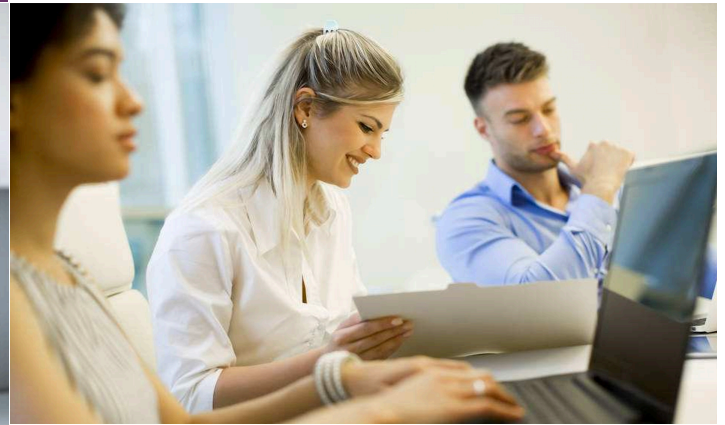
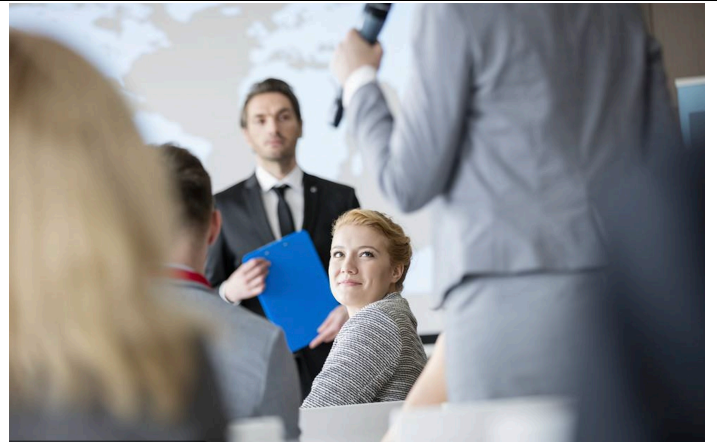


Palm Springs Advisory



Palm Springs Advisory LLC Firm Brochure – Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Palm Springs Advisory. If you have any questions about the contents of this brochure, please contact us at 008613467529666 and/or zhangleioo31@hotmail.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. Registration does not imply a certain level of skill or training.

Additional information about Palm Springs Advisory also is available on the SEC's website at www.adviserinfo.sec.gov. Palm Springs Advisory LLC's CRD number is: 290775.

Version Date: September 18, 2019

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China 100027

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Material Changes

Palm Springs Advisory believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide its clients with complete and accurate information at all times. Palm Springs Advisory encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with us.

Material Changes

- The name of our company has changed from Magic Mind LLC Advisors LLC to Palm Springs Advisory LLC
- The

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1. Advisory Business

a) Description of the Advisory Firm

Palm Springs Advisory LLC (hereinafter "Palm Springs Advisory") was founded as a Delaware Limited Liability Company in 2017 and 100% employee owned. Palm Springs Advisory devotes its resources primarily to the service of high net worth individuals and foreigner (non-US resident) investors. Palm Springs Advisory provides equity, fixed income, balanced and international equity investment strategies for a variety of client accounts. Palm Springs Advisory especially focusing on get rid of the technology revolution, to searching investment opportunity that could benefit clients in long term.

b) Services Provided

Palm Springs Advisory offers three types of portfolio management services, and will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

Palm Springs Advisory evaluates (either through face-to-face interview or internet questionnaire filling) the current investments of each client with respect to their risk tolerance levels and time horizon. All the above clients personal, financial and investment preference information are documented in the Investment Policy Statement, which is given to each client.

According to the client's individual goals, objectives, time horizon, and risk tolerance, Palm Springs Advisory offers one of the following portfolio management services:

- i. Periodical Income Portfolio Management Services: discretionally manage client's portfolio to meet their periodically financial needs.

