when building portfolio models. Also, annuity accounts have mortality and expense charges (example: .55% per year for Monumental Life) and brokerage account custodians sometimes charge annual retirement (IRA, Roth IRA, SIMPLE IRA, SEP IRA) account costs (\$40 a year by Raymond James if "household" balance is below a certain threshold) that are in addition to the annual internal fund expenses charged by mutual funds and similar investments. Brokerage account charges and fees are disclosed in detail to new clients in the Company's new account fee disclosure form. One custodian does charge \$100 for closing an account.

Clients may be able to buy a portfolio of the same or similar mutual funds (or similar type of investments) on their own without incurring a fee for managing such. Some of the investments the Company uses would ordinarily be commissionable products if not purchased through the Company.



## Fees and Compensation (continued)

### 401(k) and 403(b) Plans

The charges for 401(k) and 403(b) accounts vary by plan. In general, the higher the average participant account balance, the lower the fee charged by the Company. Record Keepers, Administrators, and Custodians charge fees in addition to the Company's and some of them share in the annual expenses charged for each investment option.

### Other

Regardless of where an account is held for a client, the Company is not compensated based on the expenses of an investment option. The Company is only compensated for managing accounts directly by the client and our incentive is to grow and protect assets since our fee is based on the balance of client accounts.

The Company's fees are negotiable. We are able to deduct our fee from most accounts on a monthly basis, and in most cases, fees are charged in advance (exceptions are TIAA CREF and First Mercantile accounts). The Company's fees are not charged until the beginning of the month and therefore any period of time between the opening of an account and the beginning of the next month period there are no fees charged. There are no refunds of fees charged if an account is closed in the same month a fee is charged.

### Performance Based Fees (Not Applicable)

### Types of Clients (Account Minimums and Custodians)

The Company does not have any set account minimums and we encourage everyone to save for retirement or other goals. In some cases we dissuade potential clients from investing if they do not have sufficient assets set aside for emergencies or if certain custodial fees, such as an annual fee for an IRA, make it difficult to earn enough to offset the fee unless they are continually making deposits to the account. Types of Clients include individuals, businesses, trusts, 401(k) plans, trusts, foundations and other.

## Account Minimums and Custodians (continued)

In general, we prefer any IRA or Roth IRA accounts to have at least \$5,000 to start or a scheduled regular deposit. Also, for businesses looking to add a retirement plan, in many cases we may discourage creation of a new 401(k) plan based on third party total costs initially and may offer another solution until total assets in the plan reach a threshold where it makes more economical sense for the business and its participants. Also, some custodians have minimums which we must abide by when opening new accounts.

Our current list of custodians include:

TD Ameritrade - ("TD") - retail client accounts (Individual Taxable, Joint Taxable, IRA, Roth IRA, Custodial, Trust, small asset Corporate Retirement Plans) and 401(k)/403(b) plan assets can be held and maintained at TD. TD offers us the ability to create model portfolios of mutual funds and exchange traded funds that we can trade on behalf of the client with \$0 in transaction fees or commissions. We will continuously review our relationship with TD compared with other custodians that offer similar arrangements. Since ultimately our costs are related to our clients' costs, all aspects of trading, maintenance, research, technology, service and other aspects involved with managing our model portfolios are taken into consideration.

Raymond James & Associates, Inc. ("RJ")- retail client accounts (Individual Taxable, Joint Taxable, IRA, Roth IRA, Custodial, Trust, small asset Corporate Retirement Plans) can be opened and maintained as brokerage accounts at RJ. RJ offers us the ability to create model portfolios of mutual funds that we can trade on behalf of the client with \$0 in transaction fees or commissions through their Investment Advisor Division. We pay RJ for technology used to manage accounts. We will continuously review our relationship with RJ compared with other custodians that offer similar arrangements. Since ultimately our costs are related to our clients' costs, all aspects of trading, maintenance, research, technology, service and other aspects involved with managing our model portfolios are taken into consideration.

First Mercantile ("FM") - Corporate retirement plan clients' 401(k) assets can be held at FM. FM offers us the ability to create and maintain models of pooled collective trust investments with no trading costs for purchasing/selling the investment options within a model or account. These investment options are non-proprietary and provide for a good pool of fund managers from which to choose as well as DFA investment options.

## Account Minimums and Custodians (continued)

### First Mercantile (continued)

The models make it easy for participants to have their retirement dollars managed but they can also pick their own investments from a list of 30+ individual non-model choices that we review. First Mercantile also has an investment committee that provides an additional layer of oversight on individual investment options.

Monumental Life Insurance Company ("ML") - ML offers a no-load non-qualified annuity for our clients that may benefit from this type of an account. The minimum investment is \$10,000. ML offers us the ability to create and maintain models of mutual funds inside the annuity contract including proprietary (Transamerica investment options) and non-proprietary choices including DFA funds. They offer a contract that has no commissions or trading costs when we trade investment options in the account.

