

V2 Financial Group, LLC

1536 East Bailey Road
Naperville, IL 60565

Telephone: 630-364-4529

www.v2financialgroup.com

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of V2 Financial Group, LLC. If you have any questions about the contents of this brochure, contact us at 630-364-4529. 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 V2 Financial Group, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

V2 Financial Group, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment on March 5, 2018, we have the following material changes to report:

- As of June 2018, our firm transitioned from a state registered investment advisory firm to an SEC registered firm.
- As of February 2019, our Chief Compliance Officer changed from Venkata Vedam to Venkat Krishnamurthy.

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Item 4 Advisory Business

Description of Services and Fees

V2 Financial Group, LLC (hereinafter "V2" or the Firm") is a registered investment adviser primarily based in Naperville, IL. We are organized as a limited liability company. V2 has been in business since January 2007. V2 is owned by Venkatakrishna S. Vedom (a.k.a Venkata Vedom) and Venkatram Krishnamurthy (a.k.a Venkat Krishnamurthy). At V2 our primary goal is to leverage our finance and economics education at the University Of Chicago Booth School Of Business, for the benefit of our investors. We believe successful investing requires systematic planning, disciplined execution and ongoing evaluation of results and our goal is to implement these for our clients.

As used in this brochure, the words "we", "our" and "us" refer to V2 Financial Group, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

Currently, we offer the following investment advisory services, which are personalized to each individual client:

- Asset Management Services

Our services and models are built upon the foundations of modern portfolio theory, macroeconomic analysis and behavioral finance. We make investment decisions based on extensive, ongoing fundamental and technical analysis. While we take a long term approach to investing, we are tactical in our asset allocation depending on macroeconomic conditions. Our tactical investment strategies capitalize on short term market fluctuations without sacrificing the benefits of a long term asset allocation strategy.

Once we have discussed a client's goals and analyzed their tolerance for risk, we manage our client's investments by building and implementing a well diversified portfolio balanced across at least 10 - 15 different asset classes (e.g. US large company stocks, emerging market stocks, different types of bonds, commodities etc) representing investments across the globe. The proportions of these asset classes at any given time will depend upon the client's investment profile, circumstances (e.g. age, tolerance for risk etc), macroeconomic conditions, market fluctuations and the recommendations from our investment model, which is built using the concepts of "modern portfolio theory". Our approach, which combines long term strategic portfolio allocations with shorter term tactical allocation shifts, blends the traditional "buy and hold" approach with a more active "tactical" management approach. Our portfolio management style is not predicated upon stock picking, market timing or frequent trading.

Asset Management Services

We offer discretionary asset management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we may customize an investment portfolio for you according to your risk tolerance and investing objectives. We may also invest your assets using a predefined strategy, or we may invest your assets according to one or more model portfolios developed by our firm. Once we construct an investment portfolio for you, or select a model portfolio, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without

your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing.

Termination

The client may terminate the advisory or management agreement without penalty (full refund of monies paid) within five business days of executing the Agreement. After the first five days, services will continue until either party terminates the agreement with ten (10) days written notice. If termination occurs prior to the end of a calendar quarter, the client will be invoiced for fees due on a pro-rata basis, and based upon services already delivered.

As of January 31, 2019, we provide continuous management services for \$156,679,560 in client assets on a discretionary basis.

Item 5 Fees and Compensation

Asset Management

Asset management services are provided for clients who need us to manage the investment accounts where the client's funds are invested. Our asset management services will typically be guided by an investment plan; however there are no additional fees for these plans as we include this as a value-add.

Fees for asset management services are billed and payable quarterly in arrears based on the value of your account on the last day of the quarter. If the management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the management fee is payable in proportion to the number of days in the quarter for which you are a client. Asset management fees are calculated using the blended annual fee schedule set forth below. Generally, management fees are not negotiable; however, annual fees may be lowered at the Firm's sole discretion.

ASSETS UNDER MANAGEMENT (AUM)	ANNUAL FEES*
Up to \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.75%
\$3,000,001 - \$5,000,000	0.50%
\$5,000,001 - \$10,000,000	0.25%
Over \$10,000,000	Negotiable

e.g.

