

Trademark Capital Management, Inc.

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Brochure

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This brochure provides information about the qualifications and business practices of Trademark Capital Management, Inc. (the “Registrant”). If you have any questions about the contents of this brochure, please contact us at (727) 848-8950 or DCampbell@trademarkcapital.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.

Additional information about Trademark Capital Management, Inc. also is available on the SEC’s website at www.adviserinfo.sec.gov.

References herein to Trademark Capital Management, Inc. as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.

Item 2 – Material Changes

No material changes in 2011.

Item 3 – Table of Contents

Item 1	Cover Page.....	1
Item 2	Material Changes.....	2
Item 3	Table of Contents.....	3
Item 4	Advisory Business	4
Item 5	Fees and Compensation	7
Item 6	Performance-Based Fees and Side-by-Side Management	11
Item 7	Types of Clients.....	11
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Item 9	Disciplinary Information	12
Item 10	Other Financial Industry Activities and Affiliations	13
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	14
Item 12	Brokerage Practices	16
Item 13	Review of Accounts.....	18
Item 14	Client Referrals and Other Compensation	18
Item 15	Investment Discretion	19
Item 16	Voting Client Securities.....	19
Item 17	Financial Information	20

Item 4 – Advisory Business

- A. Trademark Capital Management Inc. (the “Registrant”) is a corporation formed on July 3, 1995 in the State of Florida. The Registrant became registered as an Investment Adviser Firm in November 1999. The Registrant is principally owned by Steve Athanassie and Joseph Ezernack. Dorothy Campbell and Donald Beasley are the Registrant’s Principals.
- B. As discussed below, the Registrant offers to its clients (individuals, business entities, pension and profit sharing plans, trusts, estates and charitable organizations, etc.) investment advisory services, and, to the extent specifically requested by a client, financial planning and related consulting services.

INVESTMENT ADVISORY SERVICES

The Registrant provides wealth management services to individual clients and business entities through its Trademark Capital Private Client division.

Asset Management Services for Individuals and Institutions

The client can determine to engage the Registrant to provide discretionary and/or non-discretionary investment advisory services on a *fee* basis. The Registrant’s annual investment advisory fee is based upon a percentage (%) of the market value of the assets placed under the Registrant’s management between negotiable and 1.25%. The following tiered fee schedules apply to the total value of the client assets under management. As the client’s account value exceeds each tier, the portion of the account in excess of each tier will be billed at the next tier’s rate.

Discretionary Basis

<u>Market Value of All Assets Under Management</u>	<u>% of Assets</u>
On the first \$500,000	1.25%
On the next \$4,500,000	1.00%
Above \$5,000,000	0.75%

Registrant's annual Asset Management fee shall include investment advisory services, and, to the extent specifically requested by the client, financial planning and consulting services. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of the Registrant), the Registrant may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client.

Collective Investment Funds. The Registrant also serves as the investment adviser to various collective investment funds (each reflecting a different investment strategy) sponsored by Hand Benefits & Trust Company (HB&T), a state-chartered trust company regulated by the Texas Department of Banking. Collective funds represent a pooled group of accounts that are combined to create a larger, well-diversified portfolio, typically a fund of grouped assets contributed by pension, profit sharing, retirement, or other trusts that are exempt from federal income tax. These pooled funds are grouped into what is commonly referred to as a master trust account under the control of the fund custodian (here HB&T) which acts as the administrator. The Registrant generally receives an investment management fee between 0.35% and 0.80% for services rendered to the collective investment funds.

Item 4 – Advisory Business

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent specifically requested by a client, the Registrant *may* determine to provide financial planning and/or consulting services on a stand-alone separate fee basis. The Registrant offers three distinct financial planning/consulting service agreements from which the client is free to choose.

