



AlphaStar Capital Management, LLC

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**FORM ADV PART 2A
DISCLOSURE BROCHURE**

This brochure provides information about the qualifications and business practices of AlphaStar Capital Management, LLC. If you have any questions about the contents of this brochure, please contact us at 855-340-2514. 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.

Additional information about AlphaStar Capital Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov. AlphaStar Capital Management, LLC's CRD number is: 157423.

AlphaStar Capital Management, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of 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 adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

AlphaStar Capital Management, LLC has the following material changes to report since the previous Annual ADV Amendment filed on March 27, 2013:

1. Schedule A of Part 1 Form ADV to include our Chief Investment Officer, Steve Osterink,
2. Changed our fee payment for Financial Planning Services from arrears to due upon signing the Financial Planning Agreement,
3. Added Pension Consulting Services,
4. Added Sub-Advisory Services,
5. Revised Item 10 and 14 relating to our Affiliations, Advisory Alpha, LLC and Financial, Independence Group, Inc., Client Referrals, and Conflicts of Interest, and
6. Added Item 19 and 20 relating to Privacy, Trade Errors, and Class Action Lawsuits.

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Item 4 Advisory Business

A. Description of Advisory Firm

AlphaStar Capital Management, LLC is a Limited Liability Company organized in the state of North Carolina.

This firm has been in business since April 2011, and the principal owners are Brian K. Williams, James Ryan Cooper, Michael Evans Mullan, Philip Jon Graham, William Henry Cain, Ericka Adams Cain, and Berry H. Johnson Jr. Family Trust. Our Chief Investment Officer is Steve Mark Osterink, Jr.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we", "our" and "us" refer to AlphaStar Capital Management, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person or Investment Adviser Representative throughout this Brochure. As used in this Brochure, our Associated Persons or Investment Adviser Representatives are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

B. Types of Advisory Services

AlphaStar Capital Management, LLC (hereinafter "AlphaStar") offers the following services to advisory clients:

Investment Management Services

AlphaStar offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. AlphaStar creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

AlphaStar evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. AlphaStar will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

As part of our investment management services, we may use one or more sub-advisers to manage a portion of your account on a discretionary basis. The sub-adviser(s) may use one or more of their model portfolios to manage your account. We will regularly monitor the performance of your accounts managed by sub-adviser(s), and may hire and fire any sub-adviser without your prior approval. We may pay a portion of our advisory fee to the sub-adviser(s) we use; however, you will not pay our firm a higher advisory fee as a result of any sub-advisory relationships.

Sub-Advisory Services

We offer sub-advisory services to unaffiliated third party money managers (the "Primary Investment Adviser"). As part of these services, we will provide model portfolios, which the Primary Investment Adviser selects for their clients. We will not directly manage the Primary Investment Adviser's individual client accounts. The Primary Investment Adviser will be responsible for selecting the appropriate model for its clients.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; and debit/credit planning. These services are based on fixed fees or hourly fees and the final fee structure is documented in the Financial Planning Agreement. Notice of thirty (30) days shall be provided in the event of an increase in fees after signing a Financial Planning Agreement with us.

Pension Consulting Services

We offer pension consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan and the services requested by the plan sponsor or named fiduciary. In general, these services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options, education services to plan participants, investment performance monitoring, and/or ongoing consulting. The ultimate decision to act on behalf of the plan shall remain with the plan sponsor or other named fiduciary.

Services Limited to Specific Types of Investments

AlphaStar limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, REITs, insurance products including annuities, and government securities. AlphaStar may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

AlphaStar offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent AlphaStar from properly servicing the client account, or if the restrictions would require AlphaStar to deviate from its standard suite of services, AlphaStar reserves the right to end the relationship.

D. Wrap Fee Programs

AlphaStar does not participate in any wrap fee programs.

E. Amounts Under Management

AlphaStar has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$108,136,357	\$17,634,842	02/28/2014

Item 5 Fees and Compensation

Fee Schedule and Payment of Fees

Investment Management Services Fees

Total Assets Under Management	Maximum Annual Fee
All Assets Under Management	2.00%

These fees are negotiable and the final fee schedule is outlined in the Client Agreement. Clients may terminate their accounts without penalty within five (5) business days of signing the Client Agreement. Fees are paid quarterly in arrears. Fees may also be invoiced and billed directly to the client quarterly in arrears. Clients may select the method in which they are billed. Advisory fees are withdrawn directly from the client's accounts with client written authorization. Clients may terminate their contracts with thirty days' written notice. You will incur a pro rata charge for services rendered prior to the termination of the agreement.

Clients are not charged additional fees to cover this fee sharing agreement between AlphaStar and a sub-advisor. The fees shared will not exceed any limit imposed by any regulatory agency. Fees are paid quarterly in arrears, and clients may terminate their contracts with ten (10) days' written notice. You will incur a pro rata charge for services rendered prior to the termination of the agreement.

AlphaStar and Advisory Alpha, LLC have a fee sharing agreement in place; the allocation of the gross advisory fees between AlphaStar and Advisory Alpha is dictated by the services provided to the individual client. Please see *Other Financial Industry Activities and Affiliations* below for further information on this topic.