(1) Fees for a client with AUM of \$500,000 would be \$5,000

(2) Fees for a client with AUM of \$1,500,000 would be \$10,000 (1% up to 1M) + \$3,750 (.75% for 1M-3M) = \$13,750

(3) Fees for a client with AUM of \$3,500,000 would be \$10,000 (1% up to 1M) + \$15,000 (.75% for 1M-3M) + \$2,500 (.5% for 3M-5M) = \$27,500

(4) Fees for a client with AUM of \$5,500,000 would be \$10,000 (1% up to 1M) + \$15,000 (.75% for 1M-3M) + \$10,000 (.5% for 3M-5M) + \$1,250 (.25% for 5M-10M) = \$36,250

(5) Fees for a client with AUM over \$10,000,000 (Negotiable)

****Important Disclosures Regarding Fees:***

- ***Annual fees are in addition to mutual fund expenses, brokerage trading costs, brokerage fees and private manager fees.***
- ***Regardless of Assets Under Management (AUM), a Minimum annual fee of \$2,500 will be assessed for accounts smaller than \$250,000. Minimum annual fees may be waived or discounted at the Firm's discretion. In the event your account is assessed a minimum annual fee, please note that such fee may be greater than 3% (depending on the account size) and fees greater than 3% are in excess of industry norm. Similar advisory services can be obtained for less. However, as part of our fiduciary duty to clients, we will endeavor to determine whether fees are reasonable in relation to services provided.***
- ***529 plan accounts will be assessed a flat rate of 0.50% of the value of the account(s).***

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when the following requirements are met:

- You provide our firm with written authorization permitting the fees to be paid directly from your account held by the qualified custodian.
- We send you a fee notice showing the amount of the fee, the value of the assets on which the fee is based, and the specific manner in which the fee was calculated.
- The qualified custodian agrees to send you a statement, at least quarterly, indicating all amounts dispersed from your account including the amount of the advisory fee paid directly to our firm.

We encourage you to reconcile our fee notices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our fee notice and the statement(s) you receive from the qualified custodian please call our main office number located on the cover page of this brochure.

Performance Fee Arrangements

As further disclosed in Item 6, in limited circumstances and provided the client meets the qualification requirement set forth in Item 6, we may enter into a performance-based fee arrangement when agreed to in writing by the client. Generally, this type of fee arrangement will be comprised of two components: an "asset-based fee" and a "performance-based fee." The asset-based fee component is assessed in the absence of any excess returns.

The asset-based fee component will be billed and payable quarterly in arrears, based on the value of the portfolio as of the close of business on the last business day of each quarter. If the Agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the asset-based fee is payable in proportion to the number of days in the quarter for which you are a client. Asset-based management fees are calculated using a blended annual fee schedule that shall be agreed to and memorialized in the advisory agreement.

The performance-based fee component will be billed annually in arrears. At the end of the calendar year (as of Dec 31), we will calculate the difference between the total return of the portfolio (Money weighted Return herewith referred to as IRR) and the total return (or Fixed value) of a benchmark (as specified in the advisory agreement) for the calendar year. This difference is referred to as "Excess return." In the event the Excess return is positive, the performance fee shall be calculated as a percentage (as specified in the advisory agreement) of such excess returns. In the event the client makes a complete withdrawal from the account on a date other than year-end, Performance based

fees will be calculated as of the withdrawal date, and will be due at the time of withdrawal. Performance-based fees will only be applied if the IRR of the portfolio is positive as measured from the start date of the performance based fee structure.

The total advisory fee billed on accounts that have entered into a performance arrangement will be an aggregate of the both the asset-based fee and the performance-based fee component as set forth in the investment advisory agreement.

In the event client enters into a performance-based fee arrangement and remains on the performance-based structure for a period of less than 3 years, there will be a minimum fee assessed of .25% per year (based on average balance Jan 1 - 31 December of each year or termination date) or a total fee of \$5000 (whichever is lower) upon exit of the performance-based fee arrangement (the "exit fee"). This provision shall only apply where fees paid by client while on the performance-based structure are less than the minimum exit fee.

Additional Fees and Expenses

In addition to Asset management fees, clients are responsible for mutual fund or other fund expenses, brokerage trading costs, brokerage fees and private manager fees. Advice offered by V2 may involve investment in mutual funds. Clients are hereby advised that all fees paid to V2 for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (as described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, these transaction charges may be incurred when purchasing or selling securities. V2 does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the client funds or securities. Clients should review all fees charged by mutual funds, brokers, custodians, third party advisers, V2, and others to fully understand the total amount of fees to be paid by the client.

Item 6 Performance-Based Fees and Side-By-Side Management

We may charge performance-based fees to "qualified clients" having a net worth greater than \$2,000,000 or for whom we manage at least \$1,000,000 immediately after entering an agreement for our services. Performance-based fees are fees based on a share of capital gains or capital appreciation of a client's account.

Fees will be adjusted for deposits and withdrawals made during the 12-month period. In the event the client makes a complete withdrawal from the account on a date other than year-end, fees will be due at the time of withdrawal. Refer to the *Fees and Compensation* section above for additional information on performance fee calculations and terms.

