

“Invest with Peace of Mind”™



Buffalo Capital Corporation

4299 MacArthur Blvd
Suite 100
Newport Beach, CA 92660
(949) 476-2799
www.BuffaloCapital.com

Form ADV Part 2A & 2B Brochure

March 21, 2017

This brochure provides information about the qualifications and business practices of Buffalo Capital Corporation. If you have any questions about the contents of this brochure, please contact us at (949) 476-2799. 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 Buffalo Capital Corporation also is available on the SEC's website at www.adviserinfo.sec.gov.

Buffalo Capital Corporation 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.

Buffalo Capital Corporation

Item 2 – Material Changes

The purpose of this page is to inform you of material changes since the previous annual update to the Form ADV Part 2A & 2B brochure.

The Material Changes section of this brochure will be updated at least annually. When material changes to the brochure have occurred since the last annual update a copy of this page will be sent to you.

There are no material changes since the last update.

Our complete Form ADV Part 2A & 2B brochure may be requested by contacting our firm by telephone at (949) 476-2799 or by email at: admin@buffalocapital.com.

Item 3 – Table of Contents

Item 1- Cover Page	1
Item 2- Material Changes	2
Item 3- Table of Contents	3
Item 4- Advisory Business	4
Item 5- Fees and Compensation	6
Item 6- Performance-Based Fees	7
Item 7- Types of Clients	7
Item 8- Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9- Disciplinary Information	10
Item 10- Other Financial Industry Activities and Affiliations	10
Item 11- Code of Ethics	10
Item 12- Brokerage Practices	11
Item 13- Review of Accounts	12
Item 14- Client Referrals and Other Compensation	12
Item 15- Custody	13
Item 16- Investment Discretion	13
Item 17- Voting Client Securities	14
Item 18- Financial Information	14
Item 19- Privacy Policy	15
 Form ADV Part 2B Brochure Supplement - Jeffrey Vieth, CFP®	 16
Form ADV Part 2B Brochure Supplement - Kurt Beimfohr	20

Item 4 – Advisory Business

Firm Description

Buffalo Capital Corporation (“Buffalo Capital”), a California corporation, is an independent, fee-only SEC Registered Investment Advisor (RIA). The firm was founded in 1981 and is based in Newport Beach, CA.

Buffalo Capital provides professional portfolio management services on a discretionary basis to individuals, high net worth individuals, investment advisors, corporate pension, profit-sharing and 401k plans, trusts, estates and charitable institutions. Our core mission is to preserve and consistently grow our clients’ liquid assets with individualized attention and objective advice. We are committed to active risk management, a philosophy which is reflected in the design and management of all our portfolios.

Investment Advisory Services

Buffalo Capital provides portfolio management and investment advisory services to direct clients of the firm. Investment advisory services include giving continuous investment advice to the client (making investments for the client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client’s personal and family obligations. On an occasional basis, we furnish advice (such as financial planning advice) to direct clients on matters not involving securities. We do not charge a separate fee for this advice.

Buffalo Capital also acts as a sub-adviser to non-affiliated third party RIAs and manages client accounts referred to the firm by outside solicitors. Buffalo Capital provides portfolio management services to these clients based on each individual client’s needs as determined by their advisor.

Buffalo Capital obtains full discretion from clients to buy and sell securities within client accounts; therefore, clients may not impose restrictions on investing in certain securities or types of securities. From time to time we will hold certain securities such as individual stocks in a client’s account at the client’s specific request. We will not liquidate these positions until the client requests that we do so.

Buffalo Capital offers investment advisory services for a fee based on assets under management. We do not bill on an hourly basis, charge subscription fees, participate in wrap fee programs or receive commissions.

Principal executive officers, management persons and employees important to the firm’s investment strategies are required to have a college degree and experience demonstrating the ability to handle the required duties. These individuals with their education and business background are described in ADV Part 2B.

