



## **Part 2A of Form ADV: Firm Brochure**

**February 21, 2019**

This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Ralph Parks Investment Group LLC. D.B.A Parks Capital. If you have any questions about the contents of this Disclosure Brochure, please contact us at 585-248-5700 and/or [support@rpigllc.com](mailto:support@rpigllc.com). The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Sheller Wealth to assist you in determining whether to retain Parks Capital.

Additional information about Parks Capital is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 138121.

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## **2. Material Changes**

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There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

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## 4. Advisory Business

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### A. Firm Information

Ralph Parks Investment Group LLC. D.B.A Parks Capital (herein "Parks Capital", the "Advisor" or "we" or "us") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The Advisor was established in 2005 by its founder Ralph Parks and his key associates Ms. Gina Griffo & Mr. Rajiv Dixit. At the time of its inception, the Advisor was a single member limited liability company ("LLC") owned by Ralph Parks. On December 31, 2011, the entire ownership interest of the Advisor was acquired by Aspire Capital Management Inc. ("ACM"). ACM is owned by Ms. Gina Griffo (Chief Executive Officer) and Mr. Rajiv Dixit (Chief Investment Officer).

### B. Advisory Services Offered

Parks Capital offers wealth management services to individuals, high net worth individuals, trusts, estates, corporations and businesses (each referred to as a "Client").

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

The Advisor is currently managed with a single vision of helping its Clients achieve their respective long term financial goals through active planning, execution and risk management. We take pride in our exceptional customer service ability and prudent wealth management style.

#### Wealth Management Services

Wealth management services consists of a broad range of comprehensive financial planning services and investment management services.

*Financial Planning Services* - Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning may encompass one or more areas of need, including, but not limited to investment planning, tax planning, estate planning, retirement planning, personal savings, education savings, insurance needs and other areas of a Client's financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Parks Capital may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations.

Financial planning recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

*Investment Management Services* - The Advisor currently manages all client assets on a discretionary basis under the following two investment programs:

- **Managed Discretionary Fusion Portfolio:**

Under this program, the Advisor may buy and sell equity, Exchange Traded Funds ("ETFs") and no-load mutual fund investments suitable to achieve the Client's long term capital appreciation goals.

- **The Balanced Portfolio:**

*In the balanced portfolio*, customized portfolios are created for Clients based on the individual income and growth needs. The portfolio may include investments in no-load<sup>1</sup> mutual funds, exchange traded funds, equity & index options, domestic equity securities and fixed income securities.

Parks Capital's portfolios are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Parks Capital will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

At no time will Parks Capital accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the terms of the Client wealth management agreement. For additional information, please see Item 12 – Brokerage Practices.

### **C. Client Account Management**

We, at Parks Capital believe that every Client is unique in their needs for financial products and planning. Thus, we focus on creating a customized financial plan in accordance with the Client's future financial goals.

<sup>1</sup> A mutual fund in which shares are sold without a commission or sales charge.

- **Managed Discretionary Fusion Portfolio:**

An account under this program does not have the ability to be customized, but customization can be achieved by allocating only a certain portion of the Client's entire net-worth in this program.

- **The Balanced Portfolio:**

An account under this program is customized based on Client's specific need for product, suitability and financial goals.

A Client may impose reasonable restrictions on the management of their account as long as those restrictions fall within the Advisor's investment strategy.

#### **D. Wrap Fee Programs**

Parks Capital includes securities transaction fees together with its wealth management fees. Including these fees into a single asset-based fee is considered a "Wrap Fee Program". The Advisor customizes its wealth management services for its Clients. The Advisor sponsors the Parks Capital Wrap Fee Program solely as a supplemental disclosure regarding the combination of fees. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 –Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

#### **E. Assets Under Management**

As of December 31, 2018, Parks Capital manages \$41,311,280 in Client assets, all of which are on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## 5. Fees and Compensation

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Wealth management fees ("fees") are based on the market value of assets under management at the closing date of the previous quarter. Funds added or withdrawn from an account during the previous quarter are charged on a pro-rata basis. Initially, fees are billed on a prorated basis from inception of the account for the remainder of the calendar quarter and quarterly in advance thereafter.

