

ERVIN INVESTMENT MANAGEMENT, LLC

Registered Investment Advisor

FORM ADV PART 2A BROCHURE, ITEM 1: COVER

May 24, 2019

Ervin Investment Management, LLC
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Seattle, WA 98115
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This brochure provides information about the qualifications and business practices of Ervin Investment Management, LLC. If you have any questions about the contents of this brochure, please contact us at 206-495-9957 or by email (john@ervins.net). We are happy to provide copies of this brochure, which you may request by phone or email. 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 Ervin Investment Management, LLC. is available on the SEC's website at www.adviserinfo.sec.gov.

Ervin Investment Management, LLC. is a registered investment advisor. Registration of an investment advisor does not imply a certain level of skill or training.

ITEM 2: MATERIAL CHANGES

This update of Ervin Investment Management's brochure contains the latest information on the firm's assets under management to complete our firm succession from Reis Investment Management.

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ITEM 4: ADVISORY BUSINESS

Ervin Investment Management, is owned by John and Daniel Ervin. The firm first registered with the SEC in 2019. We manage investments for individuals, families, trusts, small pension funds, and charitable foundations. Client assets are generally held in brokerage accounts; most of the assets are held at TD Ameritrade. We don't ever hold client assets ourselves. Clients ordinarily give us a limited power-of-attorney to execute transactions on their behalf. Everyone for whom we manage investments receives trade confirmations and monthly account statements directly from the custodian (the broker which has custody of client assets).

See Item 8, below, for a more detailed description of our investing approach.

As of 5/24/19, Ervin Investment Management manages approximately \$119,000,000.

ITEM 5: FEES AND COMPENSATION

Management fees are based on the value of assets subject to fees at the beginning of each quarter with clients paying quarterly.

We generally debit fees from client accounts, although clients may elect to pay by check. We always send clients an invoice before fees are debited. Clients may elect to change payment methods at any time. For most clients and for us, it is more convenient to have fees debited directly from accounts.

Management fees generally apply to all assets in all accounts, although we occasionally make exceptions for assets managed by clients, cash held in accounts, and for other unique reasons. Fees follow a simple schedule: 0.3% of the first \$5,000,000; 0.2% of the next \$5,000,000; and 0.1% of remaining assets annually.

We receive no compensation, in any form, other than these management fees, with the exception of consulting services occasionally offered to clients on an hourly basis. The broker who has custody of client assets charges commissions for trades and occasionally charges modest fees for other sorts of transactions, examples of which may be charges for providing checkbooks and overnighting checks or documents. We often are able to obtain lower fees or have fees waived on behalf of clients.

We infrequently offer consulting services to clients for whom we don't manage investments ordinarily, typically at the rate of \$250/hr.

When we determine that positions in an ETF (exchange traded fund) or mutual fund are in clients' best interest, we may establish a position in a fund. You should know that funds charge management fees. If you hold mutual funds and they are part of the portfolio for which we charge fees, you will be paying fees to the mutual fund company and to us.

Your investment returns will be a function of the performance of the securities held in your accounts, less any transaction costs (primarily commissions charged by the broker), fees (primarily our management fees and any fees charged by the funds you hold), and, for taxable accounts, the taxes you have to pay on interest and dividend income and, when a security is sold for a profit, on capital gains (which aren't offset by losses you may have from other transactions).

We think you should pay serious attention to risk (more about this later) and performance, over reasonable time periods, and should minimize investment expenses. We will discuss this with you. You might measure how we do vs. another manager, a broker, a few mutual funds, or a low cost index fund.

Although we expect that you'll regularly monitor accounts we manage for you, we also encourage you to read as much as interests you about investing. The more you know, the better able you'll be to assess our management style and performance. See Item 8, below, for more.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We use the same fee structure for all clients. Under uncommon circumstances negotiated on an individual basis (e.g. clients holding large cash reserves or smaller accounts for children to learn about investing), assets are occasionally exempted from fees or receive a lower fee, but no assets are subject to performance-based fees. We also do not engage in side-by-side management.

ITEM 7: TYPES OF CLIENTS

We manage assets for individuals, families, trusts, charities, and pension funds.

ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

Investing in securities involves risk of loss that clients should be prepared to bear. We try to maximize risk-adjusted returns. In other words, we try to earn substantial returns without taking significant risk (see below). Stock markets are always somewhat volatile; recently, they've been extremely volatile. While stocks tend to outperform other financial assets over longer time periods, short-term performance is variable. Every family investing in stocks should have sufficient cash flow and cash and short-term fixed income (for instance, CDs, money market funds, bank accounts) to meet short-term cash requirements. Cash flow may include your wages, pensions, annuity payments (such as social security), interest and dividends from bonds and stocks, etc. While we'll be happy to help you find alternatives for short-term savings; we've no interest in buying stocks with cash you'll likely need in the next couple of years.

We differentiate between volatility and risk. Volatile markets actually provide us with opportunities to buy securities for lower prices or sell them for higher prices. We think of risk as the probability of permanently losing capital. Volatility is inevitable; we try to minimize risk. Nevertheless, when you buy stocks you can lose money. Money which you are likely to need over the next couple of years shouldn't be invested in stocks. Stocks are riskier than short-term debt securities (CDs, for instance or money funds) over short time periods. We think that a reasonably diversified portfolio of stocks – shares of solid companies, with good managements, bought at favorable prices—is less risky than cash or CDs over medium and longer time periods (three-to-five years or longer). We also believe that low-fee funds, particularly index funds, can form the core of such a portfolio.

Although we're not enamored with the term, our approach to investing is frequently referred to as "value investing". As far as we're concerned, all investing should be value investing. Buying or selling securities without regard to value is speculation. We try to buy shares of the best companies we can find, for prices which are significantly less than they are worth.

In addition to investing in stocks of individual companies, we also sometimes recommend that clients hold a portion of their portfolio in low-cost index funds and very occasionally in low-cost active funds. The use of these funds allows clients to diversify broadly in ways that are difficult to accomplish when investing in a

small number of individual securities. Because the use of these funds is less complex and less time intensive than investments in individual companies, their use also helps to minimize fees and to enable us to spend time on other aspects of investment advising.

The art, for an investor, is recognizing “noise”; information is ubiquitous and voluminous. We do our best to sort through what’s available and concentrate on information which helps us better invest our clients’ (and our personal) assets. Much of what we read is related to our current holdings or securities we’re considering owning. Some of the reading we’ve found most valuable adds to our fundamental understanding and knowledge, whether or not it has immediate utility regarding current investments. John’s first grad school mentor referred to this (broad knowledge base) as apperceptive mass. We’re incredibly curious; we’re passionate about investing. One reason we don’t market our investment advisory operation, aside from our general distaste for this sort of thing, is that it takes time away from thinking, studying, and attending to our investments.

ITEM 9: DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Ervin Investment Management or the integrity of our management. Neither our advisory business nor John Ervin or Daniel Ervin has any history of civil or criminal “events.” We have not been subject to any ethics investigations.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We have no other financial industry activities or affiliations. We are not stock brokers; we have no affiliations with stock brokers, insurance companies, or other financial institutions.

Neither Ervin Investment Management nor any investment advisor representative at the firm accepts compensation for referrals in any form. The only compensation we receive is from clients and is for managing investments (see Items 5 and 6, above). We don’t accept commissions. We may make referrals to other financial professionals, with whose work we are familiar, but do not receive any compensation or other consideration for doing so.

ITEM 11: CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Ervin Investment Management has adopted a Code of Ethics for all employees, including management. Our written Code of Ethics requires that all employees review applicable federal rules and regulations. We are happy to provide you with a copy of these rules and a copy of our ethics policy. Here are the first three paragraphs of our one-page Code of Ethics:

We will act honorably and ethically and operate, to the best of our abilities, in our clients’ best interests. We will try to manage clients’ assets as we would want our assets managed. Our mistakes will be honest ones and we will do what we can to minimize them and resolve them in clients’ favor.

We don’t have any inside information and don’t anticipate having any. If we obtain any, we won’t act on it.

When we identify any areas where our interests are in conflict with clients’ we will do whatever we can to minimize the conflicts and see that your interests come first and are protected.

