

**Item 1 – Cover Page**



Post Office Box E  
Boulder, CO 80306  
(303) 351-1517  
[www.financialmountainonline.com](http://www.financialmountainonline.com)

Firm Brochure  
(Part 2A of Form ADV)

This Brochure provides information about the qualifications and business practices of Financial Mountain Inc. If you have any questions about the contents of this Brochure, please contact us at (303) 351-1517 or [bob@financialmountainonline.com](mailto:bob@financialmountainonline.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Financial Mountain Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Financial Mountain Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

February 18, 2011

## Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated February 18, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Robert Zimberg (president) at (303) 351-1517 or [bob@financialmountainonline.com](mailto:bob@financialmountainonline.com). Our Brochure is also available on our web site [www.financialmountainonline.com](http://www.financialmountainonline.com) also free of charge.

Additional information about Financial Mountain Inc. is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with Financial Mountain Inc. who are registered, or are required to be registered, as investment adviser representatives of Financial Mountain Inc.

### Item 3 -Table of Contents

Item 1 – Cover Page .....	i
Item 2 – Material Changes.....	ii
Item 4 – Advisory Business .....	1
Item 5 – Fees and Compensation .....	2
Item 6 – Performance-Based Fees and Side-By-Side Management.....	3
Item 7 – Types of Clients.....	3
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	3
(Required language. See Instruction 8.A.) “Investing in securities involves risk of loss that clients should be prepared to bear.” .....	3
Item 9 – Disciplinary Information .....	5
Item 10 – Other Financial Industry Activities and Affiliations.....	5
Item 11 – Code of Ethics .....	6
Item 12 – Brokerage Practices .....	8
Item 13 – Review of Accounts .....	9
Item 14 – <i>Client</i> Referrals and Other Compensation .....	9
Item 15 – Custody.....	9
Item 16 – Investment Discretion .....	10
Item 17 – Voting <i>Client</i> Securities.....	10
Item 18 – Financial Information.....	10
Item 19 – Requirements for State-Registered Advisers.....	11
Brochure Supplement(s)	

## Item 4 – Advisory Business

Financial Mountain Inc. was founded in 1991 by Robert Zimberg. There are currently four associates including two Certified Financial Planner™ designees, one Certified Public Accountant and two administrative staff. The firm is federally registered with the SEC (Securities and Exchange Commission) as a Registered Investment Adviser.

Financial Mountain Inc. provides personal financial planning and investment management to individuals, families and their related entities, trusts and estates, and family businesses. Financial Mountain Inc. works with clients to define financial objectives and to develop strategies for reaching those objectives, some of which may include: identification of financial problems, cash flow and budget management, tax planning, risk exposure review, investment management, education funding, retirement planning, estate planning, charitable goals, special needs planning, family business succession issues, fringe benefits, and/or other issues specific to the client.

The firm's compensation is solely from fees paid directly by clients. The firm does not receive commission based on the client's purchase of any financial product, including insurance. No commissions in any form are accepted. No referral fees are paid or accepted. No benefits are received from custodians/broker-dealers based on client securities transactions ("soft dollar benefits").

Assets under the direct management of Financial Mountain Inc. are held by independent custodians, in the client's name. Financial Mountain Inc. does not act as a custodian of client assets, although we may at times be considered by the SEC to technically have "custody" over certain types of accounts held at independent custodians.

We may recommend other professionals (e.g., lawyers, accountants, insurance agents, real estate agents, etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis even when recommended by the Advisor. Conflicts of interest will be disclosed to the client and managed in the best interest of the client.

Financial Mountain Inc. will engage in investment and financial growth strategies and all types of financial investments. Generally, these investments are stocks and bonds, exchange-traded funds (ETFs), money markets, and mutual funds both domestic and foreign.

Other investments will be discussed provided the client is qualified to engage in the specific investment, such as managed stock accounts, managed commodities accounts, options and other similar investments.

Financial Mountain Inc. does not require a client to have or maintain a minimum balance. Financial Mountain Inc. is a fee-only planning service. This precludes any potential conflict of interest common with other financial consultants, stockbrokers and insurance agents. Fees will be addressed in the letter of engagement.

Clients of Financial Mountain Inc. will be reviewed as discussed in our letter of engagement; however, at least a quarterly review of the client's situation is recommended.

### **Managed Assets:**

As of December 31, 2010 Financial Mountain Inc. managed approximately \$54,485,000 in assets for about 520 accounts for approximately 125 client households and entities.

### **Item 5 – Fees and Compensation**

Investment supervisory services are provided at a fee range of 1% to 3% of assets under management. This fee is payable quarterly in advance. Investment amounts managed over one million are negotiable. Normal minimum annual fee is \$1500 per year or \$375 per quarter. Some clients may pay different fees for similar services. Refund of investment advisory service fees are available on a prorated basis upon written requested. A retainer of \$750 is required to engage this service.