- ii. Standard Portfolio Management Services: Palm Springs Advisory offers the same suite of services to all of its clients, who choosing this type of service. Investment will be more focusing on large capitalization firm. This service offers only to high net worth individuals, qualified clients or Non-US resident clients.
- iii. Premium Portfolio Management Services: Customize clients account to form a portfolio to meet his goals, objectives, time horizon, and risk tolerance. This service offers only to high net worth individuals, qualified clients or Non-US resident clients.

Portfolio management services include, but are not limited to, the following:

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

Palm Springs Advisory seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Palm Springs Advisory' economic, investment or other financial interests. To meet its fiduciary obligations, Palm Springs Advisory attempt to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Palm Springs Advisory' policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Palm Springs Advisory' policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, among its clients on a fair and equitable basis over time.

Palm Springs Advisory Capital primarily recommends equities to a majority of its clients. Palm Springs Advisory Capital may use other securities as well to help diversify a portfolio when applicable.

c) Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees.

Palm Springs Advisory does not participate in any wrap fee programs.

2. Fees and Compensation

According to the different services that client chooses, Palm Springs Advisory implement different types of fee schedules respectively.

a. Periodical Income Portfolio Management Fees

Palm Springs Advisory applies 2% of the management fee to those clients who choose Periodical Income Portfolio Management Services. For detailed explanation of the method in calculating fees, please find in section 2 (d).

b. Standard Portfolio Management Performance-Based Fees

High net worth clients, qualified clients or Non-US resident clients will be applied a 20% performance fee based on capital appreciation and 0.8% to 1.8% of the management fee based on the investment size, if Standard Portfolio Management Service is chosen. For detailed explanation of the method in calculating fees, please find in section 2 (d) and 2 (e).

These fees are generally negotiable and the final fee schedule is attached to the Investment Advisory Contract. This service may be canceled immediately upon written notice. Clients must pay the prorate performance-based fees for the billing period in which they terminate the Investment Advisory Contract up to and including the day of termination.

c. Premium Portfolio Management Performance-Based Fees

High net worth clients, qualified clients or Non-US resident clients will be applied a 35% performance fee based on capital appreciation and 1.0% to 2% of the management fee based on the investment size, if Premium Portfolio Management Service is chosen. For detailed explanation of the method in calculating fees, please find in section 2 (d) and 2 (e).

These fees are generally negotiable and the final fee schedule is attached to the Investment Advisory Contract. This service may be canceled immediately upon written notice. Clients must pay the prorate performance-based fees for the billing period in which they terminate the Investment Advisory Contract up to and including the day of termination.

d. Management Fee Explanation

The management fee applied to all clients of Palm Springs Advisory despite what services clients choose. The management fee is charged a blended rate based on five ranges of client's Net Asset Value (NAV). The total blended rate is the sum of the fee amount for each range up to the client's current NAV, and it applied monthly.

Net Asset Value Range	Standard Portfolio Management Service Fee	Premium Portfolio Management Service Fee
0-50,000	1.8%	2%
50,000.01-100,000	1.4%	1.6%
100,000.01-500,000	1.2%	1.4%
500,000.01-1,000,000	1.0%	1.2%
1,000,000-Onwards	0.8%	1.0%

e. Performance – Based Fee Explanation

The performance – based fee is applied as a percentage of quarterly profit and loss at the end of each quarter (as of 3/31, 6/30, 9/30, 12/31). And high water marking method is used to offset periods of losses in a volatile market. High Water Marking keeps track of cumulative losses per billing period within a four quarters look-back period. A loss in any period will be added to the look-back period's cumulative losses. A gain in any period will decrease the

cumulative loss recorded to date. Palm Springs Advisory will not charge a profit-based fee as long as a cumulative loss exists.

f. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Palm Springs Advisory.

g. Other fees

There are some other fees will generate during the time Palm Springs Advisory trading for clients. Please be noticed that those fees are not charged by Palm Springs Advisory, and fees will deduct automatically from each individual client account when processing the trading.

h. Prepayment of Fees

Palm Springs Advisory collect its fees in arrears. It does not collect fees in advance.

i. Outside Compensation for the Sale of Securities to Clients

Neither Palm Springs Advisory nor its supervised persons accept any compensation for the sale of securities or other investment products.