Prior to engaging the Registrant to provide planning or consulting services, clients are generally required to enter into a written agreement with the Registrant setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Registrant commencing services. If requested by the client, Registrant may recommend the services of other professionals for implementation purposes, including the Registrant's representatives in their individual capacities as licensed insurance agents. (*See* disclosure at Item 10 C.8). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client's responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

Comprehensive Family Office ("CFO") Wealth Management Solution

Clients may engage the Registrant to provide its CFO Wealth Management Solution service. The Registrant's fee for this service is based upon the client's current net worth. The Registrant's CFO Wealth Management Solution service *may* include the following:

Tax Compliance, Planning & Preparation	Estate & Wealth Transfer Planning
Investment Policy & Asset Allocation	Trust Services & Management
Portfolio Strategy & Manager Selection	Insurance & Risk Management
Investment Performance Monitoring	Debt Structuring & Analysis
Portfolio Accounting & Tax Reporting	Charitable Donations
Cash Flow Planning	Personal Financial Statement Preparation
Multi-Generational Wealth Planning	Data & Document Management

OnTrack Coach™

The Registrant *may* offer module financial planning that includes one of the following consultant services: cash flow analysis and coaching, retirement planning, risk protection planning or estate planning. The fee assessed is an initial flat fee and a quarterly ongoing fee.

Hourly Consultation

The Registrant *may* determine to provide various levels of consulting services on an hourly fee basis. Registrant's planning and consulting fees are negotiable, but generally range from \$75 to \$225 on an hourly rate basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s)

RETIREMENT PLAN ADVISORY SERVICES

The Registrant provides advisory services to ERISA retirement plans.

Item 4 – Advisory Business

The Retirement Director

If engaged to provide this service, the Registrant shall provide some or all of the following services to the Plan Sponsor:

- The Registrant shall conduct a comprehensive review of a 401k plan and then benchmark it against industry averages.
- The Registrant shall implement a multi-step process to help the Plan Fiduciary carry out its fiduciary responsibility to monitor the Plan's investments. Establishing a sound fiduciary governance process is vital to good decision-making and to documenting that prudent procedural steps are followed in making investment decisions.
- The Registrant shall provide financial education to all levels of employees of the Plan Sponsor, regardless of their participation in the Plan, to enable them to confidently accumulate and manage their savings toward their retirement.
- The Registrant shall consult with the Plan Fiduciary to make an informed and knowledgeable vendor selection decision. The fees for this service are assessed on an hourly basis.

Additionally, the Registrant shall act as co-fiduciary providing investment advice within the meaning of ERISA § 3(21)(A)(ii) to the Plan Fiduciary when advising the Plan Fiduciary and/or the Retirement Plan or Investment Committee on investment management issues. To the extent that the Service Provider exercises discretionary authority or control over the management or disposition of the Plan assets, the Service Provider is also an investment manager within the meaning of ERISA § 3(38). The fee for this service is a tiered-asset base schedule based on the asset in the Plan.

MISCELLANEOUS ADVISORY SERVICES

Non-Investment Consulting/Implementation Services. To the extent requested by the client, the Registrant *may* provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Neither the Registrant, nor any of its representatives, serves as an attorney or accountant and no portion of the Registrant's services should be construed as same. To the extent requested by a client, the Registrant may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.), including representatives of the Registrant in their separate licensed capacities as discussed below. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client's responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

Please Note: Liquidation of Securities to Pay Advisory Fees. In the event that the Registrant's advisory fees are due and the client's advisory account does not contain sufficient funds to pay those advisory fees, the Registrant shall have authority to sell/redeem/liquidate securities held in the client's portfolio, in sufficient amounts, to pay the Registrant's then due advisory fees.

Item 4 – Advisory Business

Client Obligations. In performing its services, Registrant shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

Disclosure Statement. A copy of the Registrant's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the *Asset Management Agreement or Financial Planning and Consulting Agreement*. Any client who has not received a copy of Registrant's written Brochure at least 48 hours prior to executing the *Asset Management Agreement or Financial Planning and Consulting Agreement* shall have five business days subsequent to executing the agreement to terminate the Registrant's services without penalty.

- C. The Registrant shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, the Registrant shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at anytime, impose reasonable restrictions, in writing, on the Registrant's services.
- D. The Registrant does not participate in a wrap fee program.
- E. As of December 31, 2011, the Registrant had \$101,082,629 in assets under management on a discretionary basis.

Item 5 – Fees and Compensation

- A. The client can determine to engage the Registrant to provide discretionary and/or non-discretionary investment advisory services on a *fee* basis.