Financial planning services are included for accounts with a value of \$500,000 or more. For accounts under \$500,000, an hourly fee is charged with a minimum retainer fee for this service of \$750. The average fee for a comprehensive financial plan is \$1500. Some clients may pay different fees for similar services. No refund is available for financial planning services provided. Special needs financial planning fees are negotiable. Minimum fees may be waived on an individual basis.

All fees are subject to negotiation.

The specific manner in which Financial Mountain Inc. charges fees is established in a client's written agreement with Financial Mountain Inc. Financial Mountain Inc. will generally bill its fees on a quarterly basis. Clients will be billed in advance each calendar quarter. Clients may also elect to be billed directly for fees or to authorize Financial Mountain Inc. to directly debit fees from client accounts. Management fees shall not be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Financial Mountain Inc.'s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which shall be incurred by the client. Clients may

incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Financial Mountain Inc.'s fee, and Financial Mountain Inc. shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that Financial Mountain Inc. considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

Financial Mountain Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

### **Item 7 – Types of Clients**

Financial Mountain Inc. provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, municipalities, registered mutual funds, private investment funds, trust programs, sovereign funds, and other U.S. and international institutions.

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

Investing in securities involves risk of loss that clients should be prepared to bear.

We employ Modern Portfolio management techniques, which are concerned with investment analysis, portfolio design, and performance evaluation. These methods express quantitatively our views regarding risk and its relationship to investment return. They focus attention on the overall composition of the portfolio rather than the traditional

method of analyzing and evaluating the individual components. As your adviser, we are therefore able to examine and design portfolios predicated on explicit risk-reward parameters and on the identification and quantification of portfolio objectives.

## OUR APPROACH TO ASSET ALLOCATION

Simply stated, asset allocation is the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. Risk tolerance is essentially the percentage of an investment portfolio that an investor is willing to risk to achieve a specific rate of return. It is no longer a one-dimensional process of selecting the right stock, bond or property to place in a portfolio.

Financial Mountain Inc. utilizes a *risk-first* approach to investment analysis. Our investment belief is that investors are inherently risk-averse and proper risk management is paramount in asset selection. Financial Mountain Inc. analyzes funds using ulcer index (UI) and Ulcer-Performance Index (UPI). Ulcer Index (UI) is the co-variance of the downside of an asset or asset class. These tools allow Financial Mountain Inc. to determine the best funds according to our low-risk standards and to maximize return, relative to an asset's risk level.

Financial Mountain Inc.'s investment philosophy is based on the premise that nobody can accurately predict future events over the long term. Financial Mountain Inc. does not try to out-guess the markets or forecast future economic events, but rather seeks to invest assets in carefully chosen, diverse and "non-correlated" investment categories. Such diversification seeks to provide balance, liquidity and profit potential combined with the additional benefits of international diversification and tax planning. Diversification does not assure a profit nor protect against a loss in a declining market.

Despite our defensive, managed-risk style of investing, investing in securities involves risk of loss that clients should be prepared to bear. Investments are not guaranteed and the client may lose money. The principal investment risks include, but are not limited to:

- *Market Risk* – the risk that prices of securities will fluctuate sometimes rapidly and unexpectedly. These fluctuations may cause the price of a security to decline for short or long-term periods and cause the security to be worth less than it was worth when purchased.
- *Security Selection Risk* – securities selected by the advisor may perform differently than expected.

- *Risks of Investing in Foreign and Emerging Markets* – investments in foreign securities involve risk that are in addition to the risks associated with domestic securities. Securities of some foreign issuers may be less liquid and more volatile than securities of comparable U.S. companies and foreign stock markets may not be as developed or as efficient as those in the United States. In general, there is less overall governmental supervision and regulation of securities exchanges, brokers, banks and listed companies; less publicly available information about securities; and accounting and auditing standards often may be less strict and less reliable than in the United States. Foreign securities also have risks related to economic and political developments abroad, including expropriations, confiscatory taxation, exchange control regulation, limitations on the use or transfer of assets and any effects of foreign, social, economic or political instability. Investments in foreign assets are also subject to currency risk, *i.e.*, the risk that changes in the exchange rate between currencies will adversely affect the value (in U.S. dollar terms) of an investment. Investing in emerging (less developed) markets may involve higher levels of each of these risks.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Financial Mountain Inc. or the integrity of Financial Mountain Inc.'s management. Financial Mountain Inc. has no information applicable to this Item.