The fee schedule below details the fee charged to Client accounts:

<b>Program Type</b>	<b>Quarterly (%)</b>	<b>Annually (%)</b>
Managed Discretionary Fusion	0.375%	1.50%
The Balanced Portfolio	0.375%	1.50%

The fees are non-negotiable.<sup>2</sup>

Fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Parks Capital at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Parks Capital directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid wealth management fees from the effective date of termination to the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

Parks Capital is a fee-based registered investment advisory firm. This means that the Advisor and its Advisory Persons do not accept compensation for sale of securities or investment products including asset-based sales charges or service fees from sale of mutual funds.

<sup>2</sup> Some clients have been grand fathered into a lower fee schedule  
Parks Capital - Form ADV 2A Disclosure Brochure

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Parks Capital includes securities transactions costs as part of its overall fees through the Parks Capital Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to Parks Capital for wealth management services or part of the Parks Capital Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Parks Capital, but would not receive the services provided by Parks Capital which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Parks Capital to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.



## **6. Performance-Based Fees and Side-By-Side Management**

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The Advisor does not charge a performance-based fee or engage in side-by-side management that is, fees based on a share of capital gains on or capital appreciation of the assets of a Client (such as a Client that is a hedge fund or other pooled investment vehicle). Accounts are not charged another type of fee, such as an hourly or flat fee.

## **7. Types of Clients**

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Parks Capital is proud to offer to its wealth management services to a diverse range of investors. Our Clients include individuals, high net worth individuals, trusts, estates and other businesses and corporations.

While we focus more on the quality of our Client base as oppose to their account size, we do have to maintain a minimum opening account size of \$500,000 to make our services effective for the Client. The minimum account size may be reduced at the sole discretion of Parks Capital.

## 8. Methods of Analysis, Investment Strategies and Risk of Loss

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### A. Methods of Analysis and Investment Strategies

- **Managed Discretionary Fusion Portfolio:**

This program is designed for the Client who needs exposure to an all cap growth equity portfolio. Clients should have a minimum of 3-5 years of investment time horizon. This strategy involves a high turnover ratio which could lead to tax inefficient returns and higher taxes.

The strategy focuses on the macro and micro analysis of U.S. financial markets. The Fusion portfolio is available only on a discretionary account basis. The investment process in this portfolio can be best described as a two-step process.

- **Step 1: Macro Market Analysis:**

In this step the Advisor determines the macro direction of the equity markets in the United States. Only if the macro direction test is positive i.e. Advisor believes the current market trend is moving upwards, the investment process moves to the next step. Otherwise all assets in the portfolio remain in passive investment until the above scenario is attained.

- **Step 2: Micro Market Analysis:**

Once it is determined that the overall market trend is positive, the Advisor uses an advanced technical configuration to determine what would be the best possible investment opportunity available in the market at that given time. Such strategies are selected from a group of 3,000 - 4,000 pre-selected U.S. equity securities and mutual funds. Careful consideration is made towards reaching the goals of adequate diversification, liquidity and volume.

**Investment Time Horizon:** 3 - 5 Years

**Risk Profile:** Moderate - Aggressive

**Tax Efficiency:** Low

- **The Balanced Portfolio**

This strategy is designed for the Clients who have a long-term objective of income and or growth. Client individual needs are analyzed. Each portfolio is custom designed to meet Client individual investment objectives based on their financial profile. Investments are made on a discretionary basis. Investments in this type of account include but are not limited to stocks, mutual funds, exchange traded funds, options, bonds, preferred stocks and certificate of deposits. The Advisor conducts periodic reviews to ensure goals of adequate diversification, liquidity and income are being achieved.

**Investment Time Horizon:** Based on individual needs

**Risk Profile:** Based on individual needs

**Tax Efficiency:** Based on individual needs

**B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Parks Capital will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategy:

Market Risk

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risk

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risk

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **9. Disciplinary Information**

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There are no legal, regulatory or disciplinary events involving Parks Capital or any of its Supervised Persons. Parks Capital values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 138121.

