

**Form ADV Part 2**  
**Brochure Cover Page**

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This brochure provides information about the qualifications and business practices of Parker Investment Management, LLC.

If you have any questions about the contents of this brochure, please contact us:  
By telephone at 650-326-0387 or  
By email at [Staff@ParkerInvest.com](mailto:Staff@ParkerInvest.com).

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 Parker Investment Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Date of the Brochure: 2/20/2015

**Item 2: Summary of Material Changes****2.A Annual Update**

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

**2.B Material Changes Since the Last Annual Update**

There have been no material changes to the Brochure since the last annual update dated March 1, 2014.

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**Item 4: Advisory Business****4.A Firm Description and Principal Owner(s)**

Parker Investment Management, LLC was founded with the goal of providing sophisticated asset management services to clients in a manner that delivers results accordant with the firm's founding principles.

The founding principles that guide the firm remain consistent to this day: maintain high standards of integrity, honor, and fiduciary responsibility to clients and always consider the financial interests of the clients first. The firm specializes in implementing investment strategies using low-cost investment products whenever possible, passing the maximum benefit onto clients.

Our sole source of revenue is from client fees as specified in a written agreement for each client account. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees or referral fees are accepted.

The history of the firm dates back to 1987, when founder John W Parker began providing investment services to clients on a part-time basis in exchange for a discretionary fee. In 1999 Mr. Parker became a federally registered investment advisor, and in 2010 Mr. Parker changed his business structure from a sole proprietorship to a single-member LLC. (Being "a federally registered investment advisor" does not imply a certain level of skill or training.)

Throughout this entire period since 1987, Mr. Parker has been the sole owner. Parker Investment Management, LLC owns no subsidiaries nor is it owned by any parent company.

**4.B Types of Advisory Services**

We offer investment management services. We will evaluate and manage most publicly traded securities but primarily invest in no-load mutual funds and exchange traded funds which are low in cost, widely traded, and highly liquid. Our services include the placing of orders for the trading of a client's securities as market conditions and timing dictate.

**4.C Tailored Services and Client Restrictions**

We generally have full discretion to trade our clients' accounts, which means we decide what to buy and sell and when to do so without first consulting with our clients before making a trade. If a client wants to limit our full discretion, the client must send us written instructions. A client may limit our trading for a portion of its account to certain classes of securities such as fixed income or precious metals but may not limit our timing of when to buy or sell within those classes of securities. In order to confirm that we've received these written instructions, we will do so in writing and then limit trading in the account. It is the client's responsibility to follow up with us if our written confirmation has not been received.

A client can instruct us, either by telephone or in writing, to raise a certain amount of cash to meet the client's anticipated near-term withdrawal requirements.

**4.D Wrap Fee Programs**

We do not participate in any wrap fee programs.

**4.E Client Asset Amounts**

As of 12/31/2014, we managed approximately \$285,000,000 of client assets on a discretionary basis and no assets on a nondiscretionary basis.

**Item 5: Fees and Compensation****5.A Fee Schedule**

We offer two alternative methods for calculating our fee for our standard service ("Management Fee") – an Assets Based Method and a Gains Based/Minimum Fee Method. In order to choose the Gains-Based/Minimum Fee Method, a client must have either: (a) a minimum net worth (generally \$2 million excluding the client's primary residence) or (b) a minimum of \$1 million under management or else must be a non-U.S. resident. A client initially selects, and may change in the future, the billing method by signing our Investment Management Agreement. Our fees for our standard service are not negotiable.

Occasionally, we accept a short-term special project, the fees for which are negotiated.

**Assets Based Method of Compensation**

The Assets Based Fee Rate for 501(c)(3) organizations making an initial investment of at least \$15 million is 15 basis points (0.15%) per calendar quarter (which is roughly equivalent to an annual fee of 60 basis points (0.60%)).

The Assets Based Fee Rate for all other clients is 25 basis points (0.25%) per calendar quarter (which is roughly equivalent to an annual fee of 100 basis points (1.0%)).

