

This brochure supplement provides information about Randy Scott Palomba that supplements the PT Asset Management, LLC brochure. You should have received a copy of that brochure. Please contact Randy Scott Palomba, Co-President if you did not receive PT Asset Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Randy Scott Palomba is also available on the SEC's website at www.adviserinfo.sec.gov.

PT ASSET MANAGEMENT, LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

Randy Scott Palomba
Personal CRD Number: 703954
Investment Adviser Representative

PT Asset Management, LLC
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Denver, Colorado 80202
(303) 244-0467
randy.palomba@ptassetmanagment.com

UPDATED:3/29/2012

Item 2: Educational Background and Business Experience

Name: Randy Scott Palomba

Born: 1957

Education Background and Professional Designations:

Education:

BA Accounting, Western State College - 1979

Designations:

CFA – Chartered Financial Analyst

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders-often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Business Background:

03/2012 – Present	Co-President PT Asset Management, LLC
09/2011 – Present	Co-President Public Trust Advisors, LLC
1/1998 - 7/2011	Portfolio Manager MBIA/Colorado Investor Services Corp

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Randy Scott Palomba is not engaged in any investment-related business or occupation (other than this advisory firm).

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Randy Scott Palomba does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through PT Asset Management, LLC.

Item 6: Supervision

As a co-president and representative of PT Asset Management, LLC, Randy Scott Palomba supervises all duties and activities of the firm. Randy Scott Palomba's contact information is on

the cover page of this disclosure document. Randy Scott Palomba adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.