## **Item 10 – Other Financial Industry Activities and Affiliations**

None of the management persons with Financial Mountain Inc. are registered or have an application pending as a broker-dealer or a representative of a broker-dealer. None of the management persons are registered or have an application pending as a futures commission merchant, commodity pool operator or commodity trading advisor. There are no relationships or arrangements with broker-dealers, municipal securities traders, government securities dealers, investment companies or pooled investment vehicles,



mutual funds, hedge funds, closed-end investment companies, investment trusts, private investment companies, offshore funds, banking or thrift institutions, accountants or accounting firms, lawyers or law firms, real estate brokers or dealers, or sponsors/syndicators of limited partnerships that may create a conflict of interest with clients of Financial Mountain Inc.

Financial Mountain Inc. may recommend professional services to clients for legal, accounting, or real estate services but receives no compensation either directly or indirectly from referrals or recommendations. This service creates no conflict of interest with clients and therefore Financial Mountain Inc. has no information applicable to this item.

### **Item 11 – Code of Ethics**

Financial Mountain Inc. has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. Financial Mountain Inc. has adopted the CFP Board's Code of Professional Conduct as well as the NAPFA Code of Ethics. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor-mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Financial Mountain Inc. must acknowledge the terms of the Code of Ethics annually, or as amended.

Financial Mountain Inc. anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Financial Mountain Inc. has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Financial Mountain Inc., its affiliates and/or clients, directly or indirectly, have a position of interest. Financial Mountain Inc.'s employees and persons associated with Financial Mountain Inc. are required to follow Financial Mountain Inc.'s Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Financial Mountain Inc. and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Financial Mountain Inc.'s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Financial Mountain Inc. will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities

have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Financial Mountain Inc.'s clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Financial Mountain Inc. and its clients.

Financial Mountain Inc.'s clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Robert Zimberg at [bob@financialmountainonline.com](mailto:bob@financialmountainonline.com) or by telephone at (303) 351-1517.

It is Financial Mountain Inc.'s policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Financial Mountain Inc. will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

No preferential treatment is given to employee or access person accounts. Employee and access person account securities are reviewed monthly along with the securities of client accounts.

Client risk tolerance governs client portfolios. Client portfolio's are allocated according to specific client risk tolerances and goals which may be different than employee and access person therefore employee and access person accounts may or may not include securities that are purchased or held by clients. Securities are not purchased based on inside information that may be disclosed by clients. Consequently, trading patterns may be different than that of clients.

Employee personal accounts are available for review by auditors.

Block trades are not made because each client account is managed on an individual basis. Thus, there is no program for allocation of trades.

The fact that employees of Financial Mountain may own, buy or sell securities that client may own is disclosed to client in client agreement

Advisor keeps a record of the names of their access person, the holdings and transaction reports made by access person, and records of decisions approving access person acquisition of securities in IPOs and limited offerings.

Financial Mountain has never purchased IPO's or limited offerings for its employees, access persons or clients nor does it intend to in the future.

## **Item 12 - Brokerage Practices**

Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

Client is requested to sign a Limited Trading Authorization with Fidelity Institutional authorizing advisor to place orders directly with Fidelity Institutional assets (broker) for client's account. Client may terminate this authorization at any time by written notice to broker. Broker provides no advice or research services to either client or advisor.

Broker is chosen on the availability of a wide variety of No-load and Low-load mutual funds offered through broker, reasonable fees for transactions, and electronic data transmission services and practice management services made available by broker to enhance the efficiency of advisors office operations.

Although it is possible that lower transaction fees are available elsewhere, advisor believes that the products and services available to advisor and client by broker justify the transaction fees. Advisor believes that broker offers the best execution of orders among brokers that offer the required products and services.

If client directs advisor to use a broker or dealer other than Fidelity Investments, or other brokers that Financial Mountain has set up an institutional relationship with, Advisor may not be able to negotiate transaction fees or to obtain volume discounts or be assured of best execution efforts. Such direction may render account handling impractical.

Financial Mountain did not direct any trades to any other brokers in the last year. Financial Mountain did not receive any services of value from any other brokers in the last year.

### **Item 13 – Review of Accounts**

All client accounts are reviewed at a minimum of a quarterly basis. The frequency of account reviews is negotiated with each individual client. All clients are provided with quarterly reports that include asset allocation, performance reporting, and more. Additional reporting and account reviews can be provided to the client as needed.

Robert Zimberg reviews all client accounts prior to distribution. Reviews may be conducted by another employee of Financial Mountain Inc or by a supervised person, but Robert Zimberg always performs a final review of client accounts.

Additional account reviews may be performed when requested by clients, when a client's situation or investment objective changes, or when market conditions dictate. Additionally, events such as tax-law changes or important global events may trigger additional account reviews.

Assets held by clients are reviewed on an ongoing basis to ensure continued performance of holdings. Assets may be added or removed from client accounts if performance or technical data change.