Item 4 – Advisory Business (Continued)

Firm Ownership

Buffalo Capital's majority owner is the Vieth Family Trust. This trust is controlled by Jeffrey Vieth who is the Chief Executive Officer and Chief Compliance Officer of the firm. Kurt Beimfohr, President, is a minority owner through the KAB Family Trust.

Client Assets

As of December 31, 2017 client assets under management totaled \$130,379,124.47. Virtually all of these client assets are managed on a discretionary basis.

Item 5 – Fees and Compensation

Management Fees- Separately Managed Accounts. As compensation for services rendered, Buffalo Capital charges a management fee. Lower fees for comparable services may be available from other sources. The asset-based management fee is determined in accordance with the following blended fee schedule:

- Managed Income, Opportunistic Income and Balanced Strategies

<u>Value of accounts</u>		<u>Annual Fee</u>
First	\$ 1,000,000	1.50%
Next	1,000,000	1.25%
Next	1,000,000	1.00%
All amounts over	3,000,000	.75%

- Tax Free Municipal Bond Portfolio

<u>Value of accounts</u>	<u>Annual Fee</u>
\$2,000,000 – 5,000,000	0.35%
5,000,000 – 10,000,000	0.25%
Above 10,000,000	0.15%

The management fee is calculated on the sum of all assets under management for each client whether the client has one account or multiple accounts. The fee is computed quarterly and is deemed payable in advance. The fee is payable on the effective date of the client's investment advisory agreement prorated to the next billing date. Thereafter, the fee is payable on the first day of each calendar quarter (i.e., January 1, April 1, July 1, and October 1). The fee is refundable on a pro rata basis upon receipt of written notice from the client requesting termination of the investment advisory agreement.

As compensation for sub-advisory portfolio management services to clients of non-affiliated registered investment advisors (RIA) BCC is paid a quarterly management fee by the client. The fee is negotiable and may vary depending on the strategies, the services provided, and the total value of each non-affiliated RIA client's assets managed by BCC.

For special circumstances, the fee structure and/or billing plan may be negotiated between Buffalo Capital and the client.

Item 5 – Fees and Compensation (continued)

Other Fees. All mutual funds, exchange-traded funds and variable insurance products charge separate fees (management fees and other operating expenses) as described in their applicable prospectuses. Clients pay their pro rata share of these fees in addition to those fees charged by Buffalo Capital.

Buffalo Capital utilizes “no transaction fee” mutual funds as well as “transaction fee” mutual funds depending on the portfolio strategy. Exchange-traded funds (ETFs) may also be used. The transaction fees and commissions for these vehicles are charged and retained by the custodian brokerage firm. Buffalo Capital does not participate in any of these fees or commissions.

Item 6 – Performance-based Fees

Currently there are no clients with a performance fee arrangement and there are no plans at this time to enter into performance fee arrangements with any clients.

In the past, Buffalo Capital has entered into performance fee arrangements with qualified clients: such fees are subject to individualized negotiation with each such client.

Item 7 – Types of Clients

Buffalo Capital provides portfolio management services to individuals, high net worth individuals, corporate pension, profit-sharing and 401k plans, trusts, estates and charitable institutions, both as an advisor and as a sub-advisor to clients of non-affiliated registered investment advisors.

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

Investment Philosophy

Buffalo Capital focuses on the preservation and consistent growth of clients' liquid assets. We are committed to active risk management, a philosophy which is reflected in the design and management of all our portfolios. We seek to dampen overall portfolio volatility and deliver attractive risk-adjusted returns. To varying degrees, each of our investment strategies attempts to provide some level of downside protection while allowing for upside participation in the market.

Methods of Analysis

Our conservative approach to portfolio management incorporates a tactical asset allocation component in addition to strategic asset allocation. Buffalo Capital leverages both fundamental and technical research and analysis in order to make investment decisions. In addition to our own internal research and analysis, we receive research and analysis from external sources including brokerage firms, mutual fund companies and other firms in the financial services industry. Some of this research and analysis is available at no cost and some is purchased by Buffalo Capital.