When you work with us, you (generally) give us a limited power of attorney, which permits us to make transactions on your behalf. We don't take possession of client assets; the custodian which actually holds securities, on your behalf, will usually be a broker and may be a bank or you might hold a security yourself. When you make a deposit in your brokerage account, you write a check to a broker, not to us. The only payment we ever get is for our management fees.

While we may own some equities different from client positions due to our circumstances, we generally own the same securities as our clients. Client accounts are never "aggregated" or pooled. Your accounts are yours. We frequently buy or sell securities in a bulk account. We do this for several reasons. It is more efficient for us; we can put in orders to buy or sell at various prices, during the day. When we have finished trading, we allocate trades to client accounts. When we trade, we often place orders at various prices (lower than market prices, when we are buying or higher, when we are selling). For this reason, we can't allocate trades until all have filled or the market has closed. With rare exceptions (see below) every client who buys or sells a stock on a certain day does so at the same price. This price is the average price we paid or received when we bought or sold in our bulk account. Nobody pays commissions for these "bulk" trades. Commissions are charged by the broker when a trade is allocated to a specific account. John Reis, John Ervin, and Daniel Ervin are the only people (except, of course, you) authorized to execute transactions for clients.

John and Linda (who own the investment advisory business) and our family and employees generally own the same securities. When transactions are allocated, we make every effort to make sure that nobody, including us (our family) receives preferential treatment. There are opportunities, because we own the same stocks and usually make trades in a bulk account, to allocate trades unfairly. We don't do this.

Most of the securities we own are fairly large companies. Our trades don't, generally, affect market prices. Were we to buy or sell a smaller, less frequently traded security, where there was the potential for our transactions to change a market price, we could, theoretically, buy or sell for personal accounts or for some clients before others, favoring ourselves or certain clients over other clients. We don't do this.

All transactions in all securities for John Reis, his family (those for whom we manage investments), and our employees are reviewed so that we can insure that clients are never placed in a disadvantaged position.

Most of our clients are family, friends, colleagues, or friends of friends or colleagues. We all get the same treatment. Trade allocations and family holdings may vary as a function of portfolio allocations, tax considerations, cash flow needs, restrictions placed by clients on securities they wish to hold, or other variables. We regularly monitor performance and have found that, over reasonable time periods (quarters or years), accounts holding the same securities have performed about the same. In other words, the returns generated by the stock portions of accounts (or portfolios for families with multiple accounts) are roughly equal, after accounting for stock/fixed income/cash allocations, cash flows into or out of accounts, tax considerations, and so on.

If you'd like a copy of our code of ethics, let us know and we'll send it to you.

We don't buy directly from clients or sell directly to them. We don't facilitate cross trades (direct transactions which don't go through a stock market or market maker) between clients or with our employees. There may be circumstances when one client will buy a stock or bond which another wishes to sell. An example might be that one family needed to raise cash at the same time another family wished to increase their investment in stocks/bonds. Although this isn't frequent, were we to buy a security for one client and sell the same one for another, on the same day, the trades would be made through a broker, on a market, would not be private, and would be available for review.

When you work with us, you should understand our process and our policies. We are subject to a raft of laws and regulations. What we do is subject to review by regulators. All of this notwithstanding, when you ask us to manage investments for you, you are relying on our skill, judgment, and integrity. Laws and regulations generally establish minimum, acceptable standards. Regulators do the best they can, with limited resources, to protect the public. Our regulators have the right, without a court order, to examine not only our books and records, but records we keep for financial clients (account statements, contracts, our correspondence, invoices, and so on). This is necessary for them to do their job.

ITEM 12 – BROKERAGE PRACTICES

We choose a broker or brokers for several reasons, which are intended to benefit clients. Assets held in brokerage accounts need to be secure. Although holdings vary in value as a function of market variation (over short time periods) and as a function of our investment ability (over longer time periods) any broker we choose will provide secure custodial services. We want good execution when we place a trade (the best price available, on any exchange or from any market maker at the time we make a trade), low commissions and other costs, and also want clients to be able to access their accounts and do the sorts of transactions we'd ordinarily do for them, should there be a need to do so or should a client wish to do so, independent of our firm. Although you give us a limited authority to buy or sell securities on your behalf, we don't ever take possession of your assets. Your assets will generally be held in a brokerage account and you will get statements from the broker every time we do any transaction (confirmations) and will receive monthly statements and tax documents directly from the broker.

