

Wyoming Investment Management Services

**1623 Central Avenue – Suite #142
Cheyenne, WY 82001**

307-432-4011

December 27, 2012

This Brochure provides information about the qualifications and business practices of Wyoming Investment Management Services, “WIMS”. If you have any questions about the contents of this Brochure, please contact us at 307-432-4011. 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.

Wyoming Investment Management Services is a registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Additional information about Wyoming Investment Management Services also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that WIMS provides to clients as required by SEC Rules. This Brochure dated December 27, 2012 is a new document prepared according to the SEC’s new requirements and rules.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. WIMS will also reference the date of its last annual update of its brochure.

WIMS will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, this Brochure may be requested by contacting Craig Scariot, Manager, at 307-432-4011.

Additional information about Wyoming Investment Management Services is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with WIMS who are registered, or are required to be registered, as investment Advisor representatives of WIMS.

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Item 4 – Advisory Business

Wyoming Investment Management Services, LLC or (WIMS or “Advisor”) is registered as an investment advisory firm under the United States Securities and Exchange Commission (“SEC”).

Wyoming Investment Management Services is wholly-owned by White Squirrel Group, LLC. The principle owner of Wyoming Investment Management Services is White Squirrel Group, LLC.

Discretionary Investment Supervisory Services

Wyoming Investment Management Services provides Investment Supervisory Services which involve ongoing and continuous portfolio management services. These services include providing investment advice and/or making investments for clients based on the individual needs of the client.

Investment decisions and ongoing account supervision are guided by the client’s stated individual needs, goals, objectives, time horizons, risk tolerance and suitability established via a data-gathering and discussion process. The Advisor assumes the information disclosed by clients in this data-gathering and discussion process is complete and accurate. If the client chooses to withhold information, the client must understand that comprehensive investment needs/objectives may not be fully considered.

Wyoming Investment Management Services believes that client participation in the investment process is critical. *Clients are advised to promptly notify Wyoming Investment Management Services if there are any changes in their financial situation or investment objectives, or if they wish to impose any reasonable restriction upon the Advisor’s management services.*

If an Investment Management Agreement includes related clients (e.g. husband and wife, life partners, etc.), its services will be based upon the joint goals communicated to us by either party. WIMS is permitted to rely upon instructions from either party with respect to disposition of the assets, unless and until such reliance is revoked in writing to us. WIMS is not responsible for any claims or damages resulting from such reliance or from any change in the status of the relationship between the clients.

Clients or Wyoming Investment Management Services may terminate the Investment Supervisory services, immediately upon receipt of a 30-day written notice.

Non-Discretionary Investment Supervisory Services

For those clients that require an enhanced and/or specialized level of asset management services, Wyoming Investment Management Services may recommend that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain other independent investment manager[s] and/or programs (the “*Independent Manager[s]*”), based upon the stated investment objectives of the client. The terms and conditions under which a client engages the *Independent Manager[s]* will generally be set forth in a separate written agreement between the client, Wyoming Investment Management Services, and the designated *Independent Manager[s]*.

Wyoming Investment Management Services will render non-discretionary investment advisory services to clients relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives, for which WIMS will receive an annual advisory fee based upon a percentage of the market value of the assets being managed by the designated *Independent Manager[s]*. Factors which WIMS considers in recommending *Independent Manager[s]* include a client's stated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research.

Financial Consultation Services

Wyoming Investment Management Services is available to provide Financial Consultation Services on an hourly, project or annual basis. Prior to engaging the Advisor to provide financial consulting services, a client will generally (depending upon the level and/or scope of services to be provided) be required to enter into an Investment Supervisory Agreement setting forth the terms and conditions of the engagement, and describing the scope of the services to be provided.

Wyoming Investment Management Services does not consider itself a comprehensive financial planner, but can provide assistance in connection with various components of financial planning as part of these services, if desired. The Advisor may provide Financial Consultations pertaining to such issues as research, investment analysis, portfolio reviews, asset allocation, retirement planning, education funding, risk assessment, goal setting, business and business owner issues, cash flow, or other needs or areas of interest that are identified by the client. All services are tailored to the clients' needs and desires.

Wyoming Investment Management Services does not provide tax or legal advice. Clients requiring assistance on issues outside of financial and investment advisory topics should consult their personal tax advisor, legal counsel, or other professionals for expert opinions.