Step One: Objective Setting

We seek to obtain a clear understanding of the client's investment goals based on the client's expectations and time horizon, as well as the client's ability and willingness to assume risk. We use this information to establish an appropriate portfolio strategy consistent with the client's investment objectives.

Step Two: Asset Allocation

Our asset allocation process begins with our assessment of the impact of various factors such as economic indicators, monetary policy and political developments on the financial markets. We then implement a portfolio strategy that is consistent with the client's goals and objectives by deploying assets across equity (stocks), fixed income (bonds) and cash asset classes.

Step 3: Sector Allocation

Sector selection adds further diversification to the portfolio matrix by allocating across a variety of sectors which may or may not include large, mid or small cap, value or growth equity funds, as well as U.S. Government or corporate fixed income funds. Each portfolio consists of a "core position" which trades infrequently, in addition to a "tactical position" which trades a few times each year.

Step 4: Investment Selection

While we primarily select funds with a demonstrated track record of consistently superior returns, it is critical to look beyond historical performance and understand the unique characteristics of each fund. We routinely conduct internal research and meet face-to-face with fund providers to ensure we have a thorough understanding of manager philosophy and fund investment style.

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

Step 5: Portfolio Review Process

The portfolio review process consists of the daily monitoring of the stock and bond markets and based on our decision models, the increase, reduction or hedging of the client's equity and/or fixed income assets consistent with our defensive management style. In addition, sector allocations are changed based upon our forward-looking assessment of investment risks and opportunities within the current economic cycle.

Investment Strategies

Buffalo Capital currently offers three distinct investment strategies: Managed Income, Opportunistic Income and Balanced. In addition, we offer municipal bond portfolio management for high net worth individuals through a non-affiliated independent registered investment adviser who acts as a sub-adviser to Buffalo Capital.

Managed Income: An actively managed fixed income strategy

For conservative investors who seek to generate consistently positive returns while maintaining daily liquidity at all times. Our Managed Income strategy targets a positive total return during all one-year periods through active risk management with an emphasis on fixed income securities. Investors in our Managed Income strategy should experience low downside principal volatility.

Opportunistic Income: A diversified tactical fixed income strategy

For moderate investors who are comfortable using a flexible approach to take advantage of opportunities across a wide array of fixed income sectors. Our Opportunistic Income strategy has the ability to generate positive returns in both up and down fixed income market environments. Investors in our Opportunistic Income strategy are comfortable with moderate downside volatility in pursuit of potentially higher returns.

Balanced: Diversified equity and fixed income strategies

For conservative to aggressive investors who are comfortable taking on stock market risk in order to have the opportunity for meaningful growth over a long-term investment horizon. Our balanced portfolios blend varying degrees of equity and fixed income exposure to tailor the level of risk and potential return to meet each individual client's objectives. Investors in our balanced portfolios accept downside principal volatility in the pursuit of potentially greater returns over the long run.

Risk of Loss

All investment programs have certain risks that are borne by the investor, including the risk that an investor may lose a part or all of his or her investment. Risk refers to the uncertainty that the actual return the investor realizes could differ from the expected return. Buffalo Capital is committed to active risk management, a philosophy which is reflected in the design and management of all our portfolios. To varying degrees, each of our investment strategies seeks to provide a meaningful level of downside protection.

Item 9 – 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 Buffalo Capital or the integrity of Buffalo Capital's management.

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10 – Other Financial Industry Activities and Affiliations

Jeffrey Vieth, CEO of Buffalo Capital, has held a State of California Life and Health Insurance license since 1972. Mr. Vieth receives commissions from various insurance companies and agencies for insurance products purchased by individuals. These individuals on a rare occasion may also be clients of Buffalo Capital. These insurance products are neither securities nor investment products and are unrelated to the business activities of Buffalo Capital. As a general practice, Mr. Vieth does not recommend insurance products to clients of Buffalo Capital.