We don't have any "soft dollar" arrangements with anyone or with any institution. These are forms of compensation which aren't actual cash but might include research or computers or other benefits, offered in exchange for directing business to a broker. We don't think this sort of thing is proper and we don't do it. We pay for our own research (our money, not yours) and buy our own computers and office supplies.

We do have access to research made available to all advisors (and, as far as we know, to all clients) by brokers. We make most of our trades online, using trading platforms provided to advisors by brokers. When we meet representatives of brokers, for lunch, we pay our own way, pick up the entire tab ourselves, or take turns. We're not for sale.

We engage in buying and selling equities through bulk trades. This allows us to manage multiple accounts efficiently. When we do this, we place large orders and allocate the portion that fills among accounts. When we place bulk orders, we plan allocation of filled transactions prior to executing the order to ensure that all clients receive their fair share of these transactions.

Most of the assets we manage are held at TD Ameritrade. [TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member.] Because our clients hold significant assets at Ameritrade and because we've known and worked with many of their supervisory staff and senior management for a very long time, we believe that we have a better chance to negotiate fees (some of them) and costs (some of them) and effectively advocate on behalf of our clients when most of the assets we invest are held at Ameritrade. While we've no reason to believe that comparable options don't exist at other brokers, we know many of the policy makers at Ameritrade. We can and do pick up a phone and get in touch with senior managers on a regular basis. While it is hard to quantify the value this adds for clients, we believe it is significant. Were this to not be the case, we would be very willing to recommend that client assets be held through another broker. Should the relationships we have with senior management at TD Ameritrade (institutional) and/or the trade executions

we get, fees clients pay, and other variables affecting your investment returns, no longer make TD Ameritrade the most desirable alternative as custodian for client assets, we would be very willing to recommend other brokers.

Despite the advantages we've described above, which we believe benefit all of us, we've found occasional circumstances in which a particular client's interests were best served by having their assets held at another broker. In these circumstances we are happy to accommodate clients' needs to maintain accounts, for which we are responsible, at other brokers.

ITEM 13 – REVIEW OF ACCOUNTS

We know our clients. We're accessible and expect clients to get in touch with us by phone, email, or in person whenever they have questions or want or need anything related to their investments. We review accounts, on an informal basis, on a daily or weekly basis. When we send an invoice on a quarterly basis, we generally review recent portfolio performance. We also write regular letters providing a summary of how we're doing in general and offering our assessment of macroeconomic events and some of our specific investments. These letters don't provide specific performance data for each client.

While we will, periodically, send you written summaries of your performance, allocation, and other variables related to your portfolios, we are capable of producing a variety of reports any time they are relevant. We regularly review issues related to taxes (e.g. capital gains and realizing capital losses appropriately). Please let us know if you or your accountants or estate attorneys ever need or want any data we can provide about performance, holdings, fees, gains and losses, and so on. We'll provide you with whatever we anticipate would be useful and are happy to send you anything else we have or can produce.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

Whenever we make referrals of any sort, for instance, to an accountant or attorney, we refer to people we know; these are usually individuals with whom we have worked and whom we respect. Our only consideration is what would benefit a client. We've never paid anyone (money or anything else) or received any compensation (money or anything else) for referrals. We've not received, to our knowledge, nor would we accept, any special favors for making referrals of any sort. We expect people to refer to us when they think highly of our work, our expertise, or for other reasons related to our talent and competency. These are the criteria we use when we refer to others.

ITEM 15 – CUSTODY

Ervin Investment Management doesn't have custody of client assets. This means that, while you will likely give us permission to execute transactions on your behalf, the custodian for your assets (the folks who actually hold your cash and securities) will most likely be a broker. You will receive monthly statements and trade confirmations directly from the broker. We encourage and expect you to review these monthly statements. The first pages are particularly valuable to review, containing statements that summarize the value of your account, last month's value, the general composition of your account (stocks, bonds, money market funds, mutual funds, if any, and so on), and deposits and withdrawals that have taken place.

Although you may wish to review your accounts more frequently, we think it is important that you review them at least every month. You should understand what you see and should ask us for a hand if anything doesn't make complete sense.