The Assets Based Fee Rate is applied to the account value on the last day of the quarter to calculate the Assets Based Management Fee, adjusted for each deposit and withdrawal during the quarter as follows:

Deposit made during the calendar quarter: We will reduce the Assets Based Management Fee proportionately by subtracting an amount equal to the Deposit times the Assets Based Fee Rate times the percent of the quarter (calculated using calendar days) that that Deposit was not under management.

Withdrawal made during the calendar quarter: We will increase the Assets Based Management Fee proportionately by adding an amount equal to the Withdrawal times the Assets Based Fee Rate times the percent of the quarter (calculated using calendar days) that that Withdrawal was under management.

**Gains Based/Minimum Fee Method of Compensation**

The Management Fee using the Gains Based/Minimum Fee Method will be the larger of the Gains Based Fee or the Minimum Fee.

The Gains Based Fee is calculated as a percentage of profit in the client's account since the last time we billed using this method. Profit is calculated as the change in account value less any client deposits plus any client withdrawals. As our management generates more profit, our management fee increases. The Gains Based Fee is equal to ten percent (10%) of the Profit less a credit for any Minimum Fees paid (see below) since the last Gains Based Fee.

The Minimum Fee is calculated in the same way as the Assets Based Fee using a fee rate of 12.5 basis points (0.125%) per calendar quarter (which is roughly equivalent to an annual fee of 50 basis points (0.50%)).

## **5.B Frequency of Billing and Payment Options**

We send the client a bill for the Management Fee for each account under our management after each calendar quarter. We may choose to not send a bill if the Management Fee is less than a threshold amount of our choosing, and may instead defer billing until a future quarter. The client will have the option to pay the Management Fee either: (a) by direct payment to us; or (b) by authorizing us to deduct the Management Fee from its corresponding account(s); or (c) by instructing us to deduct the Management Fee for one or more of the client's retirement accounts from the client's non-retirement account(s) under our management. The client can indicate whether the instructions are for that calendar quarter only or whether they are also "Standing Instructions" to do the same in all future quarters. The client has the opportunity to update its instructions any time in the future, and we send the client a form to update Management Fee deduction instructions each time we send a bill even if the client has "Standing Instructions".

If we have not received the client's direct payment within thirty (30) days after we mail the client's bill for the Management Fee, then we may deduct the Management Fee from the client's corresponding account(s) without separate authorization from the client. We will notify the client in writing of any Management Fee that we have deducted from the client's account(s). Any Management Fees that are deducted from the client's account are treated as a client withdrawal when calculating future Management Fees.

## **5.C Other Fees**

We receive no other fees or expenses for our services. We help open accounts for the client at Fidelity Investments, which acts as the custodian of the client's assets and provides the client monthly statements and all year-end tax reporting detail. There are no fees for opening or maintaining accounts, but Fidelity currently charges a \$75 fee for closing an account when the assets in that account leave Fidelity's custody.

The better performing mutual funds within the broad asset classes we select as part of our core strategy usually have short-term redemption fees to discourage frequent trading. As part of our core strategy (as summarized in "Methods of Analysis, Investment Strategies, and Risk of Loss"), we plan to hold these types of mutual funds we buy for the client for at least these minimum periods, unless changing market conditions indicate the need to sell. It is important for the client to know that any short-term redemption fees that might occur (and we generally try to avoid them) are not paid to us. We sometimes choose to buy a different class of a mutual fund which currently has a \$30 buy and a \$30 sell fee charged by Fidelity if: (a) that class of the mutual fund has a lower internal fund expense ratio than the class

which has no buy or sell fees; and (b) the anticipated savings, based on our expectation of how long we will hold that fund, from the lower internal fund expense ratio will be greater than the combined buy and sell fee. Except for this difference in the class of the mutual fund, most of the funds we trade have no trading fees once the minimum holding period has been met.