Mr. Vieth is also President and owner of The Vieth Company, a California Corporation, which provides contract office services to individuals and small companies.

Mr. Vieth spends more than 95% of his time committed to business activities on the business of Buffalo Capital.

Item 11 – Code of Ethics

The Code of Ethics is intended to reflect the fiduciary principles that govern the conduct of BCC and its employees where BCC is providing investment advice to its clients.

Employees of Buffalo Capital shall not divulge or discuss privileged information regarding its clients with anyone other than the client's solicitor, the custodian of the client's assets if applicable or a fellow employee.

Employees of Buffalo Capital shall not take or have the ability to take possession of client assets.

Employees of Buffalo Capital shall answer all inquiries from clients and solicitors in a timely and courteous manner.

Employees of Buffalo Capital shall follow all rules of the Investment Advisor Act and the rules and regulations of the various states in which we do business.

Item 11 – Code of Ethics (continued)

In adopting this Code of Ethics, the Firm recognizes that it and its Supervised Persons owe a fiduciary duty to the Firm's clients and must at all times:

- Place the interests of Firm clients first;
- Avoid any actual or potential conflict of interest or any situation that has the appearance of a conflict of interest or impropriety;
- Abide by all applicable federal and state securities laws;
- Use reasonable, independent professional judgment when conducting investment analysis, making investment recommendations, or taking investment actions on behalf of clients;
- Keep information concerning the financial circumstances of Firm clients confidential;
- Never intentionally mislead a client or prospective client;
- Never engage in any act, transaction, practice, or course of business which would operate as a fraud or deceit; and
- Avoid any abuse of a position of trust and responsibility.

All Supervised Persons must be familiar with, and comply with this Code of Ethics as a term of their employment. If there is any doubt about the applicability of any law, rule or regulation, the Supervised Person should seek advice from his or her supervisor or the Firm's Compliance Department. All Supervised Persons should keep in mind that their behavior and activity reflects upon the Firm and all Supervised Persons are responsible for protecting the Firm's reputation.

Item 12 – Brokerage Practices

Buffalo Capital recommends third party custodian brokerage firms where mutual funds can be traded for a nominal transaction fee and in some cases no transaction fee. We also recommend custodian brokerage firms where stocks, bonds, options and exchange traded funds (ETFs) can be traded with good execution and competitive commissions. Buffalo Capital does not share in any of these transaction fees or commissions. The custodian brokerage firms provide to Buffalo Capital, at no cost, software which enables us to monitor client accounts efficiently and periodic newsletters dealing with compliance issues. We do not receive referrals from third party custodians (discount brokerage firms).

Buffalo Capital primarily recommends mutual funds. Since mutual funds are normally priced once each day at the close of the markets, all clients receive the same price. Therefore, it is neither possible nor necessary to aggregate orders to purchase and sell mutual funds.

When Buffalo Capital trades ETFs block trades are utilized so that all clients receive the same price.

Item 12 – Brokerage Practices (continued)

The officers and employees of Buffalo Capital purchase and sell mutual funds that are also recommended to clients. These transactions are generally made at the same time and price as for clients based on the firm's decision models, but the officers and employees of Buffalo Capital reserve the right to effect transactions independent of its decision models. Since mutual funds are normally priced once each day at the close of the markets, we do not believe these transactions create any conflicts of interest.

Item 13 – Review of Accounts

Buffalo Capital manages portfolios through a continuous review process (tactical allocation) plus a regular periodic review process (strategic allocation). These portfolio reviews are conducted by an officer of the firm.

The continuous review process consists of the daily monitoring of the stock and bond markets, our analysis of the economic climate and the signals provided by tactical decision models. Reviews may result in the increase, reduction or hedging of the clients' equity and/or fixed income assets consistent with our defensive management style.

All accounts are reviewed on a timely basis to verify the accuracy of individual account transactions at the time a transaction is made. These transaction reviews are conducted by administrative personnel under the direct supervision of an officer of Buffalo Capital.