Teachers Insurance and Annuity Association and College Retirement Equities Fund ("TIAA CREF") - Some clients are employed by a university or other organization that utilizes TIAA CREF as an optional custodian for retirement plan assets. TIAA CREF offers us the ability to create and maintain models of investment options that include both proprietary and non-proprietary choices. They offer a contract that has no commissions or trading costs when we trade investment options in the account.

### Other Custodians

There are other custodians that we don't have agreements with to run our models or take our fees but hold client assets. The Company assists clients with assets held at these "other" custodians because it may not be possible or practical to move the assets due to reasons beyond our control or because of a client request.

### Method of Analysis, Investment Strategies, and Risk of Loss

Our methods for analysis are broken down into two parts:

- 1) Global Economics and Markets;
- 2) Portfolio managers for funds (or similar investments) that we wish to add to models.

For more information on our analysis and strategies, please to "Services Offered" and "Strategies" above from pages 4-7.

All of the investment portfolio models that we manage for clients involve the potential risk of loss of principal. We do not offer any guarantees on any investments that we manage. Of course, the more conservative investment portfolio models are intended to carry less of a risk of loss in the short-term, but even these models can lose value on any given day. If a client wants guaranteed products we generally refer them to a financial institution that offers those types of accounts. Specific risks that could affect the value of accounts include but are not limited to: business risk - The risk of the business invested in performing poorly; currency risk - the risk of fluctuating exchange rates.; inflation risk - the risk of loss of purchasing power due to the increase in costs over time due to rising prices.; interest rate risk - the risk of rising interest rates for an income producing investment; liquidity risk - the risk associated with trying to close out a position; market risk (systemic risk) - the risks associated with the overall market; and regulatory risk - the risk of a change in laws and regulation on the investment.

#### Disciplinary Information

Neither the Company nor any of its principals or employees have any disciplinary history to report.

#### Other Financial Industry Activities and Affiliations

Suzanne T. Mestayer is a CPA - inactive. Marcel J. Dupre is licensed as an attorney but does not practice law. Mr. Dupre also maintains a Louisiana insurance license and occasionally assists a client with a term life policy or disability policy, but this represents less than 2% of his time and accounts for very minimal income. Fritz Gomila is a member of GF Group, LLC, a holding company with investments in real estate and a private equity fund but he receives no compensation other than growth of value in investment.

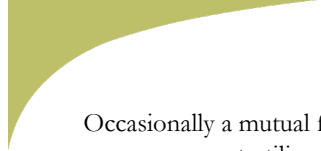
In addition to being registered as an investment adviser, our firm is also licensed as an insurance agency. Therefore, persons providing investment advice on behalf of our firm are licensed as insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. Please see the Fees and Compensation section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm.

The Company's Code of Ethics is written to assist with maintaining an atmosphere of disclosure to avoid any potential conflicts of interests with clients and compliance with applicable securities laws. The Company reviews personal securities transactions of all staff members and prohibits many transactions that could potentially create an appearance of a conflict of interest with clients. With the exception of legacy investments, staff members have all of their investment assets in a model portfolio run by the Company including brokerage accounts, annuities, 401(k) accounts all in the same model portfolios as our clients, and the Company encourages any new hires to open accounts with the Company. We are aligned with our clients.

### Brokerage Practices

As mentioned above in "Account Minimums and Custodians", we work with several different custodians depending on the type of account the client needs or has. Since we only use mutual funds or similar type investments to run our models for clients, there is no "better" pricing as far as the underlying investments because they all trade at a price determined after the markets are closed. Part of the formula for choosing custodians for clients includes an analysis of the list of no transaction fee ("NTF") funds available. Some custodians carry more NTF funds than others but may not have the best overall mixture of technology, customer service, costs, etc. to go into a good overall package for clients and the Company. Custodians vary in the minimum amount of assets under management they require from registered investment advisors such as the Company and therefore it is not feasible in many cases to open accounts for clients at multiple custodians. Costs increase for the Company and efficiency drops as more custodians are added. The Company may have a conflict of interest with a client in that some clients may benefit from having one particular custodian over another for certain reasons such as the list of NTF funds is larger at one or there is no annual fee for retirement accounts at another, etc. We must make a decision that is best for all clients on custodial relationships instead of on an account by account basis.

Advisor participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC/NFA. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program.



Occasionally a mutual fund company, custodian, or other vendor which the Company may or may not utilize may provide indirect compensation in the form of complimentary research, hotel rooms for conferences, donations for art shows the Company sponsors or other minor assistance. The total amount of any and all indirect compensation represents a minimal percentage of revenue and does not influence the Company when making decisions of where to invest client assets. If indirect compensation could appear to be influential in any decisions made on investments, such compensation would be refused by the Company. We strictly work in the best interests of our clients.