3. Performance-Based Fees and Side-By-Side Management

Palm Springs Advisory manages accounts that are billed on performance-based fees (a share of capital gains on or capital appreciation of the assets of a client) and may as well manage accounts that are not billed on performance-based fees. Managing both kinds of accounts at

the same time presents a conflict of interest because Palm Springs Advisory and/or its supervised persons have an incentive to favor accounts for which Palm Springs Advisory receives a performance-based fee. Palm Springs Advisory addresses the conflicts by ensuring that clients are not systematically advantaged or disadvantaged due to the presence or absence of performance-based fees. Palm Springs Advisory seeks best execution and upholds its fiduciary duty for all clients. Clients paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

4. Types of Clients

Palm Springs Advisory generally provides advisory services to the following types of clients:

- a. High net worth clients: Clients with at least \$750,000 under management with the adviser or more than \$1,500,000 of net worth
- b. Qualified Purchasers: Clients who are “qualified purchasers” under section 2(a) (51) (A) of the Investment Company Act;
- c. Clients that are not U.S. Residents.

The minimum account balance for all types of clients is \$10,000.

5. Methods of Analysis, Investment Strategies and Risk of Loss

- a. Methods of Analysis and Investment Strategies

Methods of Analysis

Palm Springs Advisory' methods of analysis include Fundamental analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Investment Strategies

Palm Springs Advisory uses long term trading as the main investment strategies. Covered option may be used in some situation to hedge potential risk of particular security.

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

b. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

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

c. Risks of Specific Securities Utilized

The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of

transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve

risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Non-U.S. securities - present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

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

6. 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 (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

7. Other Financial Industry Activities and Affiliations

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

Neither Palm Springs Advisory nor its representatives are registered as, or have pending applications to become, a broker/dealer or representative of a broker/dealer.

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

Neither Palm Springs Advisory nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

Lei Zhang acts as Chief Operating Officer of BBAE Holdings Limited, which is the parent company of BBAE Advisors LLC, a SEC registered Investment Advisor. While, Lei Zhang is not involved to give investment advice to clients in BBAE and don't register as an investment representative in BBAE. Palm Springs Advisory always acts in the best interest of the client, and clients are in no way required to utilize the services of any representative of Palm Springs Advisory in connection with such individual's activities outside of Palm Springs Advisory.

All material conflicts of interest are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonable expected to impair the rendering of unbiased and objective advice.

d. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Palm Springs Advisory does not utilize nor select third-party investment advisers. All assets are managed by Palm Springs Advisory.

8. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

a. Code of Ethics

Palm Springs Advisory has 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, Recordkeeping, Annual Review, and Sanctions. Palm Springs Advisory' Code of Ethics is available free upon request to any client or prospective client.

b. Recommendations Involving Material Financial Interests

Palm Springs Advisory and its associated persons may have material financial interests in issuers of securities that Palm Springs Advisory may recommend for purchase or sale by clients.

This presents a conflict of interest in that Palm Springs Advisory or its related persons may receive more compensation from investment in a security in which Palm Springs Advisory or a related person has a material financial interest than from other investments. Client approval will be sought for client investment in such recommendations and, if granted, such

approval will be binding. Palm Springs Advisory always acts in the best interest of the client consistent with its fiduciary duties and clients are not required invest in such investments if they do not wish to do so.

c. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Palm Springs Advisory may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Palm Springs Advisory to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Palm Springs Advisory will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

d. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Palm Springs Advisory may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Palm Springs Advisory to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Palm Springs Advisory will never engage in trading that operates to the client's disadvantage if representatives of Palm Springs Advisory buy or sell securities at or around the same time as clients.

9. Brokerage Practices

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

Custodians/broker dealers will be recommended based on Palm Springs Advisory's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Palm Springs Advisory may also consider the market expertise and research access provided by the broker dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Palm Springs Advisory' research efforts. Palm Springs Advisory will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker dealer/custodian.