Buffalo Capital sends quarterly update letters to its clients along with quarterly reports and invoices in January, April, July and October. Custodian brokerage firms provide a gain/loss summary (Form 1099) for tax purposes for taxable accounts.

The brokerage firm and/or mutual fund will provide a confirmation directly to the client following each transaction and a monthly and/or quarterly statement which summarizes all activity in the account.

Item 14 – Client Referrals and Other Compensation

BCC directly compensates Solicitors for client referrals by paying them an amount up to fifty percent of the management fees received by BCC. Under this arrangement, the client is not paying a higher management fee to BCC than would be the case if there were not a solicitor. The client receives a copy of a "Solicitors Agreement" disclosing this compensation and the client signs an agreement that he or she has received and understands this disclosure document.

Item 15 – Custody

All client accounts are maintained at independent third party custodians (brokerage firms, mutual fund companies or insurance companies). Buffalo Capital does not have access to client funds except that with the client's written authorization, Buffalo Capital will liquidate management fees directly from the client's account. The account registration is and shall remain in the name the client elects. Clients may have multiple accounts, e.g., a joint tenants account plus an IRA account plus a trust account, all controlled by same client.

All investments purchased by Buffalo Capital on behalf of clients have daily liquidity. Upon a client's request, Buffalo Capital will have the custodian send a check payable to the client for all or part of the client's investment.

Clients should receive statements at least quarterly from the custodian brokerage firm, insurance company, bank or other qualified custodian that holds and maintains client's investment assets. Buffalo Capital urges clients to carefully review such statements and compare such official custodial records to the account statements that we provide to the client. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Buffalo Capital receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Buffalo Capital observes the investment policies and restrictions of the clients for which it advises.

The client agrees that Buffalo Capital will have full discretion to buy and sell securities within the account without prior notification. Buffalo Capital will exercise its best judgment in making these transactions.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Buffalo Capital 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 understands that Buffalo Capital does not, and will not, vote proxies on securities owned by the client. Proxy statements are sent directly to the client by the custodian so that the client may or may not vote according to the client's desire.

Item 18 – Financial Information

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about Buffalo Capital's financial condition.

Buffalo Capital 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.

Item 19 - Privacy Policy

Buffalo Capital is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from clients in connection with any of the services provided by our firm. We have never disclosed information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising our clients first. We use financial information that clients provide to us to help clients meet their financial goals while guarding against any real or perceived infringements upon their rights of privacy. Our policy with respect to personal information is listed below.

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about our clients with a custodian brokerage firm in order to execute securities transaction on the client's behalf, or so that our firm can discuss a client's financial situation with his or her accountant or lawyer.)
- We maintain a secure office and computer environment to ensure that client information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend on the scope of the client engagement. We obtain this information from applications and other forms a client may submit to us. It will include information about the client, the client's personal finances and information about transactions between the client and third parties.
- For unaffiliated third parties that require access to personal client information, including financial service companies, brokerage firms, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- We do not provide personally identifiable client information to mailing list vendors or solicitors for any purpose.
- Personally identifiable client information will be maintained during the time the individual or entity is a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of retention, all such information will be destroyed.

The firm will provide the current privacy policy notice to clients before or concurrent with their establishing a relationship as a client.

Jeffrey Vieth
Buffalo Capital Corporation
4299 MacArthur Blvd
Suite 100
Newport Beach, CA 92660
(949) 476-2799
www.BuffaloCapital.com

**Form ADV Part 2B
Brochure Supplement**

March 21, 2018

This brochure supplement provides information about Jeffrey Vieth that supplements the Buffalo Capital Corporation brochure. You should have received a copy of that brochure. Please contact Jeffrey Vieth if you did not receive Buffalo Capital Corporation's brochure or if you have any questions about the contents of this supplement.

Additional information about Jeffrey Vieth is available on the SEC's website at www.adviserinfo.sec.gov.

Form ADV Part 2B - Brochure Supplements

Education and Business Standards

Principal executive officers, management persons and individuals important to the firm's investment strategies are required to have a college degree and experience demonstrating the ability to handle the required duties.

