

**JENEVA INVESTMENT ADVISORS, INC.**  
**FORM ADV PART 2A**

**INVESTMENT ADVISOR BROCHURE**

**March 15, 2011**

This brochure provides information about the qualifications and business practices of Geneva Investment Advisors, Inc. (JIA). If you have any questions about the content of this brochure, please contact us at (800) 643-5936 and/or [customerservice@jenevainvadv.com](mailto:customerservice@jenevainvadv.com).

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

Additional information about Geneva Investment Advisors, Inc. is also available on the SEC's website.

Office of JIA:  
3455 Peachtree RD NE  
Suite 500 5<sup>th</sup> FL  
Atlanta, GA 30326  
(800) 642-5936  
(404) 537-1692

e: [customerservice@jenevainvadv.com](mailto:customerservice@jenevainvadv.com)

[www.jenevainvadv.com](http://www.jenevainvadv.com)

## Item 2: Summary of Material Changes

### Annual Update:

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

### Material Changes since the Last Update:

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm's Brochure in narrative "plain English" format. The new final rule specifies mandatory sections and organization.

### Full Brochure Available:

Whenever you would like to receive a copy of our Brochure, please contact us at [customerservice@jenevainvadv.com](mailto:customerservice@jenevainvadv.com)

### Item 3: Table of Contents

Item 2: Summary of Material Changes	2
Annual Update	2
Material Changes Since Last Update	2
Full Brochure Availability	2

### Item 4: Advisory Business

Firms Description	8
Principle Owner	8
Types of Advisory Services	8
DPM – Discretionary Portfolio Management	8
NDPM – Non – Discretionary Portfolio Management	9
General Investment Advice	9
Tailored Relationships, Wrap Fee Program and Client Assets	10

### Item 5: Fees and Compensation

Compensation	11-12
Calculation and Payment	12
Other Fees	12
Agreement Terms and Additional Compensation	13

<u>Item 6: Performance Based Fees and Side by Side Management</u>	13
 <u>Item 7: Types of Clients and Account Minimums</u>	13
Types of Clients	13
Account Minimums	13
 <u>Item 8: Method of Analysis, Investment Strategies and Risk Loss</u>	14
Method of Analysis and Investment Strategies	15
Risk of Loss	16-17
 <u>Item 9: Disciplinary Information</u>	17
 <u>Item 10: Other Financial Activities and Affiliations</u>	17
Affiliations	17
 <u>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</u>	18
Code of Ethics	18
Participation or Interest in Client Transactions	18-19
Participation or Interest in Client Transactions Personal Securities Trading	19

<u>Item 12: Brokerage Practices</u>	20
Research and Other Soft Dollar Benefits	20
Brokerage for Clients Referrals	20
Direct Brokerage	20- 21
Client Direct Brokerage	21
Trade Aggregation	21
 <u>Item 13: Review of Accounts</u>	 21
Reviews	21
Review Triggers	21
Reporting	22
 <u>Item 14: Client Referrals and Other Compensation</u>	 22
Compensation Client Referrals	22
 <u>Item 15: Custody</u>	 23
Custody Fee Debiting	23
Custody Account Statements	23
 <u>Item 16: Investment Discretion</u>	 23
Discretionary Authority for Trading and Limited Power of Attorney	24

<u>Item 17: Voting Client Securities</u>	24
<u>Item 18: Financial Information</u>	24
Other Information	25
Privacy	25
Business Continuity Provision	26
 <u>Item 19: Requirements for State Registered Advisors</u>	 27
Form ADV PART 2B	
Investment Adviser Brochure Supplement	28
Education Background and Business Experience	29
Education and Business Background	29
Professional Certifications	29
Supervised Persons	29
Disciplinary Information	29
Other Business Activities	30
Additional Compensation	30
Supervision	30
Requirements for State Registered Advisors	30

THIS PAGE  
LEFT  
BLANK  
INTENTIONALLY

## Item 4: Advisory Business

### Firm's Description:

Jeneva Investment Advisors, Inc. is a SEC Registered Investment Advisory Firm providing advice to individuals, pensions, profit sharing plans, endowments, charities, corporations and other business entities.