## **10. Other Financial Industry Activities and Affiliations**

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Ms. Griffo is a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with Parks Capital. As an insurance professional, Ms. Griffo may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Griffo is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Griffo or the Advisor.

## **11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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The Advisor's policy is to consider the Clients interest before personal interests. Employees of the Advisor may execute transactions in their personal accounts in the same securities that are being executed in Client accounts as long as there is not a perceived or potential conflict of interest. The Advisor has adopted a Code of Ethics and Personal Trading Policy in compliance with Investment Advisers Act rule 204A-1. The Advisor requires all associated persons to adhere to the highest ethical standards; placing Client interest before personal interest. The Advisor also requires access persons to report initial and annual holdings reports, quarterly transaction reports, and to pre-clear transactions in IPO's and private placements. In addition, the Advisor has outlined the sanctions for failing to comply with the Advisor's Policies and Procedures. The Code of Ethics is available upon request.

Parks Capital has adopted the following procedures:

- Supervised Persons are to identify any personal investment account and any accounts in which the employee has beneficial interest, including any accounts for the immediate family and household member, upon hire, annually thereafter and upon opening or closing any account(s).
- Initial Holdings reports must be submitted to the Chief Compliance Officer ("CCO").
- Annual Holdings reports must be subsequently submitted to the CCO.
- Personal investments in initial public offerings and limited offerings by access persons will be required to be pre-cleared.
- Employees are only permitted to trade subsequent to Client orders being fully completed and evidenced by a time-stamp (unless employees are trading through a block traded with Client accounts).
- All personal transaction reports are delivered to the CCO within 10 days following the quarter end. If any person opens a new account or trades outside of the accounts previously disclosed to the CCO, the advisory person must report the account immediately to the CCO.
- All personal securities transactions are covered except transactions in direct obligations of the government of the United States, broker's acceptances, bank certificates of deposit, commercial paper and high quality short-term debt instruments, or shares issued by non-proprietary registered open-end investment companies managed by another advisor.
- All supervised persons will be required to promptly report any violations of the Advisor's code of ethics to the CCO.
- The review officer will review all employees' reports of personal securities transactions for compliance with the Advisor's policies, including the Insider Trading Policy, regulatory requirements and the Advisor's fiduciary duty to its Clients, among other things.



## 12. Brokerage Practices

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### A. Recommendation of Custodian[s]

Parks Capital does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Parks Capital to direct trades to the Custodian as agreed upon in the wealth management agreement. Further, Parks Capital does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Parks Capital does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by Parks Capital. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Parks Capital may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and/or its reputation. Parks Capital generally recommends to Clients that they use the brokerage and custody services of Excel Securities & Associates, Inc. ("Excel"), of Rochester, NY. Excel is a FINRA registered broker-dealer and member SIPC. Excel is a fully-disclosed introducing broker-dealer with Pershing LLC ("Pershing"), a FINRA-registered broker-dealer, member SIPC and the physical custodian of Client funds and securities. Parks Capital is not affiliated with, or related to, Excel or Pershing. Pershing will serve as the Client's "qualified custodian". Parks Capital maintains an institutional relationship with Pershing, whereby the Advisor receives economic benefits from Pershing. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Parks Capital does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits with Pershing. Please see Item 14 below.**

2. Brokerage Referrals - Parks Capital does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Parks Capital will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Parks Capital will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Parks Capital will execute its transactions through the Custodian as directed by the Client. Parks Capital may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

### **13. Review of Accounts**

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The Advisor reviews accounts for performance on a portfolio level monthly and reviews securities held in the portfolios periodically. Recommendations are documented and implemented by a principal of the Advisor. Suitability reviews are offered to Clients on a Bi-Annual basis; Investment performance reports, provided by Pershing and Abridge Solutions Inc., are reviewed by the principals of the Advisor upon receipt and with the Client periodically upon request.