If we buy or sell an individual equity or an exchange-traded fund ("ETF"), Fidelity currently charges \$7.95 for the first 10,000 shares for clients whose accounts are set up for electronic delivery of monthly statements, trade confirmations, proxies, and legal reports or the client has invested at least \$1,000,000 with us. For all other clients, Fidelity currently charges \$17.95 for the first 1,000 shares. None of these fees is paid to us, and we have no requirement to place any amount of any such trades. While some custodians may charge less for these types of trades, we have chosen Fidelity as the custodian and trading platform based on the factors summarized in Item 12.A.

All mutual funds and exchange-traded funds have internal management fees charged by their fund managers. These fund internal management fees are paid from the funds' assets and are reflected in the daily closing prices of these securities. These fees are not paid directly by the client and are not charged to the clients' accounts. We do not share in these fees in any way.

If the client chooses to use "margin borrowing" in its non-retirement account, then Fidelity currently charges margin interest for only the number of days that each amount was borrowed. There are no other charges, such as an annual fee or a minimum borrowing fee. Margin borrowing is typically used if the client writes a check without having us first raise cash. In rare circumstances and only with the client's previous written direction, we may use margin borrowing to leverage the account. We do not receive compensation in any form from Fidelity for margin interest charged.

#### **5.D Fees Paid In Advance**

We never collect our management fees in advance. They are always billed and collected for management advisory services that we have already provided.

#### **5.E Other Forms of Compensation**

We do not receive any form of compensation from the buying or selling of securities, including commissions or special pricing.

### **Item 6: Performance-Based Fees and Side-By-Side Management**

As described in "Item 5: Fees and Compensation", our Management Fee in some of our accounts is determined using the Gains Based/Minimum Fee Method. This method is a performance-based fee, which means that our fee is based on a share of the gains in the account. As also described in "Item 5: Fees and Compensation", our Management Fee in other of our accounts is determined using the Assets Based Method.

We decide whether or not to trade in an account by looking at each security (e.g. "position") we hold across all our accounts, not which account a particular security is held in. In making



our decision to trade a position, we have software to "query" all our accounts to see which accounts meet the "query" criteria. For example our query might include: (a) how long we have held that position (e.g. shorter or longer than the minimum holding period for that position to avoid short-term trading fees); (b) what percentage of the account that position represents; (c) what percentage of an asset class that security represents; (d) the dollar value of the position in the account; and (e) whether the account is a retirement or a non-retirement account. We do not take into consideration which billing method the account uses when we are considering which trades to make, and therefore we do not believe that we have any conflict of interest that might arise from favoring accounts using the Gains Based/Minimum Fee Method over accounts using the Assets Based Method.

## **Item 7: Types of Clients**

We provide investment advisory services to individuals, individual pension and profit share plans, trusts, estates, nonprofit organizations, corporations, and other business entities. There is no minimum account size required to open or maintain an account.

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

### **8.A Investment Strategies**

Our core investment strategy has two key elements. First we determine the relative weightings within the client's parameters to give to different asset classes based on our evaluation of which will outperform market averages for months and sometimes years. Then we implement the allocations to those asset classes by identifying what we believe will be the best performing no-load mutual funds and/or low expense ratio ETFs within those asset classes. A key component of our strategy is the low cost of the underlying funds that we use.

We buy many mutual funds and ETFs that are index funds. We choose these, not only because of their low expense ratios, but also because index funds are often the ideal way to get exposure to various asset classes. We generally prefer to use index funds for our US equity investments because index funds give better and more consistent performance than most managed funds in this area. However, for fixed income and foreign equities, we often prefer to choose the best managed mutual funds because we have found that well managed funds can do much better than index funds in these areas, with lower volatility.