### Principal Owner:

Kenneth Underwood owns 100% of JIA. Mr. Underwood is President/CEO

### Types of Advisory Services:

JIA offers the following types of services to its clients:

- (a) Discretionary Portfolio Management
- (b) Non-Discretionary Portfolio Management
- (c) General Investment Advice

### Discretionary Portfolio Management:

Clients who hire JIA for Discretionary Portfolio Management allow JIA to have full discretion to make buy and sell decisions on their behalf based on specific objectives or strategies established between JIA and the client. Accounts are separately managed, and clients retain individual ownership of all securities.

JIA provides continuous advice to clients regarding investment of client funds based on the individual needs of the client. Through personal discussions, in which goals and objectives based on a client's particular circumstances are established, JIA develops a client's personal investment strategy and creates and manages a portfolio based on that strategy.

JIA creates a portfolio consisting of one or all of the following: individual equities, bonds, exchange-traded funds (ETFs), closed-end funds, and no-load mutual funds. Clients have the opportunity to place reasonable restrictions on the types of investments which are made on the client's behalf. JIA offers the following proprietary strategies: Dividend Stocks; Fixed-Income; and Global ETFs. Discretionary Portfolio Management clients may utilize one or more of these strategies.



## Non-Discretionary Portfolio Management:

Clients who hire JIA for Non-Discretionary Portfolio Management allow JIA to make buy and sell transactions subsequent to direct dialog with JIA for each transaction. Non-Discretionary Portfolio Management portfolios are based on specific objectives or strategies established between JIA and the client. Accounts are separately managed, and clients retain individual ownership of all securities.

JIA provides continuous advice to clients regarding investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, JIA advises clients on the construction and implementation of a personal investment strategy.

JIA advises the construction of portfolios, which consist of one or all of the following: individual equities, bonds, exchange-traded funds (ETFs), closed-end funds, and no-load mutual funds. Clients have the opportunity to place reasonable restrictions on the types of investments. JIA employs a customized investment approach for Non-Discretionary Portfolio Management clients, which is not based on a proprietary strategy.

When appropriate to the needs of the client, JIA may recommend the use of margin transactions or option writing. Since these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated tolerance for risk.

## General Investment Advice:

JIA offers General Investment Advice services for clients who desire advice for investment needs that are not deemed as Discretionary Portfolio Management or Non-Discretionary Portfolio Management. General investment advice services are generally offered on an hourly basis, and may include advice on portfolio construction, asset allocation, income-planning, portfolio review/analysis, analysis/management of specific securities, or other circumstances.

#### Tailored Relationships:

JIA tailors investment services to the individual needs of the client. JIA clients are allowed to impose restrictions on the investments in their account. JIA may accept any reasonable limitation or restriction on the account placed by the client. All limitations and restrictions placed on accounts must be presented to JIA in writing.

#### Wrap Fee Programs:

JIA participates in a Wrap Fee Program. This program relies on JIA maintaining an account at a third party custodian, and trades executed in that account are offered as a model for investors. JIA receives a portion of the total wrap fee for its portfolio management services. This program is Referenced in ADV Schedule D.

#### Client Assets Under Management (AUM):

As of 03/15/2011, JIA manages approximately \$ 23,673,416 in assets. All of which is managed on a Non-Discretionary Portfolio Management basis.

## Item 5: Fees and Compensation

JIA bases its fees on a percentage of assets under management or based on an hourly rate.

Fees for Discretionary Portfolio Management services are billed as a percentage of assets under management according to the schedule below:

Assets under Management	Annual Fee
\$200,000 to 500,000	(2.00%)
\$501,000 to 1,500,000	(1.55%)
\$1,501,000 to 5,000,000	(1.15%)
Above \$5 Million	(0.80%)

Fees for Non-Discretionary Portfolio Management services are billed as a percentage of assets under management according to the schedule below:

Assets under Management	Annual Fee
\$100,000 to 500,000	(.80%)
\$501,000 to 1,500,000	(.55%)
\$1,501,000 to 5,000,000	(.35%)
Above \$5 Million	(0.23%)

Fees for General Investment Advice services are based on a rate of \$100 per hour with a 3 hour minimum.

In certain circumstances, fees, account minimums and payment terms are negotiable depending on a client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation. Lower fees for comparable services may be available from other sources.

## Calculation and Payment:

The specific manner in which fees are charged by JIA is established in a client's written agreement with JIA.