#### Review of Accounts

Client accounts are reviewed on a day-to-day basis for contributions, distributions and other issues which may impact the relationship of the account to its specified model. Jessica Poret conducts most of the daily reviews on accounts.

Models are reviewed daily for performance and adjustments to models are made as frequently as quarterly and at least annually. The investment vehicles inside the models are reviewed daily for changes in management other such issues which would put the fund on a watch list. Marcel Dupre conducts most of the daily reviews on models.

Clients should notify the Company promptly of any changes to the client's financial goals, objectives or financial situation as such changes may require a review of the portfolio and make recommendations for changes.

Clients receive detailed monthly or quarterly statements of account activity, holdings and values, as well as confirmations of purchases and sales from qualified, independent custodians.

## Client Referrals and Other Compensation

The Company has entered into written arrangements to pay a percentage of the Company's advisory fee as referral fees to individuals or companies ("solicitors") who recommend clients to the Company. There is a written agreement between the Company and each solicitor which clearly defines the duties and responsibilities of the solicitor under this arrangement. In addition, each solicitor is required to provide a written disclosure document, which explains to the prospective client the terms under which the solicitor is working with the Company and the fact that the solicitor is being compensated for the referral activities. The solicitor is also required to furnish a copy of the Company's written disclosure document (this document) to the prospective client and obtain a written acknowledgement from the client that both the solicitor's and Company's disclosure documents have been received. Fees charged to clients that are the product of a referral from a solicitor are the same as those not referred from a solicitor.

Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade.



## Client Referrals and Other Compensation (Continued)

Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

### Custody

The Company does not retain custody of any client assets. The main custodians we utilize for clients are discussed in "Account Minimums and Custodians" section above. As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian (s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

### Investment Discretion

The Company receives written discretion authority from most new clients when accounts are opened with the exception of 401(k) plan participants and a few other accounts at "other" custodians than ones names above. Discretion is limited to trading accounts in accordance with our model portfolios and does not allow for any distributions, transfers, or other non-trading actions in accounts. The ability of the Company to make trades in accounts without obtaining prior consent from clients is critical in the effective and efficient management of model portfolios for clients. Since the Company is not compensated for trading securities in client accounts, there is no incentive to trade other than to do what is best for the client.



## Voting Client Securities

The Company neither votes proxies for clients, nor provides advice to clients about how to vote proxies. The custodians send proxies directly to clients for voting and the Company does not take instructions from clients for voting.

## Financial Information

The Company does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$500 in fees six or more months in advance nor have we filed a bankruptcy petition at any time in the past ten years. Therefore, we are not required to include a financial statement with this brochure.

## Additional Information

### Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you may or may not keep the profit depending upon the custodian.

### Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

## Privacy Policy

The Company is committed to maintaining the confidentiality, integrity and security of personal information about our current and prospective clients. We consider customer privacy to be fundamental to our relationship with clients. It is therefore our policy to respect the privacy of current and former clients and to protect personal information entrusted to us. This policy describes the steps we have taken to safeguard your information and what client information we may share with others. We are proud of our privacy practices and want you to know how we protect information used to provide you with service. You do not have to contact us to benefit from our privacy protections; they apply automatically to all of our clients.

### Information We Collect and Maintain:

We collect and discriminately share with others the following types of personal information about you:

- Information we receive from you to open an account or provide investment advice to you (such as your home address, telephone number, Social Security or taxpayer identification number, e-mail address, age, marital status, assets, and income financial information);
- Information that we generate to service your account (such as trade tickets and account statements); or
- Information that we may receive from third parties with respect to your account (such as trade confirmations).

### Information We Disclose

We will not disclose any Non-public Personal Information about you or your account(s) to anyone unless one of the following conditions is met:

- Firm receives your prior written consent;
- Firm believes the recipient is your authorized representative;
- Firm discloses your Non-public Personal Information as necessary to effect or process a transaction in any account, or to maintain or service your account(s);
- Firm is required by law to disclose information to the recipient.

In all such situations, we stress the confidential nature of information being shared.

We may share your personal information with:

- Non-affiliated companies that provide processing, account maintenance and related services in connection with your investments and other transactions handled by us; and
- Non-affiliated companies and government agencies only to the extent permitted or required by law, for legal, regulatory or other purposes (for example, for tax purposes or for reporting suspicious transactions).



## Privacy Policy (continued)

### How We Protect Personal Information

We maintain the confidentiality, security and integrity of your non-public personal information by:

- Restricting access to your Non-public Personal Information to those employees with a legitimate need for the information; and
- Maintaining physical electronic and procedural safeguards that meet or exceed federal and industry standards governing how Non-public Personal Information should be stored.