INVESTMENT ADVISORY SERVICES

Asset Management Services for Individuals and Institutions

The client can determine to engage the Registrant to provide discretionary investment advisory services on a *fee* basis. The Registrant's annual investment advisory fee is based upon a percentage (%) of the market value of the assets placed under the Registrant's management between negotiable and 1.25%. The following tiered fee schedules apply to the total value of the client assets under management. As the client's account value exceeds each tier, the portion of the account in excess of each tier will be billed at the next tier's rate.

<u>Market Value of All Assets Under Management</u>	<u>% of Assets</u>
On the first \$500,000	1.25%
On the next \$4,500,000	1.00%
Above \$5,000,000	0.75%

Item 5 – Fees and Compensation

Registrant's annual Asset Management fee shall include investment advisory services, and, to the **extent specifically requested** by the client, financial planning and consulting services. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of the Registrant), the Registrant may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client.

Collective Investment Funds.

The Registrant generally receives an investment management fee between 0.35% and 0.60% for services rendered to the collective investment funds.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent specifically requested by a client, the Registrant *may* determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone fee basis. The Registrant offers three distinct financial planning/consulting service agreements from which the client is free to choose.

Comprehensive Family Office (“CFO”) Wealth Management Solution

Clients may engage the Registrant to provide its CFO Wealth Management Solution service. The Registrant's fee for this service is based upon the client's current net worth. The fee schedule is as follows:

<u>Net Worth</u>	<u>1st Year Advisory Fee</u>	<u>2nd & 3rd Year Advisory Fee</u>
Up to \$700,000	\$3,500	\$3,125
\$700,000 - \$800,000	\$4,100	\$3,725
\$800,000 - \$1,000,000	\$4,875	\$4,475
\$1,000,000 - \$1,200,000	\$5,750	\$5,225
\$1,200,000 - \$1,600,000	\$6,750	\$6,125
\$1,600,000 - \$2,000,000	\$8,250	\$7,625
\$2,000,000 - \$2,500,000	\$10,000	\$9,250
\$2,500,000 - \$3,000,000	\$11,500	\$10,750
\$3,000,000 - \$3,500,000	\$13,250	\$12,250
\$3,500,000 - \$4,000,000	\$15,000	\$13,750
\$4,000,000 - \$4,500,000	\$15,750	\$14,750
\$4,500,000 - \$5,000,000	\$16,750	\$15,750
\$5,000,000 - \$5,750,000	\$18,000	\$16,750
\$5,750,000 - \$6,500,000	\$18,750	\$17,500
\$6,500,000 - \$7,250,000	\$19,500	\$18,250
\$7,250,000 - \$8,000,000	\$20,000	\$18,500
\$8,000,000 - \$9,000,000	\$20,250	\$19,000
\$9,000,000 - \$10,000,000	\$20,500	\$19,500
\$10,000,000 & Above	Negotiable	

*Net Worth includes investment assets over which there is control, such as investment accounts, 401(k)s, 403(b)s, vested stock options, rental properties, 2nd homes, etc. Excluded are personal residence and tangible personal property such as vehicles, jewelry, etc.

Item 5 – Fees and Compensation

Additional fees may apply to business owners and self-employed for tax preparation and accounting services. The fees could range between \$250–\$2,500 depending upon the extent of the work involved.

The Registrant's fee will be assessed quarterly pro-rata to the date the CFO Wealth Management agreement is signed. Thereafter, the advisory fee will be payable quarterly, in advance. The advisory fee may be adjusted at the end of three years and every three years thereafter based on Trademark Capital's formula at that time. The client shall receive written notice before the implementation of fee increase.

Hourly Consultation

The Registrant *may* determine to provide various levels of consulting services on an hourly fee basis. Fee's generally range from \$75 to \$225 on an hourly rate basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s). The Registrant's hourly fees are due upon completion of the services or on a monthly basis, whichever occurs first. Fees are not negotiable and are charged in accordance with the fee schedule below.