Item 5 – Fees and Compensation

Discretionary Investment Supervisory Services Fees

The fees for Investment Supervisory Services are based upon a percentage of the assets under management. The Advisor's normal fee scale is outlined below:

Assets Under Management

First \$1 million Account value	1.25% per annum
Next \$4 million Account value	1.00% per annum
Next \$5 million Account value	0.75% per annum
Account value over \$10,000,000	0.50% per annum

The Advisor's fee is agreed to at the time of engagement. Fees may be and often are modified at the Advisor's discretion, based on unusual circumstances, pre-existing relationships, or complex matters. The Advisor's fee may also be dependent upon the amount and nature of assets to be managed, required services, complexities, or other factors. Wyoming Investment Management Services reserves the right to provide pro bono services for some charitable organizations, family members, or for persons with special needs.

Clients will be invoiced after services are rendered, at the beginning of each calendar quarter, based upon the portfolio's market value as determined by the client's custodial firm on the last trading day of the preceding quarter. Accounts initiated or terminated during a calendar quarter

will be charged a prorated fee. Upon termination, any earned, unpaid fees will be due and payable immediately.

Payment of Investment Supervisory fees may be made directly by the client within 10 days of the invoice or payment of fees may be made through direct debit of the client's account by the qualified custodian holding the client's funds and securities.

The fees noted herein represent fees for advisory services only. Clients may pay transaction fees and brokerage commission to their broker/dealer as well as any fees associated with their particular accounts (e.g., account opening, maintenance, transfer, termination, cash wire transfer, retirement plan, trust fees, and any applicable third party fees). 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 the Advisor's fee, and the Advisor shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that the advisor considers in selecting or recommending broker/dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

Non-Discretionary Investment Supervisory Services Fees

The investment management fees charged by the designated outside *Independent Manager[s]*, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are generally exclusive of, and in addition to, WIMS's ongoing investment advisory fee. WIMS modifies its supervisory fee scale for monitoring of *Independent Manager[s]* to an average of 0.5% of assets held with the *Independent Manager[s]*.

Financial Consultation Fees

The Advisor's fees for Financial Consulting are charged on an hourly or fixed fee basis. Financial Consulting fees are determined at engagement, based on the nature and complexity of services, the client's particular circumstances or other factors, at the Advisor's discretion. Fees generally range from \$100.00 to \$400.00 on an hourly basis. The Advisor may request a retainer equal to ½ the estimated total project fee in order to schedule the project. In such cases, the balance of the project fee is due upon the conclusion of services. Should additional services be desired or where the client's circumstances have changed materially prior to the conclusion of services, additional fees may apply. However, the Advisor will obtain approval from the client prior to engaging in additional time and effort that will result in additional fees. If services are terminated before completion, any earned, unpaid fees will be due and payable immediately. Any pre-paid, unearned fees will be refunded promptly.

ERISA Accounts

WIMS is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, it is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, WIMS may only charge fees for investment advice about products for which the firm and/or its related persons do not receive any commission or 12b-1 fees.

Item 6 – Performance-Based Fees and Side-By-Side Management

Wyoming Investment Management Services does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Wyoming Investment Management Services provides portfolio management services to families, individuals, trusts, charitable organizations, corporate pension and profit-sharing plans, and small businesses.

Wyoming Investment Management Services requests a minimum relationship size of \$500,000 for clients interested in receiving Investment Supervisory Services. The Advisor reserves the right to waive the minimum conditions for pre-existing relationships, family members, where special circumstances exist, where the minimum can be reached within a reasonable time frame, or other considerations at the discretion of the Advisor. The Advisor reserves the right to decline to provide services to any person or firm for any reason. Independent Managers utilized by clients may have program minimums pursuant to their disclosure documents.

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

Wyoming Investment Management Services provides customized portfolio management services to meet the unique needs, situations and goals of clients. Each portfolio is individually designed and managed to meet the client's objectives. WIMS's typical portfolio combines growth and income investments to create a well-diversified allocation. WIMS takes an active approach to investing, adjusting strategy on a firm level, as well as, in individual portfolios as market conditions change. Investing in securities of any kind involves risk of loss that clients should be prepared to bear. WIMS discusses the risks of investing with each client and together they develop an investment strategy based upon the client's risk tolerances and objectives before any investing takes place. The investment strategy is reviewed and updated as needed based upon changes in the client's goals and/or risk tolerance.