We have not and will not sell your personal information anyone, even if our formal client relationship ends.

### Privacy Policy Update

From time to time, we may amend our privacy policy. You will receive appropriate notice when our privacy policy changes. The Company will send its Clients a current privacy policy at least once a year.



## Privacy Policy (continued)

### How to Contact us with Privacy Questions

Our relationship with you is one of our most vital assets. We recognize that you have entrusted us with your private financial information, and we will do our utmost to maintain this trust. For additional questions concerning our privacy policy, please contact Marcel Dupré at 225.757.8007.

The policies and practices listed above apply to both current and former clients.



## ADV PART 2B

### CONTACT INFORMATION:

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## **Educational Background and Business Experience**

From 2000-2008, Suzanne T. Mestayer was the New Orleans President of Regions Bank (and formerly AmSouth Bank) where her responsibilities included leadership of four city markets. She is the founder and Managing Member of Advisean Partners, LLC, a holding company that was founded in 2008. Mrs. Mestayer earned her Bachelor of Science in Accounting from Louisiana State University. She is also a CPA-Inactive. Mrs. Mestayer's many years of accounting and banking experience are a tremendous value to ThirtyNorth Investments, LLC and our clients. She was born in 1952.

Since 1997, Marcel J. Dupré has been actively engaged in running what is now ThirtyNorth Investments, LLC. He has managed all areas of the business including research, trading, compliance, marketing, and information technology. Mr. Dupré earned his Bachelor of Science in Economics from University of Southern Mississippi, as well as his Masters in Business Administration and Juris Doctor from Loyola University. He was born in 1967.

Before joining the company, Fritz Gomila, Jr. was the Chief Executive Office/ President of Worner Hardware, Inc. In this position he managed all aspects of business on a daily basis including sales, marketing, financial, inventory and personnel. Mr. Gomila worked as a Consultant with GF Group, LLC from 2002-2004 providing consulting services to clients in real estate, property management, private equity and theater development industries. This included evaluating real estate opportunities on a market and cash flow basis assisting with tax-free exchange real estate investment projects. Also Mr. Gomila was an Associate with Johnson Rice & Co., LLC from 1999-2002 in the Corporate Finance Department. He assisted companies with initial public offerings, follow-on public offerings, private placements and business valuations and evaluated merger and acquisition opportunities. Mr. Gomila earned his Bachelor of Science in Commerce, with a concentration in Finance, from the University of Virginia, followed by his Master of Business Administration, with a concentration Finance, from Tulane University. He was born in 1969.

Before joining the company, Jessica Poret was a Staff Accountant with Latuso & Johnson, CPA, where her responsibilities included tax preparation, bookkeeping and payroll services. Since 2007 Ms. Poret has been a trader/research assistant and has been responsible for accounting and client account management with what is now ThirtyNorth Investments, LLC. Ms. Poret earned her Bachelor of Science in Finance from Southeastern Louisiana University. She was born in 1987.



## **Disciplinary Information**

Neither the company nor any of its principles or employees have any disciplinary history to report.

## **Other Business Activity**

Suzanne T. Mestayer is a board member of McMoRan Exploration Co., an independent publicly traded corporation engaged in the exploration, development and production of oil and natural gas. This position does not represent any conflicts of interest for clients because ThirtyNorth Investments, LLC doesn't trade McMoran stock for clients. Jessica Poret performs bookkeeping services on a part-time basis not during regular firm business hours. Her bookkeeping work does not present a conflict of interest for clients.

## **Additional Compensation**

Fritz Gomila, Jr. is compensated by salary plus an incentive to develop more business for the business in terms of new accounts/assets. Although, on the surface, the potential for a conflict of interest exists due to the incentive pay, both Mr. Gomila and ThirtyNorth Investments, LLC would not accept new business from a client if our services were not a good fit for the client.

## **Supervision**

The company supervises the work of Jessica Poret, Fritz Gomila, and Marcel Dupré, including monitoring investment advice that is given. Much of the work is supervised as it occurs because of the teamwork the company employs. Often an individual and his or her supervisor work together on client matters. When someone does individual work, the supervisor will typically discuss the needs of the client beforehand. The supervisor then reviews the work and/or meets the client. Supervisors also have access to employees' electronic communications and will access these records as needed.

Jessica Poret's supervisor is:

Marcel J. Dupré, Chief Investment Officer  
Direct Phone: 225-214-4421

Fritz Gomila's supervisor is:

Suzanne T. Mestayer, Chief Executive Officer  
Direct Phone: 504-528-3688

Marcel J. Dupre's supervisor is:

Suzanne T. Mestayer, Chief Executive Officer  
Direct Phone: 504-528-3688