Reports you get from us will generally be completely consistent with those you get from the broker. Small differences will likely be a function of trades made during the last few days of a month not having “settled” by month-end. Settlement is the term used for the actual receipt of cash in your account, after something has been sold (or a bond has matured) or the payment, from your account, when something has been bought. When we make a transaction for you, you immediately own (or have sold) a security. You actually receive payment or make payment two business days later (usually; sometimes it is on the next day), at which time sales proceeds are deposited in your account or funds used to buy a security are debited from your account.

Our fees are based on account values reported on the monthly statements you receive. We’ve found that slight discrepancies, which are usually a function of trades not having settled, vary on a random basis. Using brokerage statements as a basis for management fees is easy for us and makes it easy for you to reconcile our invoices with what you get from the broker.

Whether you choose to pay our fees by check or by having us direct the broker to debit your account for a fee, we will always send you an invoice first. Please read invoices we send you; they should be simple and clear. Let us know if anything you see doesn’t make sense. We will explain anything which you don’t fully understand. You should expect us to make informed decisions about our investments and to monitor your accounts and brokers who have custody of your assets. There will be some areas of shared responsibility. Either you or a knowledgeable family member should review our work and our fees.

ITEM 16 – INVESTMENT DISCRETION

Clients generally give us authority to make transactions on their behalf. This is done by means of a limited power of attorney, which is usually included as part of an account application. When you give us this limited authority, you continue to have full authority to make transactions in your own account. You may wish to designate specific securities or types of securities you do not want to own. We will respect these limitations. In rare circumstances, when broad and substantial investment restrictions would hinder our ability to effectively manage your portfolios, we’ll let you know. We will be happy to discuss alternatives to our managing your investments. We will discuss allocations, your preferences, our style, and so on and we will consult with you about all of these decisions. You will make the final decision about all of these issues.

Your needs and preferences may change. Please let us know your preferences and requirements. We are happy to discuss any of this with you. While we often have opinions and are never shy about expressing them, should you and we disagree about any investment decisions, we will defer to you. It is your money. If you require anything which we don’t think we can effectively do, we’ll let you know and help you explore alternatives.

We expect you to regularly review your account holdings. Very infrequently we have inadvertently bought a security for a client which they’ve asked us not to buy. If we find we’ve made an error we’ll correct it and let you know. If you find we’ve made an error, let us know and we’ll correct it. If our error resulted in a profit for you, you’ll keep the profit; if we mistakenly buy something for you, which you’ve requested we not buy, we’ll sell it and reimburse you for any investment losses resulting from our error.

ITEM 17 – VOTING CLIENT SECURITIES

We don’t vote client proxies. Some clients, who do not want to receive proxies or other reports from companies elect to complete a form with the broker which directs this material to our office. We are happy to accommodate clients who wish to reduce their paperwork. We won’t, however, vote your proxies. If you want to receive all of them (and other reports from companies), some of which may be interesting and

informative, we encourage you to not submit the form requesting that this material be sent to our office. If you request that this paperwork be sent to our office and if we ever believe that it is in your interest to vote your proxies—we don't expect this to happen—we'll let you know and see that you get copies of the proxies which you can sign and submit.

If you change your mind (and want to have proxies sent directly to you) you can immediately rescind your previous instructions. Let us know or call the broker.

You will periodically receive information from a company, broker, transfer agent, or other financial institution. If you receive anything you don't fully understand, let us know. We'll explain it, review it and let you know our thoughts, or offer guidance about where you (or we, on your behalf) might find information about anything you receive.

ITEM 18 – FINANCIAL INFORMATION

Registered investment advisers are required to provide you with certain financial information and disclosures about their financial condition, if the advisor has custody of client assets or has discretionary authority or requires or solicits prepayments of more than \$1,200 (\$500 for state-registered advisors) per client, six months or more in advance, or if the advisor's financial condition would reasonably impair their ability to meet contractual commitments to clients.

We don't require or solicit or accept prepayments six months or more in advance. We don't accept custody of client assets. We do have discretionary authority for most clients. There is nothing about our financial condition which would impair our ability to meet our contractual commitments.