The growth portion of client portfolios includes stocks from varied market segments. The positions represent both large and small companies and include most of the world's geographic regions. For the large cap, developed equity area, WIMS generally invests in individual company stocks. When researching individual stocks WIMS takes a bottom up approach, looking at the underlying financial status of the company and the prospects for the goods or services the company provides, while also taking into consideration economic factors. For less developed areas of the world or specialized sectors WIMS uses exchange traded or mutual funds. Funds allow portfolios to be invested in higher return, higher risk areas with more diversification than individual stock positions would carry because of the fund's larger number of holdings. When researching mutual funds, WIMS looks for low expense ratios, positive long term performance in relation to comparable funds, and stable manager tenure. With all equity positions, there is risk of loss.

The income portion of client portfolios is designed to produce cash flow through the use of bond ladders in combination with dividend paying stocks and high yield bond mutual funds. With all bonds there is risk of inflation and default. To mitigate the effect of inflation WIMS maintains a short average duration in its bond portfolios. To reduce the risk of default when buying individual bond issues, WIMS generally only buys investment grade bonds. For municipal bonds, WIMS

focuses on buying general obligation and essential service revenue bonds as they have more secured revenue sources for repayment of interest and principal. For corporate bonds WIMS looks for companies with a financial position that more than adequately covers their debt obligations and a positive outlook for continuing stable revenues.

For clients who can tolerate more risk in the income portion of their portfolio, WIMS invests in dividend paying stocks and mutual funds that invest in non-investment grade or international bonds. These options allow us to achieve greater cash flow than investing in investment grade bonds alone, but carry more risk. When researching dividend paying stocks, WIMS looks for financially stable companies with a strong product or service line, low price volatility and historical dividend growth. Dividend paying stocks may lose value due to price declines and dividends are not guaranteed. Investing in non-investment grade or international bonds carries a greater risk of default than investing in investment grade bonds, however by using mutual funds to invest in these areas the impact of a single issuer's default is greatly reduced. When researching mutual funds WIMS looks for low expense ratios, positive long term performance in relation to comparable funds, and stable manager tenure.

When appropriate, WIMS suggests alternative investments to further diversify portfolios. This may include asset classes such as: real estate, private equity, oil and gas, metals, minerals and other natural resources, collectibles, and private loans. The risk of investing in alternatives tends to be higher than traditional investment vehicles due to lack of liquidity, limited secondary market, higher maintenance/storage costs, as well as market conditions unique to these investments. As applicable, a complete discussion of the risks is set forth in each alternative investment's offering documents, which will be provided to the prospective client for review, acknowledgement and acceptance before investing in such investment.

Item 9 – Disciplinary Information

WIMS is required to disclose all material facts regarding any legal or disciplinary events that are material to a client or prospective client's evaluation of its advisory business or the integrity of its management.

Wyoming Investment Management Services and its management personnel have no reportable disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

The Advisor maintains its independence with regard to investment style, operations, personnel and all other areas relevant to client service and portfolio management.

Item 11 – Code of Ethics

Wyoming Investment Management Services has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at WIMS must acknowledge the terms of the Code of Ethics annually, or as amended. Annually each employee must certify that

he/she has complied with the Code of Ethics during that year. Employees are required to report any violations of the Code of Ethics promptly to Craig M. Scariot, Manager.

WIMS's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Craig M. Scariot at 307-432-4011.

Occasionally, investment objectives of clients are similar to that of the Advisory Representatives of the Advisor, and this may lead to personal investments made in the same investments as clients. WIMS's Advisory Representatives and associated persons are required to follow WIMS's Code of Ethics. Subject to satisfying this policy and applicable laws, Advisory Representatives of WIMS may trade for their own accounts in securities which are recommended to and/or purchased for the Advisor's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of WIMS will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. 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 to reasonably prevent conflicts of interest between WIMS and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with WIMS's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. WIMS will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

There may exist rare occasions when WIMS will sell a particular security for one of its clients (for example, because the client needs to raise cash or is changing investment priorities) at the same time that WIMS buys the same security for another client. By identifying a particular security and instructing a broker to sell from one account and purchase in the other, WIMS is effecting what is known as an agency "cross-trade."