We manage accounts that are charged performance-based fees while at the same time managing accounts (perhaps with similar objectives) that are not charged performance-based fees ("side-by-side management"). Performance-based fees and side-by-side management create conflicts of interest, which we have identified and described in the following paragraphs.

Performance-based fees create an incentive for our firm to make investments that are riskier or more speculative than would be the case absent a performance fee arrangement. In order to address this potential conflict of interest, a senior officer of our firm periodically reviews client accounts to ensure that investments are suitable and that the account is being managed according to the client's investment objectives and risk tolerance.

Side-by-side management might provide an incentive for our firm to favor accounts for which we receive a performance-based fee. For example, we may have an incentive to allocate limited investment opportunities, such as initial public offerings, to clients who are charged performance-based fees over clients who are charged asset based fees only. To address this conflict of interest, we have instituted policies and procedures that require our firm to allocate investment opportunities (if they are suitable) in an effort to avoid favoritism among our clients, regardless of whether the client is charged performance fees.

Item 7 Types of Clients

V2 currently provides services only to Individuals and Small Businesses. In the future, V2 may provide services to Trusts, Investment companies and pension plans. In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we may recommend maintaining a certain level of assets in order to effectively manage the account.

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

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Modern Portfolio Theory (MPT) - a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully diversifying the proportions of various assets.

Risk: Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification.

Technical Analysis - involves studying past price patterns, trends and interrelationships in the financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities.

Risk: The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Cyclical Analysis - a type of technical analysis that involves evaluating recurring price patterns and trends. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions.

Risk: The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

Option Writing - a securities transaction that involves selling an option. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell a particular security at a specified price on or before the expiration date of the option. When an investor sells an option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. The option writer/seller receives a premium (the market price of the option at a particular time) in exchange for writing the option.

Risk: Options are complex investments and can be very risky, especially if the investor does not own the underlying stock. We do not use options strategies on a regular basis and never write or utilize naked option strategies.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. **It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.**

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Moreover, custodians and broker-dealers must report the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

We primarily invest in broadly diversified index based funds. The asset allocation mix (Stocks vs Bonds vs Commodities vs Cash) is determined based on the client's profile (e.g. age, time to retirement, tolerance for losses in the portfolio, liquidity needs) and determines the risk level of the portfolio.

Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. A description of the types of securities we may recommend to you and some of their inherent risks are provided below.

Exchange Traded Funds: Exchange traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on ETFs can be reduced by the costs to manage the funds.

Mutual Funds: Like exchange traded funds ("ETF"), mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

Money Market Funds: A money market fund is technically a security. The fund managers attempt to keep the share price constant at \$1/share. However, there is no guarantee that the share price will stay at \$1/share. If the share price goes down, you can lose some of or your principal. The U.S. Securities and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." In return for this risk, you should earn a greater return on your cash than you would expect from a Federal Deposit Insurance Corporation ("FDIC") insured savings account (money market funds are not FDIC insured). Next, money market fund rates are variable. In other

words, you do not know how much you will earn on your investment next month. The rate could go up or go down. If it goes up, that may result in a positive outcome. However, if it goes down and you earn less than you expected to earn, you may end up needing more cash. A final risk you are taking with money market funds has to do with inflation. Because money market funds are considered to be safer than other investments like stocks, long-term average returns on money market funds tends to be less than long term average returns on riskier investments. Over long periods of time, inflation can eat away at your returns.

Bonds: Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Item 9 Disciplinary Information

V2 has been registered since 2007, and neither the firm, nor any management persons have any legal or disciplinary events.

Item 10 Other Financial Industry Activities and Affiliations

We have not provided information on other financial industry activities and affiliations because we do not have any relationship or arrangement that is material to our advisory business or to our clients with any of the types of entities listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor
5. banking or thrift institution
6. accountant or accounting firm
7. lawyer or law firm
8. insurance company or agency
9. pension consultant
10. real estate broker or dealer
11. sponsor or syndicator of limited partnerships

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Description Code Of Ethics

V2 will always hold the client's interests above its own in making investment recommendations. The firm expects its employees to comply with all laws, rules and regulations applicable to its operation and business. V2 does not use inside or private information in making securities recommendations to clients, and will strive to avoid violations of the insider trading laws. V2 will be scrupulous in ensuring that it avoids conflicts of interests with its investment clients. Any real or potential conflicts of interests will be disclosed promptly to clients. All client information will be maintained in a confidential manner. V2 will endeavor to deal fairly with investment clients, service providers, and competitors, and shall not seek unfair advantage through improper concealment, abuse of confidential information, misrepresentation of material facts, or improper and unfair dealing. V2 will provide a copy of its code of ethics to any client or prospective client upon request.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

At times, the interests of the principals and staff members of V2 Financial Group correspond with its clients' interests, and at such times, it may invest in the same securities that are recommended to clients. However, if such a transaction presents a conflict of interest, V2 will not engage in the transaction, keeping clients' interests first.