PART 2B: BROCHURE SUPPLEMENT – JOHN ERVIN

ITEM 1: COVER PAGE

Brochure Supplement for:

John Ervin
1037 NE 65th St #359
Seattle, WA 98115
(206)495-9957

This brochure supplement provides information about John Ervin. Please contact John if you have any questions about the contents of this supplement.

ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

John Ervin is 35. Here is information about his education and recent business background.

M.A., Curriculum and Instruction, Western Governor's University, 2017
B.A., Spanish and Teaching Certification, Swarthmore College, 2006

John began working professionally in investing in January, 2018. His prior professional background is outside the world of finance. He has served on a school board in a fiduciary capacity and has managed investments for a trust, but he has not led a career in the financial industry and does not present himself as such.

John has worked in education in various capacities for the last decade. He has been a classroom teacher in grades K-6, worked in science and environmental outreach education, and taught in a variety of different types of schools. Many of the skills involved in this line of work are relevant to the role of investment advising. Of particular note are communication and explanation, both essential for working with clients on investment decisions. John has spent a particularly large portion of his career in teaching data analysis and interpretation. John's academic background has prepared him for the work involved in asset allocation and evaluation of potential investments, but clients should be aware that John does not have a deep history in the financial industry.

ITEM 3: DISCIPLINARY INFORMATION – NONE

John has no history of any civil, criminal, regulatory, or professional (or other) violations. He hasn't been the subject of any ethical or legal or administrative investigation. He has never declared bankruptcy and has not been found liable in, nor has he been a party to, any arbitration proceeding.

ITEM 4: DISCIPLINARY INFORMATION – NONE

ITEM 5: ADDITIONAL COMPENSATION – NONE

ITEM 6: SUPERVISION

John is authorized to effect transactions on behalf of all clients and to provide advice to all clients. As he is the Chief Compliance Officer for Ervin Investment Management, he is solely responsible for conducting himself

properly. Beyond this, all IARs at Ervin Investment Management routinely copy each other on all e-mail communication with clients, discuss complex situations with each other, and double check each other's work.

PART 2B: BROCHURE SUPPLEMENT – DANIEL ERVIN

ITEM 1: COVER PAGE

Brochure Supplement for:

Daniel Ervin
1037 NE 65th St #359
Seattle, WA 98115
(206) 414-2518

This brochure supplement provides information about Daniel Ervin. Please contact Daniel if you have any questions about the contents of this supplement.

ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Daniel Ervin is 36. Here is information about his education and recent business background.

M.A., Educational Leadership and Policy Studies, University of Washington, 2013
Teaching Credential Program, San Francisco State University, 2008 (Currently credentialed in elementary education in California and Washington)
B.A. Magna cum Laude, Music, Carleton College, 2004

Daniel began working professionally in investing in January of 2018 and became an investment adviser representative in March of 2018. With two co-successor trustees, he has managed a portion of a trust since late 2016. The rest of Daniel's work history is largely unrelated to finance, though he did represent faculty members on an independent school board during the 2013-2014 academic year, and many of the issues that came to that body's attention involved budgets, facilities, investments, and other business matters.

Daniel has spent most of his career as an educator. He taught in elementary schools for ten years, collecting a master's degree in educational leadership and policy as well as experiences interning at a district central office, running summer programs, and evaluating independent schools. In addition to his work with Reis Investment Management, Daniel works for a school district as a literacy specialist, in which capacity he delivers professional development, coaches teachers, writes curriculum, and helps develop programs and strategies to support students' learning and growth.

ITEM 3: DISCIPLINARY INFORMATION – NONE

Daniel has no relevant history of any civil, criminal, regulatory, or professional (or other) violations. He hasn't been the subject of any ethical or legal or administrative investigation. He has never declared bankruptcy and has not been found liable in, nor has he been a party to, any arbitration proceeding.

ITEM 4: DISCIPLINARY INFORMATION – NONE

ITEM 5: ADDITIONAL COMPENSATION – NONE

ITEM 6: SUPERVISION

Daniel is authorized to effect transactions on behalf of clients and to provide advice to all clients. John Ervin, available at 206-495-9957 and john@ervins.net, is the Chief Compliance Officer for Ervin Investment Management and supervises Daniel's compliance with our policies and procedures. Beyond this, all IARs at Ervin Investment Management routinely copy each other on all e-mail communication with clients, discuss complex situations with each other, and double check each other's work.