Cross-trading can provide significant tangible benefits to advisory clients, in the form of savings of commissions and other transaction costs. However, issues can complicate certain cross-trades, such as when the Advisor might enter into a cross-trade transaction that is in the interests of the client on one side but not necessarily in the interests of the other side. This is because it could be difficult for a single Advisor to represent both clients equally, depending upon the facts and circumstances. In such cases, if clients participating in such trades still desire the anticipated outcome, the Advisor must provide disclosure relating to the conflicts of interest in connection with the transaction. Full disclosure is required so that each client is fully informed (especially to the one that might be disadvantaged, if applicable). As a fiduciary, the Advisor must avoid conflicts of interest with clients, or where conflicts might be unavoidable the client receives full and complete disclosure so they can make informed decisions about services received.

WIMS only rarely engages in cross-trades and only when both sides of the transaction receive the desired outcome. These transactions in no way affect the compensation paid to the Advisor and a third party service provider is utilized (Charles Schwab & Co., the clients' custodial firm) except in the case of private, illiquid securities (rarely undertaken). Further, WIMS Group does not participate in cross-trades on a principal basis because of the conflict of interest that exists in these transactions. This means that WIMS and its related persons will never have a personal interest in any security that is the subject of a cross-trade.

Item 12 – Brokerage Practices

The Advisor may give advice and take action with respect to any of its clients that may differ from advice given or the timing or nature of action taken with respect to any other particular client. It is Wyoming Investment Management Services' policy to allocate investment opportunities over a period of time on a fair and equitable basis relative to other clients. WIMS is not obligated to acquire for any account any security that WIMS has acquired for other clients or employees' personal accounts if it is not practical or desirable to acquire a position in such security for that account.

Directed Brokerage

WIMS may have complete discretion over the selection of the broker-dealer to be used. In selecting a broker-dealer for any transactions or series of transactions, WIMS may consider a number of factors, including but not limited to, the broker-dealer's historical relationship with WIMS, reputation, financial strength and stability, pricing, efficiency of execution, error resolution, research and service.

The Advisory Representatives of WIMS (if any) are not Registered Representatives of any broker-dealer firms and do not receive any commissions or fees from recommending any products or services.

WIMS often recommends the services of Charles Schwab & Co. Inc. ("Schwab"). The Advisor may execute trades through other broker-dealers at the Advisor's discretion or as requested by the client. When beneficial to the client, individual debt and/or equity transactions may be effected through broker-dealers with whom WIMS has entered into arrangements for prime brokerage clearing services pursuant to the terms and conditions of a Prime Brokerage Agreement between Schwab and the client.

WIMS recognizes its duty to obtain best price and execution for its clients under the circumstances available. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although the Advisor will seek competitive commission rates, the Advisor may not necessarily obtain the lowest possible commission rates for account transactions. While it is possible that clients may pay higher commission or transaction fees through its preferred service providers, WIMS has determined that these companies currently offer the best overall value to WIMS and its clients for the brokerage services and technology provided.

Clients are welcome to utilize the broker-dealer of their choice, and in such cases, will direct the Advisor to use a particular firm, via written direction and subject to the Advisor's right to decline

and/or terminate the engagement. The client will be responsible for negotiating terms and arrangements for the account with that broker-dealer, and WIMS will not seek better execution services or prices from other broker-dealers or be able to “batch” the client’s transactions for execution through other broker-dealers with orders for other accounts managed by the Advisor. As a result, the client may pay higher commissions, other transaction costs, greater spreads, or receive less favorable net prices on transactions for the account than would otherwise be the case. The Advisor cannot guarantee best execution of transactions in these cases due to limitations imposed by the client’s service provider either on the Advisor or in connection with transactions. Clients will need to ensure the Advisor receives copies of account statements from their preferred service provider(s).

Referral Relationships

WIMS specializes in family trust accounts and informally receives referrals from private trust companies and other investment advisors who are looking for WIMS’s expertise in tax analysis, especially as it relates to inherited, low-cost basis securities and private family holdings.

WIMS neither pays nor receives any fees for referrals.

Research and Soft Dollar Benefits

WIMS may receive traditional non-cash benefits from Schwab and other broker-dealer/custodians such as customized statements, reporting features, research, discounted or free business-related products, and support services. Any research received is used for the benefit of all clients. The Advisor occasionally receives complimentary Schwab conference attendance fees. The Advisor takes the position that this is not a material aspect in its choice of Schwab as custodian, nor does this impair the Advisor’s obligation to achieve best execution for clients.

WIMS does not receive soft-dollar benefits.