Palm Springs Advisory recommends Interactive Brokers LLC.

1. Research and Other Soft - Dollar Benefits

While Palm Springs Advisory has no formal soft dollars program in which soft dollars are used to pay for third party services, Palm Springs Advisory may receive research, products, or other services from custodians and broker dealers in connection with client securities transactions ("soft dollar benefits"). Palm Springs Advisory may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Palm Springs Advisory does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Palm

Springs Advisory benefits by not having to produce or pay for the research, products or services, and Palm Springs Advisory will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that Palm Springs Advisory' acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

Palm Springs Advisory 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

Palm Springs Advisory does not permit clients to direct it to execute transactions through a specified broker dealer.

4. Aggregating (Block) Trading for Multiple Client Accounts

Palm Springs Advisory does not involve in aggregating (block) trading for multiple client accounts. All trading involves will be execute in each client's account only.

10. Review of Accounts

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

All Client accounts for Palm Springs Advisory' advisory services provided on an ongoing basis are reviewed at least monthly by our Investment Strategy Team, with regard to clients' respective investment policies and risk tolerance levels. All accounts at Palm Springs Advisory are assigned to this reviewer.

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 of Palm Springs Advisory's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees.

Electronic real-time report is always reachable at the website of the custodian.

11. Clients Referrals and Other Compensation

a. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Palm Springs Advisory may accept compensation for client referrals, but does not have any such arrangements in place at this time. Palm Springs Advisory will fully disclose to clients the details of any referral relationships.

d. Compensation to Non-Advisory Personnel for Client Referrals

Palm Springs Advisory may compensate any person who is not advisory personnel for client referrals, but does not have any such arrangements in place at this time. Palm Springs Advisory will fully disclose to clients the details of any referral relationships.

12. Custody

When advisory fees are deducted directly from client accounts at client's custodian, Palm Springs Advisory will be deemed to have limited custody of client's assets. Because client fees will be withdrawn directly from client accounts, Palm Springs Advisory will:

(A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.

(B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.

(C) Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from custodian with those they received from Palm Springs Advisory.

13. Investment Discretion

Palm Springs Advisory provides discretionary portfolio management services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Palm Springs Advisory generally manages the client's account and

makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. Clients with discretionary accounts will execute a limited power of attorney to evidence discretionary authority.

Palm Springs Advisory will also have discretionary authority to determine the broker dealer to be used for a purchase or sale of securities for a client's account.

14. Voting Client Securities

Palm Springs Advisory acknowledges its fiduciary obligation to vote proxies on behalf of those clients that have delegated to it, or for which it is deemed to have, proxy voting authority. Palm Springs Advisory will vote proxies on behalf of a client solely in the best interest of the relevant client and has established general guidelines for voting proxies. Palm Springs Advisory may also abstain from voting if, based on factors such as expense or difficulty of exercise, it determines that a client's interests are better served by abstaining. Further, because proxy proposals and individual company facts and circumstances may vary, Palm Springs Advisory may vote in a manner that is contrary to the general guidelines if it believes that doing so would be in a client's best interest to do so. If a proxy proposal presents a conflict of interest between Palm Springs Advisory and a client, then Palm Springs Advisory will disclose the conflict of interest to the client prior to the proxy vote and, if participating in the vote, will vote in accordance with the client's wishes.

Clients may obtain a complete copy of the proxy voting policies and procedures by contacting Palm Springs Advisory in writing and requesting such information. Each client may also request, by contacting Palm Springs Advisory in writing, information concerning

the manner in which proxy votes have been cast with respect to portfolio securities held by the relevant client during the prior annual period.

15. Financial Information

a. Balance Sheet

Palm Springs Advisory neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

Neither Palm Springs Advisory nor its management has any financial condition that is likely to reasonably impair Palm Springs Advisory's ability to meet contractual commitments to clients.

c. Bankruptcy Petition in Previous Ten Years

Palm Springs Advisory has not been the subject of a bankruptcy petition in the last ten years.