While we often use passive index funds in implementing our strategy, our approach should be characterized as active management because of our asset allocation and fund selection decisions. We invest in all asset classes, but we vary the weighting of different asset classes during different periods depending on market conditions. We pay particular attention to the relative weightings of the following major asset classes:

- Fixed income versus equity
- US versus foreign equities
- Developed versus emerging markets
- Large- versus mid- versus small-cap stocks
- Growth versus value stocks

The method of using a flexible rather than a static allocation is sometimes referred to as dynamic asset allocation. GMO has been a long-time proponent of applying this method using relative asset-class valuations as the key input. An informative article summarizing why that firm advocates this method is *The Road Less Traveled: Minimizing Shortfall and Dynamically Allocating in DC Plans* by James Sia (August 2014), which concludes, "While dynamic asset allocation is a road less traveled today, it should be the investment superhighway of tomorrow." (That article is accessible online by typing the title into a search box.)

At some point, when economic or other fundamental factors have changed and valuations have reached an extreme, a trend ends or reverses. But trends often continue for longer periods of time than the fundamentals would suggest, in part because of the tendency of investors to chase performance. (Abby Joseph Cohen of Goldman Sachs famously coined a metaphor for this – "Silly Putty" -- in the context of business expansions, invoking the image of the wad of kids' playstuff that just keeps stretching when pulled into a long strand using two hands.) For this reason, an approach to dynamic allocation using relative valuations as the primary factor would sometimes call for making changes too early. We have skill in identifying trend changes early but not too early and use a variety of indicators in addition to relative valuations to make this determination, as discussed in Item 8.C, Research and Analysis.

## **8.B Investment Principles**

Minimizing the costs of investing is vital for long-term investment success. Research by Morningstar has determined that the level of fees charged by mutual funds is the most effective indicator of future returns (inverse relationship, i.e. higher fees predict lower returns). Costs matter because investment returns are reduced dollar-for-dollar by the fees, commissions, and transaction expenses incurred. We seek to keep the cost of managing the portfolio low.

In taxable accounts, taxes can have a significant impact on the net performance. In those accounts, we seek to maximize after-tax returns, but taxes are not the sole driver of investment decisions.

Account performance varies from account to account, depending on such factors as when moneys were deposited or withdrawn and whether the account is taxable or nontaxable.

## **8.C Research and Analysis**

In undertaking the dynamic asset allocation summarized in Item 8.A, we analyze a variety of factors.

We identify price trends by looking at charts comparing relative strength of different asset categories using a proprietary system which we developed. We also identify trends by paying attention to data relating to money flows, such as mutual fund flow data. We get information about institutional fund flows by listening to institutional asset managers and reading their commentaries. We pay close attention to studies of investor sentiment and how investors are investing their money. Interpreting this information is an art. When everyone likes an asset class, it is probably near a top, but smart institutional investors often

give the first indication of a trend change when they begin to show interest in an out-of-favor asset class.

We also pay close attention to volatility, which often gives us information about whether a trend is in an early or a late stage. Volatility tends to increase as valuations become extended in the late stages of a trend, which is a signal for us to begin to readjust our holdings.

#### **8.D Sources of Information**

The main sources of information that we draw from include real-time market data and quotes purchased from various vendors, live market news provided online and on television networks, proprietary research purchased by subscriptions, research materials prepared by others, product-specific research analyses conducted by the investment staff during due diligence processes, phone calls and interviews with mutual fund management teams, financial newspapers and magazines, newsletters, and other electronic financial publications.

#### **8.E Risk of Loss**

Measuring the success of an investment strategy often consists of comparing its performance and volatility to a market benchmark, such as the S&P 500 Index with dividends reinvested. The risks associated with a specific investment strategy is that that strategy has higher volatility and underperforms this market benchmark, or even has lower volatility and outperforms the benchmark but still loses money because the benchmark lost even more.

The financial industry generally considers investments in securities that are 100% backed by the U.S. government (e.g. CD's, treasury notes) to be risk free. It is our belief that any investment that is not backed by the U.S. government has significant risk. We however invest in non-U.S. government-backed securities because we believe that there are better investment strategies than U.S. government-backed securities that have reasonable levels of risk. This, however, is always a judgment on our part, never a certainty.