Sub-Advisory Services Fees

Fees and payment arrangements are negotiable and will vary on a case-by-case basis.

Financial Planning Fees

Fixed Fees

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$500 and \$5,000. Fees are payable and due upon signing the Financial Planning Agreement. The fees are negotiable and the final fee schedule will be noted on the Financial Planning Agreement. Clients may terminate their contract without penalty within five (5) business days of signing the Client Agreement. Pre-paid advisory fees that we have not yet earned will be prorated and refunded to you upon termination of the agreement.

Hourly Fees

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is \$100 - \$350. Fees are payable and due upon signing the Financial Planning Agreement. The fees are negotiable and the final fee schedule will be noted on the Financial Planning Agreement. Clients may terminate their contract without penalty within five (5) business days of signing the Client Agreement. Pre-paid advisory fees that we have not yet earned will be prorated and refunded to you upon termination of the agreement.

Pension Consulting Fees

Because pension consulting services can encompass such a wide variety of services, our advisory fees for these customized services will be negotiated with the plan sponsor or named fiduciary on a case-by-case basis. Our fees are based on a percentage of the assets in the Plan and our compensation arrangements for these services are comparable to the fees specified in the *Investment*

Management Services above. Either party to the pension consulting agreement may terminate the agreement upon written notice to the other party. The pension consulting fees will be prorated for the quarter in which the termination notice is given and any unearned fees will be refunded to the client.

AlphaStar and Advisory Alpha, LLC have a fee sharing agreement in place; the allocation of the gross advisory fees between AlphaStar and Advisory Alpha is dictated by the services provided to the individual client. Please see *Other Financial Industry Activities and Affiliations* below for further information on this topic.

Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by us. Please see Item 12 of this brochure regarding broker/custodian.

Outside Compensation For the Sale of Securities or Other Investment Products

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the *Brokerage Practices* section of this brochure.

Persons providing investment advice on behalf of our firm are licensed as independent 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 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.

Clients Have the Option to Purchase Recommended Products From Other Brokers

Clients have the option to purchase non-proprietary recommended products through other brokers or agents that are not affiliated with us.

Advisory Fees in Addition to Commissions or Markups

Our fees are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

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

AlphaStar does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 Types of Clients

AlphaStar generally provides investment advice and/or management supervisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans
- Corporations or Business Entities

Minimum Account Size

There is no account minimum.

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

A. Methods of Analysis and Investment Strategies

We provide a variety of investment strategies designed for a wide range of investors with diverse wealth management objectives. There are *Three Principles* that guide the ALPHASTAR investing process:

Active Management - Active management is used on several levels in our investing approach. This begins with asset allocation and asset selection decisions, but continues through the monitoring and rebalancing of portfolio holdings. Research indicates that short-term market timing strategies rarely generate consistent returns and may actually increase the risk of loss. We believe that a disciplined research and management approach, when applied consistently over longer time periods, can capture opportunities for improved returns.

Full Diversification - Many portfolios remain limited to a mixture of equities and fixed income securities. This overlooks important, alternative asset classes that can provide protection in periods of market volatility or decline. It is not possible to consistently predict these market movements and therefore it is critical to use true, extensive diversification throughout all market conditions. Our investment solutions give access to thousands of individual securities and a level of asset class diversification typically only employed by sophisticated, institutional investors.

Exchange Traded Products - Our investment solutions are composed exclusively of Exchange Traded Products (ETPs), such as Exchange Traded Funds (ETFs). These investment products, like mutual funds, usually consist of dozens, hundreds, or even thousands of individual securities. This method of investing provides an additional layer of oversight and management, since we select ETPs from a wide variety of globally recognized investment management firms. We believe the critical advantages of low management fees, tax efficiency, broad diversification, and additional investment oversight benefit our portfolios and better position our investors to meet their financial goals.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Asset Class Allocation - focuses on long term investments. The rise and fall of certain asset classes may not react according to predicted trends. Also, the risks associated with each underlying security (Domestic & International Stocks, Bonds, Alternative Investments, etc.) are also assumed.

Active Management - This process concentrates on factors that are believed to lead to the quality and future success of particular money managers. The risk assumed is that the manager will fail to perform as expected

Portfolio Rebalancing - Depending on the rebalancing strategy implemented, Long-term or short-term trading may be involved. Trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Short-term trading generally holds greater risk and clients should be aware that there is a material risk of loss using these types of strategies. *Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.*

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

We generally seek investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity and fixed income markets. Liquid, publicly traded alternative asset classes, such as commodities, may also be included in client portfolios and pose additional risks specific to those markets.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9 Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SR) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10 Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

We have no registrations as a Broker/Dealer or Broker/Dealer Representative.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither AlphaStar nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

We are affiliated with Financial Independence Group, Inc., 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.