Pershing, as clearing agent, has custody of the assets and transmits trade confirmations to the Client, Excel Securities & Associates, and the Advisor for all transactions executed, monthly statements for each month in which there is activity, and statements of securities held in custody at least quarterly to Clients. Pershing provides the advisor with investment performance summaries for the Client accounts which are available to the Client upon request.

## **14. Client Referrals and Other Compensation**

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### **A. Compensation Received by Parks Capital**

Except as noted above in Item 10 – Other Financial Activities and Affiliations, Parks Capital does not receive any other compensation for providing investment advisory services. Parks Capital may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Parks Capital may receive referrals of new Clients from a third-party.

### **B. Client Referrals from Solicitors**

Parks Capital does not engage paid solicitors for Client referrals.

## **15. Custody**

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Parks Capital does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Parks Capital to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Parks Capital to ensure accuracy, as the Custodian does not perform this review. For more information see Item 12 - Brokerage Practices.

## **16. Investment Discretion**

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The Advisor has full discretion over trading in Client accounts.

Parks Capital only accepts accounts when it is given specific trading authorization. The Advisor accepts certain limitations on such discretion, for example, investment restrictions or prohibitions as determined by individual Clients. These limitations will be agreed upon at the outset of the relationship and are subject to change, with notice from the Client. The Client is requested to verify or change any restrictions annually in writing. Client restrictions may include specific securities or sectors or maintenance of certain cash amounts. Clients are required to sign a Discretionary Wealth management Agreement authorizing Parks Capital to assume discretionary authority.

## **17. Voting Client Securities**

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The Advisor will vote proxies on behalf of our Clients as the Client has delegated that authority to us in their contract agreement. When the Advisor accepts such responsibility, it will only cast proxy votes in a manner consistent with the best interest of its Clients. Absent special circumstances, which are fully- described in the Advisor's Proxy Voting Policies and Procedures, all proxies will be voted consistent with guidelines established and described in the Advisor's Proxy Voting Policies and Procedures, as they may be amended from time-to- time. The Advisor understands its duty to vote Client proxies and to do so in the best interest of Clients. Furthermore, it is understood that any material conflicts between the Advisor's interests and Clients with regard to proxy voting must be resolved before proxies are voted. Clients may request a copy of our written policies and procedures regarding proxy voting and/or information on how particular proxies were voted by contacting our CCO.

**Item 18: Financial Information**

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Parks Capital does not have custody of Client funds or securities, or require or solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance.

Advisor knows of no financial condition that is reasonably likely to impair its ability to meet contractual commitments to Clients.

Parks Capital has not been the subject of a bankruptcy petition at any time during the past ten years.





## **Appendix 1 - Wrap Fee Program Brochure**

### **Managed Discretionary Fusion Portfolio**

#### **The Balanced Portfolio**

**February 21, 2019**

This Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices of Ralph Parks Investment Group LLC. D.B.A Parks Capital. If you have any questions about the contents of this Wrap Fee Program Brochure, please contact us at 585-248-5700 and/or [support@rpigllc.com](mailto:support@rpigllc.com). The information in this Wrap Fee Program Brochure has not been approved or verified by the U.S. Securities and Exchange Commission or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Sheller Wealth to assist you in determining whether to retain Parks Capital.

Additional information about Parks Capital is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 138121.

## **2. Material Changes**

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There have been no material changes to this Wrap Fee Program Brochure since the last filing and distribution to Clients.

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## 4. Services Fees & Compensation

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### A. Services

Parks Capital provides wealth management services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the Parks Capital Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting Parks Capital as your investment advisor.

As part of the wealth management fees noted in Item 5 – Fees and Compensation of the Disclosure Brochure, Parks Capital includes normal securities transaction fees as part of the overall wealth management fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”. The Advisor sponsors the Parks Capital Wrap Fee Program.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees into the single “bundled” wealth management fee. This Wrap Fee Program Brochure references back to the Parks Capital Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. Please see Item 4 – Advisory Services of the Disclosure Brochure for details on Parks Capital’s investment philosophy and related services.