Certified Financial Planner (CFP) and Accredited Investment Fiduciary (AIF)	\$225 per hour
Registered Paraplanner (RP)	\$165 per hour
Research Project Associate	\$ 75 per hour

RETIREMENT PLAN ADVISORY SERVICES

The Retirement Director

If engaged to provide this service, the Registrant shall provide all the services described above to the Plan Sponsor. Additionally, the Registrant shall act as co-fiduciary providing investment advice within the meaning of ERISA § 3(21)(A)(ii) to the Plan Fiduciary when advising the Plan Fiduciary and/or the Retirement Plan or Investment Committee on investment management issues. To the extent that the Service Provider exercises discretionary authority or control over the management or disposition of the Plan assets, the Service Provider is also an investment manager within the meaning of ERISA § 3(38). The fee for this service is a tiered-asset base schedule based on the asset in the Plan.

Value of Plan Assets under Management	3(21) Annual Fee	3(38) Annual Fee
The first \$3,000,000	0.50%	0.60%
The next \$7,000,000	0.12%	0.15%
The next \$20,000,000	0.10%	0.12%
Above \$30,000,000	Negotiable	Negotiable

The annual minimum fee is \$7,500 for this service.

- B. Clients may elect to have the Registrant's advisory fees deducted from their custodial account. Both Registrant's *Asset Management Agreement* and the custodial/ clearing agreement may authorize the custodian to debit the account for the amount of the Registrant's investment advisory fee and to directly remit that management fee to the Registrant in compliance with regulatory procedures. In the limited event that the Registrant bills the client directly, payment is due upon receipt of the Registrant's invoice. The Registrant shall deduct fees and/or bill clients quarterly in advance, based upon the market value of the assets on the last business day of the previous quarter.
- C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, the Registrant shall generally recommend that Charles Schwab and Co., Inc.

Item 5 – Fees and Compensation

(“*Schwab*”), Fidelity Investments (“*Fidelity*”), National Advisors Trust Co. (“*NATC*”) and/or TD Ameritrade serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab*, *Fidelity*, *NATC* and *TD Ameritrade* charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition to Registrant’s investment management fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). (*See* additional disclosure below concerning Mr. Athanassie’s indirect ownership interest in *NATC*).

- D. Registrant's annual investment advisory fee shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. The Registrant does not generally require an annual minimum fee or asset level for investment advisory services. The Registrant, in its sole discretion, may charge a lesser investment management fee based upon certain criteria. (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.). The initial management fee payment will be prorated for the initial period from the date that the *Asset Management Agreement* was signed. When additional assets are deposited into a client’s account, the Registrant’s shall charge a pro-rata fee for these additional assets based upon the number of days remaining in the billing quarter.

The *Asset Management Agreement* between the Registrant and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Asset Management Agreement*. Upon termination, the Registrant shall refund the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing quarter. No fee adjustments shall be made for partial withdrawals during the final quarter of service.

- E. Neither the Registrant, nor its representatives accept compensation from the sale of securities or other investment products.

Item 6 – Performance Based Fees and Side-by-Side Management

Neither the Registrant nor any supervised person of the Registrant accepts performance-based fees.

Item 7 – Types of Clients

The Registrant's clients shall generally include individuals, business entities, pension and profit sharing plans, trusts, estates and charitable organizations. The Registrant does not generally require an annual minimum fee or asset level for investment advisory services. The Registrant, in its sole discretion, may charge a lesser investment management fee based upon certain criteria. (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

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

A. The Registrant may utilize the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

The Registrant may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)

Please Note: Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Registrant) will be profitable or equal any specific performance level(s).

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

- B. The Registrant's methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis the Registrant must have access to current/new market information. The Registrant has no control over the dissemination rate of market information; therefore, unbeknownst to the Registrant, certain analyses may be compiled with outdated market information, severely limiting the value of the Registrant's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

The Registrant's primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period, involves a very short investment time period but will incur higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs than a longer term investment strategy.

- C. Currently, the Registrant primarily allocates client investment assets among various individual equity (stocks), debt (bonds) and fixed income securities, mutual funds and/or exchange traded funds on a discretionary and non-discretionary basis in accordance with the client's designated investment objective(s).

Item 9 – Disciplinary Information

The Registrant has not been the subject of any disciplinary actions.

Item 10 – Other Financial Industry & Affiliations

- A. Neither the Registrant, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither the Registrant, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

C.