Discretionary Portfolio Management and Non-Discretionary Portfolio Management fees are due and payable quarterly in advance. The initial fee is calculated based upon the fair market value when the portfolio is established, and prorated to the end of the current quarter. Thereafter, the fee is calculated based upon the fair market value of the portfolio as of the last business day of the previous quarter. The advisory fees generally do not include commissions and trading costs.

Clients may elect to be invoiced directly for fees or to authorize JIA to directly debit fees from client accounts. Fees shall not be prorated or adjusted for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee.

Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Billing for General Investment Advice is due and payable at 50% upon engagement of services and the balance is due upon completion of service.

## Other Fees:

JIA's fees do not include brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to JIA's fee, and JIA shall not receive any portion of these commissions, fees, and costs.

#### Agreement Terms:

A client may terminate the client agreement at any time by notifying JIA in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination.

Additionally, JIA may terminate the client agreement at any time by notifying the client in writing.

#### Additional Compensation:

Neither JIA nor any of its supervised persons (employees) accept compensation for the sale of securities or other investment products.

#### Item 6: Performance-Based Fees and Side-by-Side Management:

Neither JIA nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of, the assets of a client).

JIA does not use a performance-based fee structure. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

#### Item 7: Types of Clients

As described in Item 4, JIA's clients include individuals, pension and profit sharing plans, trusts, estates and charitable organizations, corporations or other businesses.

#### Account Minimums:

JIA requires a minimum account of \$200,000 for Discretionary Portfolio Management and \$100,000 Non-Discretionary Portfolio Management services, although this may be negotiable under certain circumstances. JIA may group certain related client accounts for the purposes of achieving the minimum account size.

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

### Methods of Analysis:

JIA employs the following analytic methods: economic; fundamental; historical; credit; interest rate; market; asset class; industry/sector; and valuation analysis.

JIA uses the following main sources of information including, financials newspapers and magazines, internet research, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission (SEC), and company press releases. Other sources of information that JIA may use include information from investment managers, financial service companies, data base companies, financial journals, government sources, and broker dealer's research data.

JIA utilizes a fundamental and valuation approach in security analysis. It utilizes data bases from several sources as input to its own computer models and those from other companies. This quantitative processing produces an output that ranks companies, funds, and securities. Thereafter, the Firm's own analysts perform fundamental analyses prior to purchasing the securities for client portfolios.

JIA may use any of the following investment approaches to implement investment advice. Long-term purchases (securities held at least a year); Short-term purchases (securities sold within a year); Trading (securities sold within 30 days); Margin transactions; Option writing, including covered options, uncovered options or spreading strategies.

The results for individual portfolios will vary depending on market conditions and the portfolio's overall composition. All investments carry a certain degree of risk including the possible loss of principal and there is no assurance that an investment will provide positive performance over any period of time. Past performance is no guarantee of future results. Clients should not assume that portfolio investments in securities will be profitable.

## Investment Strategies

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an investment strategy based on their objectives, risk tolerance, and their desired investment strategy.

Certain clients retain JIA to employ one or more of the firm's three proprietary strategies: Dividend Stocks, Global ETFs, or Fixed-Income.

### Dividend Stocks:

The Dividend Stocks strategy focuses primarily on stocks with positive dividend yields. The strategy employs fundamental and valuation analysis for buy and sell decisions. The strategy is diversified across stocks in various industries and market capitalizations, and will occasionally hold cash. There are typically 20 or more securities in the strategy. Since the strategy focuses on common stocks, there is risk of loss in principal that tends to be comparable to that of the broad stock market.

### Global ETFs:

The Global ETFs strategy invests in a variety of exchange-traded funds (ETFs), which tend to be based on equities of various global stock markets. The strategy primarily focuses on ETFs and typically holds 20 or more securities. This strategy employs fundamental and valuation analysis for buy and sell decisions. Since the strategy focuses on ETFs that are comprised of common stock, there is risk of loss in principal that tends to be comparable to that of the global stock market.

### Fixed-Income:

The Fixed-Income strategy invests in a variety of closed-end funds and mutual funds, both of which are typically comprised of traditional bonds and other income-generating securities. Analysis focuses on valuation and risks related to income stability, interest-rates, and credit quality. The strategy employs fundamental and valuation analysis for buy and sell decisions. Since the strategy focuses on income-generating funds, there is risk of loss in income and principal that tends to be comparable to that of the broad global bond market.