### B. Program Costs

Advisory services provided by Parks Capital are offered in a Wrap Fee Program structure whereby normal securities transaction costs are included in the overall wealth management fee paid to Parks Capital. As the level of trading in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transactions costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity in the Client’s account[s]. A Wrap Fee Program structure has a potential conflict of interest as the Advisor may have an incentive to limit the number of trades placed in the Client’s account[s]. Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.

### C. Fees

Wealth management fees (“fees”) are based on the market value of assets under management at the closing date of the previous quarter. Funds added or withdrawn from an account during the previous quarter are charged on a pro-rata basis. Initially, fees are billed on a prorated basis from inception of the account for the remainder of the calendar quarter and quarterly in advance thereafter.

The fee schedule below details the fees charged to Client accounts:

Program Type	Quarterly (%)	Annually (%)
Managed Discretionary Fusion	0.375%	1.50%
The Balanced Portfolio	0.375%	1.50%

The management fees are non-negotiable.<sup>3</sup>

<sup>3</sup> Some clients have been grand fathered into a lower fee schedule  
Parks Capital - Form ADV 2A Disclosure Brochure

Fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Parks Capital at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Parks Capital directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Under this Wrap Fee Program, Parks Capital includes securities transactions costs as part of its overall wealth management fee.

In addition, all fees paid to Parks Capital for wealth management services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds ("ETFs") to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. The Client may also incur other costs assessed by the Custodian or other parties for account related activity fees, such as wire transfer fees, fees for trades executed away from the Custodian and other fees. The Advisor does not control nor share in these fees. The Client should review both the fees charged by the fund[s] and the fees charged by Parks Capital to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure.

## **5. Account Requirements & Types of Clients**

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Parks Capital offers wealth management services to individuals, high net worth individuals, trusts, estates, corporations and businesses. While we focus more on the quality of our Client base as oppose to their account size, we do have to maintain a minimum opening account size of \$500,000 to make our services effective for the Client. This minimum may be reduced at the sole discretion of the Advisor. Please see Item 7 – Types of Clients of the Disclosure Brochure for additional information.

## **6. Portfolio Manager Selection and Evaluation**

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### **Portfolio Manager Selection**

Parks Capital serves as sponsor and as portfolio manager for the services under this Wrap Fee Program.

### **Related Persons**

Parks Capital personnel serve as portfolio managers for this Wrap Fee Program. Parks Capital does not serve as a portfolio manager for any third-party wrap fee programs.

### **Performance-Based Fees**

Parks Capital does not charge performance-based fees.

### **Supervised Persons**

Parks Capital Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4 – Fees and Compensation of the Disclosure Brochure.

### **Methods of Analysis**

Please see Item 8 – Methods of Analysis of the Disclosure for details on the research and analysis methods employed by the Advisor.

### **Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Parks Capital will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account[s]. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.

### **Proxy Voting**

Parks Capital may vote securities proxies on behalf of its Clients. When Parks Capital accepts such responsibility, it will only cast proxy votes in a manner consistent with the best interest of its Clients. Please refer to Item 17 – Proxy Voting of the Disclosure Brochure for the Advisor's proxy voting policies and procedures.

## **7. Client Information Provided to Portfolio Managers**

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The Wrap Fee Program offered by the Advisor is managed by the Advisor's principals Ms. Gina Griffo & Mr. Rajiv Dixit. Client's suitability and other information is actively available to the manager due to their role with the Advisor.

Parks Capital tailors its advisory services to the individual needs of Clients by reviewing a Client's personal information, goals and risk tolerance before the Client enrolls in any sponsored program. Parks Capital's wealth management agreement includes a disclosure statement and a suitability questionnaire that all potential clients are asked to complete. Clients may impose restrictions on investing in certain securities or types of securities as part of this initial review, and may impose restrictions on their accounts at any time. Clients are requested to inform Parks Capital of any changes in the information provided at account inception and to review this information at least annually in writing.



## **8. Client Contact with Portfolio Managers**

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There is no restriction placed on contacting the portfolio managers directly. Clients are encouraged to interact with the managers reviews and updated to portfolio strategies.