We are affiliated with Advisory Alpha, LLC, an SEC-Registered Adviser. Steve Mark Osterink, Jr., our Chief Investment Officer, is also the Managing Member and Investment Adviser Representative of Advisory Alpha, LLC. We have a fee sharing arrangement with Advisory Alpha, LLC; the allocation of the gross advisory fees between us and Advisory Alpha, LLC is dictated by the services provided to the individual client. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of Advisory Alpha, LLC. You are not obligated, contractually or otherwise, to use the services of Advisory Alpha, LLC.

Arrangements with Affiliated Entities

The arrangement we have with our affiliated entity presents a conflict of interest because we may have a financial incentive to recommend our affiliate's services. While we believe that compensation charged by our affiliate is competitive, such compensation may be higher than fees charged by other firms providing the same or similar services. You are under no obligation to use our affiliate's services and may obtain comparable services and/or lower fees through other firms.

D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

AlphaStar and Advisory Alpha, LLC have agreements in place where Advisory Alpha, LLC acts as a sub-advisor and/or provides sub-advisory services for the various asset allocation models and other securities offerings available through AlphaStar.

We have a fee sharing arrangement with Advisory Alpha, LLC; the allocation of the gross advisory fees between us and Advisory Alpha, LLC is dictated by the services provided to the individual client. Clients are not charged additional fees under this fee sharing arrangement. The fees shared will not exceed any limit imposed by any regulatory agency. Fees are paid quarterly in arrears, and clients may terminate their contracts with ten days' written notice. You will incur a pro rata charge for services rendered prior to the termination of the agreement.

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

Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors,

Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Record-keeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

Participation or Interest in Client Transactions

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodian, TD AMERITRADE Institutional, Division of TD AMERITRADE, Inc., member FINRA/SIPC/NFA, was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. AlphaStar will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

1. Research and Other Soft-Dollar Benefits

AlphaStar may but currently does not receive any research, products, or other services from its broker-dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). There is no minimum client number or dollar number that AlphaStar must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for AlphaStar to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. The first consideration when recommending broker/dealers to clients is best execution.

2. Brokerage for Client Referrals

AlphaStar receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

AlphaStar will not allow clients to direct AlphaStar to use a specific broker-dealer to execute transactions. Clients must use AlphaStar recommended custodian (broker-dealer). By requiring clients to use our specific custodian, AlphaStar may be unable to achieve most favorable execution of client transactions and this may cost clients money over using a lower-cost custodian.

B. Aggregating (Block) Trading for Multiple Client Accounts

AlphaStar maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing AlphaStar the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13 Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed annually by investment advisor representatives of the firm. They are the chief advisors and are instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at AlphaStar are assigned to these reviewers.

Financial planning accounts may be reviewed upon financial plan creation and plan delivery by the investment advisor representatives of the firm.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the clients account.

Item 14 Client Referrals and Other Compensation

Solicitor Arrangements and Fees

AlphaStar may enter into solicitor agreements with other advisory firms. AlphaStar and will compensate these solicitors who refer clients to AlphaStar. Clients will sign a solicitor disclosure agreement, separate advisory agreements with AlphaStar and AlphaStar's custodian firm's new account application or limited power of attorney documents. The fee schedules may vary and the amount paid to the solicitor will be up to 65% of the total advisory fees charged to the client. Clients should review the solicitor agreement between AlphaStar and the solicitor and the client solicitor disclosure document for more information.

Solicitors that refer business to more than one investment adviser may have a financial incentive to recommend advisers with more favorable compensation arrangements. We request that our Solicitors disclose to you whether multiple referral relationships exist and that comparable services may be available from other advisers for lower fees and/or where the Solicitor's compensation is less favorable.

Licensed Insurance Agents

Persons providing investment advice on behalf of our firm are licensed as independent 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.

Refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from discount brokers in connection with utilizing their brokerage services.

Beyond the disclosures provided in this Brochure, we do not receive any compensation from any third party in connection with providing investment advice to you.

Item 15 Custody

AlphaStar, with Client's written authority, has limited custody of client's assets through direct fee deduction of AlphaStar's Fees only. Constructive custody of all client's assets and holdings is maintained primarily at TD AMERITRADE Institutional, Division of TD AMERITRADE, Inc., member FINRA/SIPC/NFA. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16 Investment Discretion

AlphaStar will manage accounts on both a discretionary and non-discretionary basis. For those clients' accounts where AlphaStar provides ongoing supervision, AlphaStar requests written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides AlphaStar discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

Item 17 Voting Client Securities

AlphaStar will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18 Financial Information

A. Balance Sheet

AlphaStar does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither AlphaStar nor its management have any financial conditions that is likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

AlphaStar has not been the subject of a bankruptcy petition in the last ten years.

Item 19 Requirements for State-Registered Advisers

AlphaStar is an SEC-Registered Adviser; hence this requirement is not applicable.

Item 20 Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

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. For accounts custodied at TD Ameritrade, as of April 1, 2014, if a profit results from correcting the trade, you will not retain the profit as all net gains (positive error accounts balances resulting from trade corrections) will be moved to a TD Ameritrade error account and subsequently donated to charity.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit. Moreover, we do not determine 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.