Item 12 Brokerage Practices

We maintain relationships with several custodians/brokerage firms. We believe that recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the recommended broker-dealers, including the firm's reputation and financial stability, execution capabilities, commission rates, technology, and responsiveness to our clients and our firm.

We participate in the TD AMERITRADE Institutional program. TD AMERITRADE and is an independent and un-affiliated with our firm. However, we may receive some benefits from TD AMERITRADE through our participation in the institutional programs.

TD AMERITRADE Research and Other Benefits

Our firm participates in the TD AMERITRADE Institutional program. TD AMERITRADE Institutional is a division of TD AMERITRADE, Inc. ("TD AMERITRADE") member FINRA/SIPC/NFA. TD AMERITRADE is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. TD AMERITRADE offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Our firm receives some benefits from TD AMERITRADE through its participation in the program.

There is no direct link between our firm's participation in the program and the investment advice we give to our Clients. Our firm does receive benefits through our participation in the program that are typically not available to TD AMERITRADE retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to our firm by third party vendors.

Some of the products and services made available by TD AMERITRADE through the program may benefit our firm but may not benefit all Client accounts. These products or services may assist our firm in managing and administering Client accounts, including accounts not maintained at TD AMERITRADE. The benefits received by our firm through participation in the program do not depend on the amount of brokerage transactions directed to TD AMERITRADE and are not considered soft dollar benefits. As part of our fiduciary duties to our clients, we endeavor at all times to put the interests of our clients first.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

In limited circumstances, and at our discretion, some clients may instruct our firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our firm to use a particular broker, you should understand that this might prevent our firm from aggregating trades with other client accounts or from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our firm from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

Block Trades

We combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then allocation a portion of the shares to participating accounts in a fair and equitable manner. In the event that an order is only partially filled, the allocation of the shares purchased is typically proportionate to the size of the client's portfolio and is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13 Review of Accounts

Client accounts are reviewed on a periodic basis. The review can be driven by changes in market conditions, changes in the asset allocation, or changes in the client's investment circumstances (e.g. risk tolerance, liquidity needs, and time horizon). Account reviews are conducted by the Investment Adviser Representatives of the firm.

An other than periodic review can be driven by changes in market conditions, changes in the asset allocation, or changes in the client's investment circumstances (e.g. risk tolerance, liquidity needs, time horizon).

Written reports are provided to clients on a quarterly basis. Three reports are provided

1. A summary of the client's overall portfolio performance, for most recent quarter, current year, prior years (if client was under V2 management for entire year), and since inception. Performance data for applicable benchmark(s) and major market indices are also included.
2. A report showing the client's asset allocation (as of end of prior quarter), change in value of portfolio by time, holdings (stocks, bonds, mutual funds), performance of each account under management, and trading activity during the most recent quarter.
3. Market commentary and market data for the most recent quarter.

Item 14 Client Referrals and Other Compensation

V2 does not directly or indirectly compensate any third party individual or entity (Solicitor) for client referrals.

V2 does not receive any compensation from any third party in connection with providing investment advice to clients.

Item 15 Custody

Provided we receive your written authorization, we directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, registered investment company, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

Item 16 Investment Discretion

V2 assumes discretionary authority over clients' accounts that are entrusted by clients to V2 for asset management. A power of attorney from the custodian is executed before assuming discretionary authority. In the absence of a power of attorney from the custodian, a power of attorney prepared by V2 Financial Group is executed before assuming discretionary authority. Clients may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for the management of account(s).

Item 17 Voting Client Securities

V2 will not vote proxies on behalf of advisory client's accounts.

Clients will receive their proxies directly from their custodian or transfer agent. Clients may contact V2 with questions, with the understanding that V2 does not offer legal advice regarding proxy votes.

Item 18 Financial Information

V2 is not required to provide financial information to clients because we do not:

- require the prepayment of fees in excess of \$1,200 and six or more months in advance, or
- take custody of client funds or securities, or
- have a financial condition that is reasonably likely to impair our ability to meet our commitments to clients.

Item 19 Requirements for State Registered Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

Item 20 Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, the trade error will be corrected in the trade error account of the executing broker-dealer and you will keep the profit.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.