---

**Risk of Loss:**

Investing in securities involves risk of loss that clients should be prepared to bear.

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

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while Real Estate is not.



- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

JIA reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. JIA may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

JIA provides advice on asset allocation. JIA may, at times, recommend other investment advisors for ongoing management.

#### Item 9: Disciplinary Information:

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of JIA and the integrity of JIA's management. JIA and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

#### Item 10: Other Financial Industry Activities and Affiliations:

##### Affiliations:

Neither JIA nor any of its management persons have a material relationship or arrangement with any other related person or financial industry entities.

JIA does, at times, recommend or select other investment advisors for its clients.

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

### Code of Ethics:

JIA employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Ken Underwood, President/CEO, reviews all employee activities monthly. These reviews ensure that personal trading does not affect the markets, and that clients of JIA receive preferential treatment.

JIA employees must acknowledge the terms of the Code of Ethics at least semi-annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of Code of Ethics by contacting customer service at (800)-643-5936.

### Participation or Interest in Client Transactions:

Neither JIA nor its employees recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

### Participation or Interest in Client Transactions – Personal Securities Transactions:

JIA and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of JIA will not interfere with (a) making decisions in the best interest of advisory clients and (b) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of JIA clients.

In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and designed to reasonably prevent conflicts of interest between JIA and its clients.

## Item 12: Brokerage Practices

### Research and Other Soft Dollar Benefits:

JIA has no written or verbal arrangements whereby it receives soft dollars.

### Brokerage for Client Referrals:

JIA does not receive client referrals from Broker/Dealers.

### Directed Brokerage:

JIA shall generally recommend that portfolio management clients establish brokerage accounts with Trade PMR, a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts.

Trade PMR provides JIA with access to its institutional trading and custody services, which are typically not available to Trade PMR retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$2 million of the advisor's clients' assets are maintained in accounts at Trade PMR. Trade PMR brokerage services include the execution of securities transactions, 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.

For JIA client accounts maintained in its custody, Trade PMR generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Trade PMR or that settle into Trade PMR accounts.

Trade PMR products and services that assist JIA in managing and administering clients' accounts include software and other technology that (a) provide access to client account data (such as trade confirmations and account statements); (b) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (c) provide research, pricing and other market data; (d) facilitate payment of JIA Client Directed Brokerage.

#### Client Direct Brokerage:

While not routine, the client may direct JIA to use a particular broker-dealer to execute some or all transactions for the client. This brokerage direction must be requested by the client in writing. In that case, the client will negotiate terms and arrangements for the account with that Broker-Dealer, and JIA will not seek better execution services or prices from other Broker-Dealers or be able to "batch" client transactions for execution through other Broker-Dealers with orders for other accounts managed by JIA. By directing brokerage, the 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. Not all advisers require or allow their clients to direct brokerage. Subject to its duty of best execution, JIA may decline a client's request to direct brokerage if, in JIA sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

#### Trade Aggregation:

JIA does not aggregate or block trades.

#### Item 13: Review of Accounts:

Ken Underwood, President/CEO, reviews the overall firm investment philosophy to ensure it is consistently applied to client accounts regardless of the client account manager.

Each portfolio manager has the responsibility to manage the portfolio in accordance with the clients' investment objectives and constraints. This management process includes on-going oversight of the portfolio's investments, buying and selling securities, and communication with clients. All security purchases and sales are reviewed daily by Ken Underwood.

#### Review Triggers:

Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation.

## Reporting:

Each month, the custodian provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits and withdrawals, accrued income, and dividends. In addition, the custodian provides clients with trade confirmations for each position bought and sold.

JIA also provides clients with a quarterly report including an account appraisal that identifies the current positions as of the reporting date, amount owned current value, and percentage weighting within the portfolio of each security. A performance summary is also provided for the portfolio.

## Item 14: Client Referrals and Other Compensation

### Other Compensation:

JIA does not receive any economic benefits (other than normal compensation) from any third-party firm or individual for providing investment advice.

### Compensation – Client Referrals:

JIA does not make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## Item 15: Custody

### Custody – Fee Debiting:

JIA has one form of custody in that clients may authorize JIA (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). Client investment assets will be held with a custodian agreed upon by the client and JIA. The custodian is advised in writing of the limitation of JIA access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to JIA.