1. **Indirect Ownership Interest In NATC.** Steve Athanassie, a Principal of the Registrant, has a less than one percent (1.00%) ownership interest in a savings and loan company, National Advisors Holdings, Inc. (“NAH”), that has formed a federally chartered trust company, National Advisors Trust Company (“NATC”). NAH and NATC are regulated by the Office of Thrift Supervision. The trust company provides a low-cost alternative to traditional trust service providers. The Registrant intends to refer clients to NATC for trust services.

Conflict of Interest: The recommendation by the Registrant that a client engage the trust services of NATC presents a *conflict of interest*, as the receipt of residual compensation, by Mr. Athanassie, as an indirect owner of NATC, may provide an incentive to recommend NATC’s trust services, rather than on a particular client’s need. No client is obligated to engage NATC’s trust services and clients are reminded that they may engage the trust services of other, non-affiliated trust companies. **The Registrant’s Chief Compliance Officer, Dorothy Campbell, remains available to address any questions that a client or prospective client may have regarding the above conflicts of interest.**

2. **Related Collective Investment Funds/Conflict of Interest.** The Registrant provides investment advisory services to the Trademark Capital Target Retirement funds a series of Collective Investment Trusts through Hand Benefit & Trust. HB&T compensates the Registrant with a management fee of 0.35% to 0.60%. The Registrant may purchase the CIFs for client accounts. If the Registrant is receiving fiduciary advisory compensation, the client will receive a fee offset equal to the management fee received from HB&T for the client’s investment in the CIFs. **Any client that wishes to direct the Registrant not to purchase the Fund for his/her/its account is requested to advise the Registrant of such direction, in writing. In the event that any client has questions regarding the Fund and/or any corresponding perceived conflict of interest that the purchase of Fund for a client’s account may present, he/she/it is encouraged to speak with the Registrant’s Chief Compliance Officer, Dorothy Campbell.**
3. **Accounting Firm.** The Registrant’s Principal, Steve Athanassie, is also the Principal of the accounting firm Trademark Capital Tax & Accounting Services, Inc. To the extent that a client specifically requests accounting advice and/or tax preparation services, the Registrant may recommend the services of the accounting firm Trademark Capital Tax & Accounting Services, Inc. Any such accounting advice and/or tax preparation services shall be rendered independent of the Registrant pursuant to a separate agreement between the client and the accounting firm. The Registrant shall not receive any of the fees charged by the accounting firm, referral or otherwise.

Conflict of Interest: The recommendation by Registrant’s representatives that a client engage the services of Trademark Capital Tax & Accounting Services, Inc., presents a

Item 10 – Other Financial Industry & Affiliations

conflict of interest. No client is under any obligation to engage the services of the accounting firm Trademark Capital Tax & Accounting Services, Inc. **The Registrant's Chief Compliance Officer, Dorothy Campbell, remains available to address any questions that a client or prospective client may have regarding the above conflicts of interest.**

4. **Licensed Insurance Agents.** Steve Athanassie and Dorothy Campbell in their individual capacities, are licensed insurance agents, and may recommend the purchase of certain insurance-related products on a commission basis. As referenced in Item 4 B above, clients can engage certain of Registrant's representatives to purchase insurance products on a commission basis.

Conflict of Interest: The recommendation by either Steve Athanassie and Dorothy Campbell that a client purchase an insurance commission product presents a ***conflict of interest***, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Steve Athanassie and Dorothy Campbell. Clients are reminded that they may purchase insurance products recommended by Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dorothy Campbell, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

- D. The Registrant does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

- A. The Registrant maintains an investment policy relative to personal securities transactions. This investment policy is part of Registrant's overall Code of Ethics, which serves to establish a standard of business conduct for all of Registrant's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, the Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Registrant or any person associated with the Registrant.

- B. Neither the Registrant nor any related person of Registrant recommends, buys, or sells for client accounts, securities in which the Registrant or any related person of Registrant has a material financial interest.
- C. The Registrant and/or representatives of the Registrant *may* buy or sell securities that are also recommended to clients. This practice may create a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if the Registrant did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the Registrant's clients) and other potentially abusive practices.