Portfolio managers are available during normal business hours and can be contact at (585) 248-5700 / (877) 416-5700 or at [support@rpiqlc.com](mailto:support@rpiqlc.com).

## 9. Additional Information

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### **A. Disciplinary Information and Other Financial Industry Activities and Affiliations**

Parks Capital values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or by our CRD# 138121. Please see Item 9 – Disciplinary Information of the Disclosure Brochure as well as Item 3 – Disciplinary Information of each Advisory Person’s Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

#### Other Financial Activities and Affiliations

Please see Items 10 – Other Financial Industry Activities and Affiliations and 14 – Other Compensation and Client Referrals of the Disclosure Brochure.

### **B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information**

The Advisor’s policy is to consider the Clients interest before personal interests. Employees of the Advisor may execute transactions in their personal accounts in the same securities that are being executed in Client accounts as long as there is not a perceived or potential conflict of interest. We have adopted a Code of Ethics and Personal Trading Policy in compliance with Investment Advisers Act rule 204A-1. The Advisor requires all associated persons to adhere to the highest ethical standards; placing Client interest before personal interest. The Advisor also requires access persons to report initial and annual holdings reports, quarterly transaction reports, and to pre-clear transactions in IPO’s and private placements. In addition, the Advisor has outlined the sanctions for failing to comply with the Advisor’s Policies and Procedures. The Code of Ethics is available upon request.

#### Parks Capital has adopted the following procedures:

- Employees are to identify any personal investment account and any accounts in which the employee has beneficial interest, including any accounts for the immediate family and household member, upon hire, annually thereafter and upon opening or closing any account(s).
- Initial Holdings reports must be submitted to the Chief Compliance Officer (“CCO”).
- Annual Holdings reports must be subsequently submitted to the CCO.
- Personal investments in initial public offerings and limited offerings by access persons will be required to be pre-cleared.
- Employees are only permitted to trade subsequent to Client orders being fully completed and evidenced by a time-stamp (unless employees are trading through a block traded with Client accounts).
- All personal transaction reports are delivered to the CCO within 10 days following the quarter end. If any person opens a new account or trades outside of the accounts previously disclosed to the CCO, the advisory person must report the account immediately to the CCO.

- All personal securities transactions are covered except transactions in direct obligations of the Government of the United States, broker's acceptances, bank certificates of deposit, commercial paper and high quality short-term debt instruments, or shares issued by non-proprietary registered open-end investment companies managed by another advisor.
- All supervised persons will be required to promptly report any violations of the Advisor's code of ethics to the CCO.
- The review officer will review all employees' reports of personal securities transactions for compliance with the Advisor's policies, including the Insider Trading Policy, regulatory requirements and the Advisor's fiduciary duty to its Clients, among other things.

The Advisor reviews accounts for performance on a portfolio level monthly and reviews securities held in the portfolios weekly. Recommendations are documented and implemented by a principal of the Advisor. Suitability reviews are offered to Clients on a Bi- Annual basis; Investment performance reports, provided by Pershing, are reviewed by the principals of the Advisor upon receipt and with the Client periodically upon request.

Please see Item 14 – Other Compensation and Client Referrals of the Disclosure Brochure for details on additional compensation that may be received by Parks Capital or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Brochure) provides details on any outside business activities and the associated compensation.

Parks Capital does not engage paid solicitors for Client referrals.

Parks Capital does not have custody of Client funds or securities, or require or solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance.

Advisor knows of no financial condition that is reasonably likely to impair its ability to meet contractual commitments to Clients.

Parks Capital has not been the subject of a bankruptcy petition at any time during the past ten years.



**FORM ADV PART 2B – Brochure Supplement**

**for**

**Rajiv N. Dixit  
Chief Investment Officer**

**Effective: February 21, 2019**

This Form ADV Part 2B ("Brochure Supplement") provides information about the background and qualifications of Rajiv N. Dixit (CRD# 5144936) in addition to the information contained in the Ralph Parks Investment Group LLC, D.B.A. Parks Capital ("Parks Capital" or the "Advisor", CRD# 138121) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Parks Capital Disclosure Brochure or this Brochure Supplement, please contact us at (585) 248-5700.