While JIA will assist clients in establishing and maintaining accounts at the custodian, JIA shall have no responsibility or liability with respect to custodial arrangements or the acts, omissions or other conduct of the custodian.

### Custody – Account Statements

As described above and in Item 13, clients receive at least quarterly statements from the Broker Dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that JIA provides. JIA statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities

## Item 16: Investment Discretion

### Discretionary Authority for Trading and Limited Power of Attorney

Through the Investment Advisor Agreement, JIA may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows JIA to execute trades on behalf of clients.

When such limited powers exist between the JIA and the client, JIA has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, JIA may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to JIA in writing. However, JIA consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

#### Item 17: Voting Client Securities

JIA does not have any authority to and does not vote proxies on behalf of clients. JIA also does not render advice to or take any actions on behalf of clients with respect to any legal proceedings, including bankruptcies and shareholder litigation. Clients retain the responsibility for receiving and voting proxies and any legal proceedings for securities maintained in their portfolios; clients receive these corporate actions from directly from either custodians or transfer agents.

If requested, JIA may provide advice to clients regarding proxy votes and legal proceedings. If any conflict of interest exists, it will be disclosed to the client.

#### Item 18: Financial Information

JIA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

As a Registered Investment Advisor regulated by the Securities & Exchange Commission JIA does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client, and six months or more in advance.



## Other Information

### Privacy:

JIA is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

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

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

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

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

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

## Business Continuity Plan:

JIA has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people. The Business Continuity Plan covers natural and man-made disasters. Electronic files are backed up daily and stored offsite.

Alternate offices are identified to support ongoing operations in the event the main office is unavailable.

JIA intention is to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

## Item 19: Requirements for State Registered Advisors

### Management Background:

See response to Form ADV Part 2B - Investment Adviser Brochure Supplement.

### Other Business:

See response to Item 10 - Other Financial Industry Activities and Affiliations.

### Performance-Based Fees:

Neither JIA nor any supervised persons are compensated by performance-based fees.

### Disciplinary Disclosures:

Neither JIA nor any management persons have been involved in any activities resulting in a disciplinary disclosure.

### Issuer of Securities:

Neither JIA nor any management persons have any relationships or arrangements with any issuer of securities.

Form ADV Part 2B – Investment Adviser Brochure Supplement

Jeneva Investment Advisors, Inc.

Form ADV Part 2B

Investment Adviser Brochure Supplement

Ken Underwood

Supervisor of:  
Ken Underwood

This brochure supplement provides information about the Firm's Supervised Persons that supplements The JIA brochure. You should have received a copy of that brochure. Please contact customer service if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website.

3455 Peachtree RD NE  
Atlanta, GA 30326  
(800) 643-5936  
(404) 537-1692

[customerservice@jenevainvadv.com](mailto:customerservice@jenevainvadv.com)

[www.jenevainvadv.com](http://www.jenevainvadv.com)

## Educational Background and Business Experience

### Education and Business Background:

JIA requires that advisers in its employment have acceptable coursework which may include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisers must have 5 years work experience that demonstrates their aptitude for investment management.

### Professional Certifications:

### Supervised Persons:

Ken Underwood  
Born 1956

### Business Background:

\*Jeneva Investment Advisors, Inc. 2002 - Present  
SEC Registered Investment Adviser  
President/CEO

PinPoint Mortgage Corporation 1999 - 2002  
Co-Managing Partner

Solomon, Hendrix & Wood P.C. 1993 - 1999  
President/CEO

\*Jeneva Investment & Tax Advisors, Inc. 1982 - 1993  
SEC Registered Investment Adviser Originally Approved 1982  
President/CEO

Education:  
Finance Major  
University of California at Long Beach 1981 - 1982  
Long Beach City College 1979-1981

\*Indicates same business ownership with name changed.

Neither JIA nor any Supervised Persons have been involved in any activities resulting in a disciplinary action.

Other Business Activities:

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations above.

Additional Compensation:

No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

Supervision:

Ken Underwood, President/CEO, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Ken Underwood supervises these persons by holding regular staff, investment and other ad hoc meetings.

In addition, Ken Underwood regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Contact Ken Underwood at [ken@jenevainvadv.com](mailto:ken@jenevainvadv.com)

Requirements for State Registered Advisers

Neither JIA nor any management persons have been involved in any activities resulting in a disciplinary disclosure.