The CEO of Buffalo Capital has earned a CFP certification and credential that is required to be explained further in detail as follows:

CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10 hours CFP® Certification Exam.
- Three year qualifying full time work experience.
- Successfully pass the Candidate Fitness Standards and background check.
- Ethics- Agree to be bound by CFP Board's Standards of Professional Conduct.

Certified Financial Planner (CFP®): Certified Financial Planners are licensed by the CFP Board to use the CFP mark.

Jeffrey Vieth, CFP®

Birthdate: 8/17/1943

Education: San Jose State College, San Jose, CA
Bachelor of Arts, History - 1965

University of California, Los Angeles, CA
Master Business Administration - 1968

College for Financial Planning
Certified Financial Planner -“CFP®” - 1979

Member: Financial Planning Association (FPA)
National Association of Active Investment Managers (NAAIM)

Business Background:

Buffalo Capital Corporation – CEO & Founder	1/81 to Present
Titan Value Equities Group, Inc. – Registered Principal	4/83 to 9/96
The Vieth Company – President	2/78 to Present
California Insurance License #0446429	9/72 to Present

Disciplinary Information

Jeffrey Vieth, CFP® has no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of this advisory business.

Other Business Activities

Jeffrey Vieth, CEO of Buffalo Capital, has held a State of California Life and Health Insurance license since 1972. Mr. Vieth receives commissions from various insurance companies and agencies for insurance products purchased by individuals. These individuals on a rare occasion may also be clients of Buffalo Capital. These insurance products are neither securities nor investment products and are unrelated to the business activities of Buffalo Capital.

Mr. Vieth is also President and owner of The Vieth Company, DBA Swiss Reserve Corporation of America, a California Corporation, which provides contract office services to individuals and small companies.

Mr. Vieth spends more than 95% of his time committed to business activities on the business of Buffalo Capital.

Additional Compensation

Mr. Vieth receives commissions from various insurance companies and agencies for insurance products purchased by individuals. See other business activities above.

Supervision

Jeffrey Vieth, CFP® is the Chief Executive Officer and Chief Compliance Officer of Buffalo Capital and is the supervising authority.

Requirements for State-Registered Advisors

Not applicable

Kurt Beimfohr
Buffalo Capital Corporation
4299 MacArthur Blvd
Suite 100
Newport Beach, CA 92660
(949) 476-2799
www.BuffaloCapital.com

**Form ADV Part 2B
Brochure Supplement**

March 21, 2017

This brochure supplement provides information about Kurt Beimfohr that supplements the Buffalo Capital Corporation brochure. You should have received a copy of that brochure. Please contact Jeffrey Vieth if you did not receive Buffalo Capital Corporation's brochure or if you have any questions about the contents of this supplement.

Additional information about Kurt Beimfohr is available on the SEC's website at www.adviserinfo.sec.gov.

Form ADV Part 2B - Brochure Supplements

Education and Business Standards

Principal executive officers, management persons and individuals important to the firm's investment strategies are required to have a college degree and/or experience demonstrating the ability to handle the required duties.

Kurt Beimfohr

Birthdate: 1/27/1981

Education: Claremont McKenna College, Claremont, CA
Bachelor of Arts, Economics - 2003

University of Virginia Darden School of Business, Charlottesville, VA
Master Business Administration - 2010

Business Background:

Buffalo Capital Corporation – President	11/11 to Present
Gurtin Fixed Income Management – Portfolio Management Associate	6/10 to 9/11
Pacific Investment Management Company (PIMCO) - Trade Operations	10/03 to 4/08

Disciplinary Information

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

Other Business Activities

None

Additional Compensation

Kurt Beimfohr receives no additional compensation related to outside business activities.

Supervision

Kurt Beimfohr is supervised by the Chief Executive Officer and Chief Compliance Officer.

Requirements for State-Registered Advisors

Not applicable