Item 12 – Brokerage Practices

- D. The Registrant has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the Registrant's "Access Persons". The Registrant's securities transaction policy requires that Access Person of the Registrant must provide the Chief Compliance Officer or his/her designee with a written report of the their current securities holdings within ten (10) days after becoming an Access Person.
- E. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Registrant selects; provided, however that at any time that the Registrant has only one Access Person, he or she shall not be required to submit any securities report described above.
- F. The Registrant and/or representatives of the Registrant *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11 C, the Registrant has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Registrant's Access Persons. The Registrant maintains an investment policy relative to personal securities transactions. This investment policy is part of Registrant's overall Code of Ethics, which serves to establish a standard of business conduct for all of Registrant's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, the Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Registrant or any person associated with the Registrant.

- G. Neither the Registrant nor any related person of Registrant recommends, buys, or sells for client accounts, securities in which the Registrant or any related person of Registrant has a material financial interest.
- H. The Registrant and/or representatives of the Registrant *may* buy or sell securities that are also recommended to clients. This practice may create a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if the Registrant did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the Registrant's clients) and other potentially abusive practices.

The Registrant has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the Registrant's "Access Persons". The Registrant's securities transaction policy requires that Access Person of the Registrant must provide the Chief Compliance Officer or his/her designee with a written report of the their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Registrant selects; provided, however that at any time that the Registrant has only one Access Person, he or she shall not be required to submit any securities report described above.

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

The Registrant and/or representatives of the Registrant *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11 C, the Registrant has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Registrant's Access Persons

Item 12 – Brokerage Practices

- A. In the event that the client requests that the Registrant recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct the Registrant to use a specific broker-dealer/custodian), Registrant generally recommends that investment management accounts be maintained at *Schwab, Fidelity, National Advisors Trust Company and TD Ameritrade*. Prior to engaging Registrant to provide investment management services, the client will be required to enter into a formal *Asset Management Agreement* with Registrant setting forth the terms and conditions under which Registrant shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that the Registrant considers in recommending *Schwab, Fidelity and National Advisors Trust Company and TD Ameritrade* (or any other broker-dealer/custodian to clients) include historical relationship with the Registrant, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Registrant's clients shall comply with the Registrant's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the Registrant determines, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Registrant will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Registrant's investment management fee. The Registrant's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

1. Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Registrant may receive from *Schwab, Fidelity, National Advisors Trust Company and TD Ameritrade* (or another broker-

Item 12 – Brokerage Practices

dealer/custodian) without cost (and/or at a discount) support services and/or products, certain of which assist the Registrant to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the Registrant may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Registrant in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist the Registrant in managing and administering client accounts. Others do not directly provide such assistance, but rather assist the Registrant to manage and further develop its business enterprise.

Registrant's clients do not pay more for investment transactions effected and/or assets maintained at *Schwab, Fidelity, NATC* and *TD Ameritrade* as a result of this arrangement. There is no corresponding commitment made by the Registrant to *Schwab, Fidelity, National Advisors Trust Company* and *TD Ameritrade* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

The Registrant's Chief Compliance Officer, Dorothy Campbell, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.

2. The Registrant does not receive referrals from broker-dealers
3. The Registrant does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Registrant will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Registrant. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Please Note: In the event that the client directs Registrant to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Registrant.

The Registrant's Chief Compliance Officer, Dorothy Campbell, remains available to address any questions that a client or prospective client may have regarding the above arrangement.

- B. To the extent that the Registrant provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless the Registrant decides to purchase or sell the same securities for several clients at approximately the same time. The Registrant may (but is not obligated to) combine or "bunch" such orders to

Item 12 – Brokerage Practices

obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Registrant's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. The Registrant shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 – Review of Accounts

- A. For those clients to whom Registrant provides investment supervisory services, account reviews are conducted on an ongoing basis by the Registrant's Principals and/or representatives. All investment supervisory clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with the Registrant on an annual basis.
- B. The Registrant may conduct account reviews on a periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The Registrant may also provide a written periodic report summarizing account activity and performance.