PART 2B: BROCHURE SUPPLEMENT – JOHN REIS

ITEM 1: COVER PAGE

Brochure Supplement for:

John Reis
2683 Via de la Valle, Suite G513
Del Mar, CA 92014
(858)455-5522

This brochure supplement provides information about John Reis that supplements the Ervin Investment Management, LLC. brochure, a copy of which is included in this document. Please contact John Reis if you have any questions about the contents of this supplement.

ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

John Reis is 70. Here is information about his education and recent business background.

Ph.D., Clinical Psychology, California School of Professional Psychology, 1976
M.A., Clinical Psychology, California School of Professional Psychology, 1974
B.A., Psychology, Antioch College, 1970

John has been a licensed psychologist (CA - PSY5524) since 1978. He became an investment advisor in 1994, at which time he began to reduce the size of his psychology practice. He no longer practices psychology, though he occasionally speaks to graduate students and colleagues about gestalt therapy, group therapy, training and supervision, or behavioral economics.

John began investing for himself and his family in 1980. He became a registered investment advisor (sole proprietor) in 1994, at which time he also began managing investments for others. The advisory practice subsequently incorporated and John became its CEO.

John's professional background (psychology) included six years on the clinical faculty (psychiatry) of UCSD Medical School, adjunct faculty positions in several other graduate programs, teaching psychotherapy, and providing pre- and post-doctoral supervision. He has taught several continuing education seminars, about behavioral economics, for the local psychological association. Most of these experiences took place ten or twenty years ago.

John has no formal academic background in economics or finance. Please don't infer from his credentials that he learned anything about investing in grad school; he didn't. It would be reasonable to infer that earning a scholarly degree is indicative of having developed some scholarly (research) ability and the ability to successfully present one's research to senior colleagues. He knows how to read and study, take exams, get licensed, and is a pretty good teacher. John used statistical analysis in analyzing data for his dissertation. He knew more about probability theory than most of his professors (and still does) but has found most of the rest of the statistics he learned as a graduate student only marginally helpful as an investor. The ability to critically and skeptically read and evaluate research is valuable. You could reasonably infer that John's doctoral research contributed to his ability to analyze data and evaluate research. His specific research involved evaluating the effectiveness, based on outcomes relevant to the military, of their alcohol treatment program. It had nothing to do with finance or investments.

John is a member of local and national professional (psychology) organizations. These have nothing to do with his work as an investment advisor. In order to belong to these organizations, one has to have earned certain academic and professional credentials and has to understand and adhere to a set of professional guidelines and ethical principles.

To summarize, we think you shouldn't be overly impressed by John's academic credentials. It is fair to assume that he was a successful student, has some background in statistics and research (though most of research background isn't recent) and has a reasonably long history working in a (non-financial) profession, which requires adherence to state and federal laws and regulations regarding, among other things, a code of ethics and confidentiality and protection of records. He has known and worked with many non-financial professionals, most of whom he respected, some of whom he admired, and most of whom had neither the commitment nor the temperament to become good investors. You should not assume that John's academic credentials are meaningful indicators of his investment ability.

ITEM 3: DISCIPLINARY INFORMATION – NONE

There is nothing to report. John has been licensed or regulated by state and/or federal agencies, as a psychologist or investment advisor, for the last 40 years. He has no history of any civil, criminal, regulatory, or professional (or other) violations. He hasn't been the subject of any ethical or legal or administrative investigation. He has never declared bankruptcy and has not been found liable in, nor has he been a party to, any arbitration proceeding.

ITEM 4: DISCIPLINARY INFORMATION – NONE

ITEM 5: ADDITIONAL COMPENSATION – NONE

ITEM 6: SUPERVISION

John Reis is authorized to make investment decisions and effect transactions on behalf of clients. John Ervin, available at 206-495-9957 and john@ervins.net, is the Chief Compliance Officer for Ervin Investment Management and supervises John R's compliance with our policies and procedures. Beyond this, all IARs at Ervin Investment Management routinely copy each other on all e-mail communication with clients, discuss complex situations with each other, and double check each other's work.