We encourage our clients to invest with a "long-term" view of at least several years, avoiding the urge to get out of the market when it is down and then get back in when it is up. Throughout the market's history, there have always been crises in the world, and we encourage the client to let us navigate the client's account through the inevitable ups and downs. As the client's financial advisor, we will do our best to grow the client's account. We explain to the client that there are always inherent risks in all investing; it is possible that the client's account(s) may incur substantial losses, and the client must be prepared to bear these risks.

The key risks to any investment strategy include: (a) past performance does not predict future performance, which means that what may have worked or not worked in the past may or may not have anything to do with what may or may not work in the future; (b) unanticipated world events, such as political upheavals, nuclear disasters, terrorist attacks, or "acts of nature" (e.g. earthquakes, floods, tornadoes, tsunamis); (c) financial or business disasters, such as the ENRON scandal or the collapse of financial institutions in the U.S. in

2008; and (d) general "market uncertainties" (e.g. political uncertainty about what "Washington" might do or not do, economic uncertainty about how China may or may not control its inflation, energy pricing uncertainty about what the future price of oil might be) among investors which can result in elevated levels of volatility. These risks have always been and always will be present, and investments might always be impacted by these risks.

**Item 9: Disciplinary Information**

We have never had any type of legal or disciplinary action that could affect anyone's evaluation of our advisor business or the integrity of our management.

**Item 10: Other Financial Industry Activities and Affiliations****10.A Broker-Dealer Affiliations**

Neither our company nor any of our personnel is registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

**10.B Futures and Commodity Affiliations**

Neither our company nor any of our personnel is registered or has an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

**10.C Related Person Affiliations**

We have no relationship or arrangement with any individual or company that creates a material conflict of interest with our clients.

**10.D Affiliations With Other Investment Advisors**

We do not recommend or select other investment advisors for clients, and we do not receive compensation directly or indirectly from any other investment advisors.

**Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading****11.A Summary Description of Our Code of Ethics**

Our firm has adopted the CFA Institute Code of Ethics and the Standards of Professional Conduct. A copy of the Code of Ethics and the Standards of Professional Conduct will be furnished to clients or prospective clients upon request.

The following is a brief summary of the Code of Ethics:

1. We will place the interests of clients ahead of the firm's or any employee's own financial interests.

2. We will uphold our fiduciary duty to clients and conduct ourselves with integrity, competence, diligence, and respect and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets.

3. Employees are expected to conduct their personal securities transactions in accordance with the Personal Trading Policy and will strive to avoid any actual or perceived conflict of interest.

4. Employees are expected to comply with federal and state of California securities laws.

5. We will strive to maintain and continually enhance our professional knowledge regarding fiduciary investing principles, asset allocation, and risk management.

6. We will seek at all times to preserve our independence and maintain complete objectivity with respect to the advisory services and recommendations made to clients.

7. Employees are expected to exercise diligence and care in maintaining and protecting client information.

### **11.B Interest in Recommended Securities**

Neither we nor a "related person" recommends to clients or buys or sells for client accounts, securities in which we or a "related person" has a material financial interest.

### **11.C Investing in the Same Securities That We Invest in for Clients**

We invest in the same securities that we invest in for clients. Our trading does not create a material difference in the price of mutual funds and exchange traded funds that we buy and sell in our accounts compared to the prices that we buy and sell these for in our clients' accounts. Our trading also does not create a material difference in the price of any individual securities that we hold in both our personal and our client accounts.

### **11.D Contemporaneous Trading**

All mutual funds that we buy and sell on any day in our own accounts are priced identically to any buys and sells in the client accounts. We generally, but not always, buy and sell individual equities and exchange-traded funds using block transactions that provide the same price for any buys or sells in all accounts placed during that trading day.

## **Item 12: Brokerage Practices**

### **12.A Factors Considered in Broker Selection**

We have chosen National Financial Services LLC and Fidelity Broker Services LLC (collectively, and together with all affiliates, "Fidelity") for our client accounts. We have an arrangement with Fidelity through which it provides us with "institutional platform services". The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist us 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 allocated aggregated trade orders for multiple client accounts; (c) provide research, pricing and other market data; (d) facilitate payment of fees from its clients' accounts; and (e) assist with back-office functions, record keeping, and client reporting. Fidelity, not us, is responsible for executing all securities trades.