### **Item 14 – *Client Referrals and Other Compensation***

Financial Mountain Inc. periodically receives referrals from clients, accountants, estate-planning attorneys, employees, personal friends and other sources. This firm does not pay for any referrals.

Financial Mountain Inc. does not accept referral fees or any form of remuneration from other professionals or individuals when a client or prospect is referred.

### **Item 15 – Custody**

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Financial Mountain

Inc. urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16 – Investment Discretion**

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

When selecting securities and determining amounts, Financial Mountain Inc. observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Financial Mountain Inc.'s authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Financial Mountain Inc. in writing.

## **Item 17 – Voting *Client* Securities**

As a matter of firm policy and practice, Financial Mountain Inc. does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Financial Mountain Inc. may provide advice to clients regarding the clients' voting of proxies.

## **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Financial Mountain Inc.'s financial condition. Financial Mountain Inc. has no financial commitment that impairs its ability to meet

contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

### **Business Continuity Plan:**

Financial Mountain Inc. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people. The Business Continuity Plan covers man-made and natural disasters as well as many other events that could impact or impair normal business operations. Files are back up daily and archived on- and offsite.

### **Item 19 – Requirements for State-Registered Advisers**

A Certified Financial Planner (CFP) or Certified Public Account (CPA) license is required for any employee of Financial Mountain Inc to determine or give investment advice to clients. Robert D. Zimberg and Mark Adolfson are both CFP licensees. Gale A. Pittenger is a Certified Public Accountant (CPA). Financial planning services are completed by a CFP.

Robert D. Zimberg Birth Date 8/29/1960  
University of Colorado Boulder - 1976-1980 MCDB Biology  
Certified Financial Planner (CFP) Licensed November 30,1992  
Member of National Association of Personal Financial Planners (NAPFA)  
Passed CFA (Chartered Financial Analyst) Level 1  
President of Financial Mountain Inc from 1991 to present

Mark H. Adolfson Birth Date: 1/15/1956  
Fort Lewis College, Durango, CO - 9/1976 to 5/1978  
University of Colorado Boulder - 9/1981 to 5/1984 Geology  
Certified Financial Planner (CFP) Licensed November 30,1995  
Financial Planner and Investment Advisor with Financial Mountain since November 1995

Gale Alan Pittenger Birth Date: 9/29/1947  
Lehigh University 1965-1969 - Graduated 1969 BA in Accounting  
Certified Public Accountant, Colorado Board of Accountancy, certificate #3624 6/24/1975  
passed 11/1973  
President of Pittenger and Associates, PC from 2010 to present

President of Pittenger, Gracey, Dudden PC from 1995 to 2010  
President of Pittenger and Associates, PC from 1974 to 1995

**Brochure Supplement (Part 2B of Form ADV)**

Supervised Persons

Reid A. McIntyre  
Financial Mountain Inc.  
Post Office Box E  
Boulder, CO 80306  
(303) 351-1517

As of February 18, 2011

**This Brochure Supplement provides information about Reid A. McIntyre that supplements the Financial Mountain Inc. Brochure. You should have received a copy of that Brochure. Please contact Robert Zimberg (president) if you did not receive Financial Mountain Inc.'s Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Reid A. McIntyre is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



## **Item 2- Educational Background and Business Experience**

Reid A. McIntyre  
Born November 15, 1979

Reid McIntyre holds a degree in Economics from the University of Colorado at Boulder. Mr. McIntyre has been involved in many start-up businesses and has extensive experience in equity and bond markets. Mr. McIntyre has provided consultation services for entrepreneurs and assisted in the locating and securing of private financing for small and start-up businesses.

Reid McIntyre has been with Financial Mountain Inc. for over 5 years and currently serves as Operations Manager and Junior Portfolio Manager.

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4- Other Business Activities**

The *supervised person* (Reid A. McIntyre) does not actively engage in other investment-related business that creates any material conflict of interest. No information is applicable to this item.

## **Item 5- Additional Compensation**

The *supervised person* does not receive commissions, bonuses, or other compensation based on the sale of securities or other investment products including as a broker-dealer or registered representative. The *supervised person* receives no distribution of service (“trail”) fees from the sale of mutual funds or any investment products.

Reid A. McIntyre has a pre-negotiated fixed compensation package with Financial Mountain Inc. and receives additional compensation for additional assets under management. Mr. McIntyre’s compensation structure creates no material conflicts of interest for Financial Mountain Inc. or its clients.

## **Item 6 - Supervision**

Robert Zimberg currently supervises Reid A. McIntyre. Mr. Zimberg is the President of Financial Mountain Inc. and provides direct supervision to Mr. McIntyre.

Reid McIntyre's Contact Information:

Phone: (303) 351-1517

Email: [reid@financialmountainonline.com](mailto:reid@financialmountainonline.com)