Additional information about Mr. Dixit is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5144936.

## Item 2 – Educational Background and Business Experience

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Rajiv N. Dixit, born in 1979, is dedicated to advising Clients of Parks Capital as the Chief Investment Officer and Chief Operating Officer. Mr. Dixit earned a Bachelor of Science in Finance from Rochester Institute of Technology in 2001. Additional information regarding Mr. Dixit's employment history is included below.

### Employment History:

Chief Investment Officer and Chief Operating Officer, Ralph Parks Investment Group LLC, D.B.A. Parks Capital	02/2006 to Present
Director, Campus Ventures LLC.	02/2004 to 02/2006

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Dixit.*** Mr. Dixit has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Dixit.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Dixit.***

However, we do encourage you to independently view the background of Mr. Dixit on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5144936.

## Item 4 – Other Business Activities

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Mr. Dixit is dedicated to the investment advisory activities of Parks Capital's Clients. Mr. Dixit does not have any additional business activities.

## Item 5 – Additional Compensation

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Mr. Dixit is dedicated to the investment advisory activities of Parks Capital's Clients. Mr. Dixit does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Dixit serves as the Chief Investment Officer and Chief Operating Officer of Parks Capital and is supervised by Gina Griffo, the Chief Compliance Officer. Ms. Griffo can be reached at (585) 248-5700.

Parks Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Parks Capital. Further, Parks Capital is subject to regulatory oversight by various agencies. These agencies require registration by Parks Capital and its Supervised Persons. As a registered entity, Parks Capital is subject to examinations by regulators, which may be announced or unannounced. Parks Capital is required to

periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**FORM ADV PART 2 B – Brochure Supplement**

**for**

**Gina M. Griffo  
CEO-Portfolio Manager-Compliance Officer**

**Effective: February 21, 2019**

This Form ADV Part 2B ("Brochure Supplement") provides information about the background and qualifications of Gina M. Griffo (CRD# 3046431) in addition to the information contained in the Ralph Parks Investment Group LLC, D.B.A. Parks Capital ("Parks Capital" or the "Advisor", CRD# 138121) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Parks Capital Disclosure Brochure or this Brochure Supplement, please contact us at (585) 248-5700.

Additional information about Mrs. Griffo is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 3046431.

## Item 2 – Educational Background and Business Experience

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Gina M. Griffo, born in 1969, is dedicated to advising Clients of Parks Capital as the Chief Executive Officer and Chief Compliance Officer. Mrs. Griffo attended The University of Rochester. Additional information regarding Mrs. Griffo's employment history is included below.

### Employment History:

Chief Executive Officer and Chief Compliance Officer, Ralph Parks Investment Group LLC, D.B.A. Parks Capital	11/2005 to Present
Investment Management Analyst, Smith Barney	03/1998 to 11/2005

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mrs. Griffo.*** Mrs. Griffo has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mrs. Griffo.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mrs. Griffo.***

However, we do encourage you to independently view the background of Mrs. Griffo on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 3046431.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mrs. Griffo is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mrs. Griffo's role with Parks Capital. As an insurance professional, Mrs. Griffo may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mrs. Griffo is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mrs. Griffo or the Advisor.

## Item 5 – Additional Compensation

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Mrs. Griffo has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mrs. Griffo serves as the Chief Executive Officer and Chief Compliance Officer of Parks Capital and can be reached at (585) 248-5700.

Parks Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Parks Capital. Further, Parks Capital is subject to regulatory oversight by various agencies. These agencies require registration by Parks Capital and its Supervised Persons. As a registered entity, Parks Capital is subject to examinations by regulators, which may be announced or unannounced. Parks Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: February 13, 2019

### Our Commitment to You

Ralph Parks Investment Group LLC, D.B.A. Parks Capital ("Parks Capital" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Parks Capital (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Parks Capital does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Parks Capital does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Parks Capital or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Parks Capital does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as

described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

**Any Questions?**

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (585) 248-5700.