We are independently operated and owned and are not affiliated with Fidelity.

Fidelity does not charge our company 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 Fidelity or settle into Fidelity accounts (e.g. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

Fidelity is providing us with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

We have chosen Fidelity as the custodian and trading platform for all client accounts for the following reasons: (a) there are no fees for opening or maintaining accounts; (b) there are no fees for buying or selling no-load mutual funds as part of our core strategy provided that these funds are held for their minimum holding period, except as described in "Item 5: Fees and Compensation"; (c) Fidelity provides one-day settlement (e.g. the funds from a sale are available in the account on the next market day) on the sale of most mutual funds; (d) Fidelity provides excellent on-line access at no charge for clients to monitor account activity and to get duplicate copies of recent monthly, year-end, and tax-reporting statements; (e) Fidelity provides the client with the year-end information that is both necessary for tax reporting and is complete and relatively easy to use; (f) Fidelity provides us trading execution software, electronic detailed snapshots and trading history of all accounts, electronic trade confirmations of all trades placed, electronic monthly and year-end statements for all accounts, and a full range of back-office support staff and functions, all such services provided at no cost to either the client or to us; and (g) working with one custodian and trading platform simplifies and reduces the chance of error in our advisory functions.

We are free to choose from thousands of mutual funds, exchange-traded funds, and individual stocks; we have absolutely no requirements to purchase any "branded" Fidelity mutual funds.

## **12.B Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers.

## **12.C Directed Brokerage**

We do not permit clients to direct brokerage.

**Item 13: Review of Accounts****13.A Periodic Account Reviews and Reviewers**

Mr. Parker assisted by his staff generally reviews the clients' holdings on a daily basis.

**13.B Other Account Review Triggers**

Factors which may trigger a more detailed level of review include changes in the market, tax considerations, size of trade, size of allocations to market sectors, information about certain securities, and conversations with the clients. The review process is performed by Mr. Parker assisted by his staff.

**13.C Content of Regular Reports**

The clients receive monthly statements directly from Fidelity. The statements show all trades made in the client's account, the securities positions, and the account value. The clients are able to obtain information about their accounts directly from Fidelity through Fidelity's website on a real-time basis.

**Item 14: Client Referrals and Other Compensation****14.A Incoming Referrals**

Our business has grown in large part due to referrals our clients have made. We appreciate these referrals, but we do not directly or indirectly compensate anyone for client referrals.

**14.B Other Compensation**

There is no one who provides us an economic benefit for providing investment advice or other advisory services to our clients.

**Item 15: Custody**

We never have custody of client assets. A client's assets are never commingled with assets of any other investor.

We urge all clients to review the Fidelity statements to confirm that all account transactions, including deductions to pay our management fees, remain proper and to contact us with any questions.

**Item 16: Investment Discretion**

We generally have full discretion to trade our clients' accounts, which means we decide what to buy and sell and when to do so without first consulting with our clients before making a trade. The client gives us this authority when he/she signs our Investment Management Agreement and receives a current copy of this disclosure document, which is our required agreement before we begin managing an account for a client. In addition, each

account that we help the client open at Fidelity includes authorization for us to trade within that account.

If a client wants to limit our full discretion, the client must send us written instructions. A client may limit our trading for a portion of its account to certain classes of securities such as fixed income or precious metals but may not limit our timing of what to buy or sell within those classes of securities. In order to confirm that we've received these written instructions, we will do so in writing and then limit trading in the account. It is the client's responsibility to follow up with us if our written confirmation has not been received.

A client can instruct us, either by telephone or in writing, to raise a certain amount of cash to meet the client's anticipated near-term withdrawal requirements.