Item 13 – Review of Accounts

Investment Supervisory Services involve ongoing monitoring of clients’ managed portfolios. Internal reviews are conducted no less than quarterly. Reviews may occur more frequently depending upon individual circumstances and the nature and/or complexity of the portfolio. Internal reviews may also occur as a result of market conditions, at the time of significant deposits or withdrawals, or as otherwise determined by the Advisor. The Advisor requests that clients keep in regular contact with the Advisor and meet with the Advisor (in person or telephonically) at least annually to ensure the investment plan/strategies continue to be aligned with the clients’ stated individual needs, goals, objectives, time horizon and risk tolerance. Clients are obligated to *promptly* inform the Advisor of any change in the client’s financial condition or circumstances in order to provide the Advisor with an opportunity to consider the current information and if any changes in the investment strategy/plan are appropriate.

All client investment accounts are reviewed by Craig Scariot, Manager.

Clients can expect to receive transaction confirmations as they occur, and monthly or quarterly account statements from the broker-dealer, bank or other qualified custodian where the assets are held. The client may elect to receive transaction confirmations and statements from the

broker-dealer, bank or other qualified custodian electronically, otherwise they will be mailed. Clients may access portfolio information at any time via the custodian's website. Additionally, WIMS, generally, prepares and mails quarterly portfolio statements. Other reports are available upon request.

Financial Consulting Services are generally provided on an hourly or project base, therefore they are not ongoing in nature and terminate upon the delivery of services. These services do not provide for reviews or follow-up services unless specifically outlined in the Client Agreement or the client engages the Advisor for Investment Supervisory Services in conjunction with, or following services. Where reviews are not provided as part of the engagement, it is the client's obligation to secure additional or follow-up services with the Advisor at the client's discretion.

Item 14 – *Client* Referrals and Other Compensation

WIMS does not receive or compensate any person for client referrals. Likewise, WIMS does not receive economic benefit (i.e. sales awards or prizes) from third parties for providing advisory services to clients.

Item 15 – Custody

WIMS does not maintain actual or constructive custody of client assets.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. WIMS urges clients to carefully review such statements and compare the official custodial records to the account statements that WIMS provides. Its statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

For clients who choose Discretionary Investment Supervisory Services, WIMS usually receives discretionary authority from the client at the outset of the relationship via the broker-dealer's Limited Power of Attorney form signed by the client. WIMS has complete discretion over the selection and amount of securities to be bought or sold without obtaining specific client consent. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. Clients may specify or impose reasonable restrictions on individual securities or types of securities (for example socially responsible investments or inherited positions) for which the client does/does not want to be invested in.

Item 17 – Voting *Client* Securities

As a matter of firm policy and practice, WIMS does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. The client will receive proxies or other solicitations directly from the custodian or transfer agent. Clients are welcome to contact WIMS with any questions regarding particular solicitations.

Item 18 – Financial Information

WIMS 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. Under no circumstances does WIMS require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, WIMS is not required to include a financial statement.

Part 2B of Form ADV: Brochure Supplement**Craig M. Scariot**

Wyoming Investment Management Services
1623 Central Ave, Suite #142
Cheyenne, WY 82001
307-432-4011

This Brochure Supplement provides information about Craig M. Scariot that supplements WIMS's Brochure. You should have received a copy of that Brochure. Please contact Craig M. Scariot if you did not receive WIMS's Brochure or if you have any questions about the contents of this supplement.

Additional information about Craig M. Scariot is available on the SEC's website at www.adviserinfo.sec.gov

Item 2- Educational Background and Business Experience

Born: 1977

Educational Background:

Colorado State University, Master of Accountancy, 2010 – 2013
Colorado State University, Bachelor of Arts in Economics, 2002

Business Background:

Scariot Equipment Company, Georgetown, KY, Project Manager, 2005-2009
Colorado State University, Ft Collins, CO, Graduate Research Assistant, Dept. Agric. and Resource Economics, 2002-2003
EMH Systems, Georgetown, KY, Office Manager, 2000-2001

Item 3- Disciplinary Information

Registered investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Registered investment advisors are required to disclose all material facts regarding engagements in any other investment-related business or occupation material to your

evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 5- Additional Compensation

Registered investment advisors are required to disclose all material facts regarding non-client compensation. No information is applicable to this Item.

Item 6 - Supervision

Not Applicable

Item 7- Requirements for State-Registered Advisors

Not Applicable