A client always has the choice to stop using our investment advisory services and can terminate our services at any time by providing written notice to us. In order to confirm that we've received these written instructions, we will do so in writing and then end our management of the account. It is the client's responsibility to follow up with us if our written confirmation has not been received.

## **Item 17: Voting Client Securities**

It is always the responsibility of each client to vote (or not to vote) its own securities. We do not accept authority to vote client securities.

## **Item 18: Financial Information**

### **18.A Balance Sheet Disclosure**

A Balance Sheet is not required to be provided because we do not require or solicit any form of prepayment from a client before we provide our services.

### **18.B Financial Disclosure**

We do not have any financial condition that will interfere with our ability to meet any contractual commitments to our clients. Each account is in the client's name and can be traded by the client directly with Fidelity if we are unable, for any reason, to continue to manage the account.

### **18.C Bankruptcy Disclosure**

We have never been the subject of a bankruptcy petition.

## **Item 19: Requirements for State-Registered Advisers**

We are not a state-registered advisor.



**Form ADV Part 2B**  
**Brochure Supplement**

Parker Investment Management, LLC

PO Box 1088  
Menlo Park, CA 94026

Phone: 650-326-0387  
Email: [Staff@ParkerInvest.com](mailto:Staff@ParkerInvest.com)

This brochure supplement provides information about John Parker that supplements the Parker Investment Management, LLC brochure. You should have received a copy of that brochure. Please contact Howard Franklin if you did not receive Parker Investment Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about John Parker is available on the SEC's website at  
[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Date of the Supplement: 2/20/2015

**Educational Background and Business Experience**

Mr. Parker was born in 1944. His formal education background is a BA in English from Yale University in 1974.

Beginning in 1987, Mr. Parker began providing investment services to clients on a part-time basis in exchange for a discretionary fee, and in 1996 Mr. Parker was providing these services on a full-time basis. Mr. Parker became a federally registered investment advisor in 1999, and in 2010 changed the form of his business to a single-member LLC.

**Disciplinary Information**

Mr. Parker has never had any material legal or disciplinary events.

**Other Business Activities**

Mr. Parker does not have any other investment-related business or occupation, or any application pending.

**Additional Compensation**

Mr. Parker is the sole owner of Parker Investment Management, LLC. As such, his compensation depends on how well the business is doing. He receives no other form of compensation.

**Supervision**

Mr. Parker is the sole owner of Parker Investment Management, LLC, and there is no one else responsible for his supervision.

**Requirements for State-Registered Advisers**

Mr. Parker is not a state-registered advisor.

**Form ADV Part 2B**  
**Brochure Supplement**

Parker Investment Management, LLC

PO Box 1088  
Menlo Park, CA 94026

Phone: 650-326-0387  
Email: Staff@ParkerInvest.com

This brochure supplement provides information about Shijun Liu that supplements the Parker Investment Management, LLC brochure. You should have received a copy of that brochure. Please contact Howard Franklin if you did not receive Parker Investment Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Shijun Liu is available on the SEC's website at  
[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Date of the Supplement: 2/20/2015

**Educational Background and Business Experience**

Mr. Liu was born in 1981. His formal education background is a BS in Computer Systems Engineering from Stanford University in 2003.

Mr. Liu has worked for the firm since 2005 and assists Mr. Parker in building and executing the firm's investment strategies consistent with the firm's policies and guidelines and within the parameters specified by the firm's clients.

Mr. Liu is an active member of the CFA Institute and the CFA Society of San Francisco and is a Level III CFA Candidate.

**Disciplinary Information**

Mr. Liu has never had any material legal or disciplinary events.

**Other Business Activities**

Mr. Liu does not have any other investment-related business or occupation, or any application pending.

**Additional Compensation**

Mr. Liu receives no other form of compensation.

**Supervision**

Mr. Liu is supervised by Mr. Parker, who must approve all trades placed in client accounts on behalf of Parker Investment Management, LLC.

**Requirements for State-Registered Advisers**

Mr. Liu is not a state-registered advisor.