Item 14 – Client Referrals & Other Compensation

- A. As referenced in Item 12.A.1 above, the Registrant may receive an indirect economic benefit from *Schwab, Fidelity, National Advisors Trust Company and TD Ameritrade*. The Registrant, without cost (and/or at a discount), may receive support services and/or products from *Schwab, Fidelity and National Advisors Trust Company and TD Ameritrade*.
 - 1. Registrant's clients do not pay more for investment transactions effected and/or assets maintained at *Schwab, Fidelity, National Advisors Trust Company and TD Ameritrade* as a result of this arrangement. There is no corresponding commitment made by the Registrant to *Schwab, Fidelity, National Advisors Trust Company and TD Ameritrade* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

The Registrant's Chief Compliance Officer, Dorothy Campbell, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest any such arrangement may create.

Item 14 – Client Referrals & Other Compensation

- B. If a client is introduced to the Registrant by either an unaffiliated or an affiliated solicitor, Registrant *may* pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from the Registrant's investment management fee, and shall not result in any additional charge to the client. If the client is introduced to the Registrant by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of the Registrant's written Brochure with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between the Registrant and the solicitor, including the compensation to be received by the solicitor from the Registrant.

The Registrant shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The Registrant may also provide a written periodic report summarizing account activity and performance.

Please Note: To the extent that the Registrant provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by the Registrant with the account statements received from the account custodian. **Please Also Note:** The account custodian does not verify the accuracy of the Registrant's advisory fee calculation.

Item 15 – Investment Discretion

The client can determine to engage the Registrant to provide investment advisory services on a discretionary basis. Prior to the Registrant assuming discretionary authority over a client's account, client shall be required to execute an *Asset Management Agreement*, naming the Registrant as client's attorney and agent in fact, granting the Registrant full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage the Registrant on a discretionary basis may, at anytime, impose restrictions, **in writing**, on the Registrant's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the Registrant's use of margin, etc.).

Item 16 – Voting Client Securities

- A. The Registrant does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact the Registrant to discuss any questions they may have with a particular solicitation.

Item 17 – Financial Information

- A. The Registrant does not solicit fees of more than \$1,200, per client, six months or more in advance.
B. The Registrant is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
C. The Registrant has not been the subject of a bankruptcy petition.

ANY QUESTIONS: The Registrant's Chief Compliance Officer, Dorothy Campbell, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.

Part 2B of Form ADV: Brochure Supplement

Brochure Supplement – Steve Athanassie

Item 1 Cover Page

A.



Brochure Supplement Dated 6/30/2011

Contact: Dorothy Campbell, Chief Compliance Officer
5328 Trouble Creek Road
New Port Richey, Florida 34652

B.

This Brochure Supplement provides information about Steve Athanassie that supplements the Trademark Capital Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Dorothy Campbell, Chief Compliance Officer, if you did *not* receive Trademark Capital Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Steve Athanassie is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Steve Athanassie was born in 1963. Mr. Athanassie graduated from the University of South Florida in 1984 with a Bachelor's degree in Business and Finance. He graduated from the College of Financial Planning in 1988. He holds a Series 65 Uniform Investment Advisors license.

Mr. Athanassie founded Trademark Capital Management, Inc. in 1995. He is the Managing Principal, Chief Market Analyst and an Advisory Representative of Trademark Capital. Mr. Athanassie has been the President of Trademark Capital Tax & Accounting, Inc. since January 1999.

Mr. Athanassie holds the designation of Certified Financial Planner (CFP®) since 1988. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelors degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP Board.

Mr. Athanassie holds the designation of Accredited Investment Fiduciary® (AIF®) since 2007. The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF Code of Ethics. In order to maintain the AIF designation, the individual must annually renew their affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

Mr. Athanassie holds the designation of Accredited Tax Preparer (ATP) since 1999. The ATP designation identifies professionals who have knowledge of tax codes for individuals, corporations and partnerships. The Accreditation Council for Accountancy and Taxation awards the ATP designation to professionals who have at least three (3) years of tax preparation experience.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. **Licensed Insurance Agent.** Mr. Athanassie, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Athanassie to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Athanassie that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Athanassie. Clients are reminded that they may purchase insurance products recommended by Mr. Athanassie through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dorothy Campbell, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Dorothy Campbell, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Campbell at (727) 848-8950.

Part 2B of Form ADV: Brochure Supplement

Brochure Supplement – Dorothy Campbell

Item 1 Cover Page

A.



Brochure Supplement Dated 6/30/2011

Contact: Dorothy Campbell, Chief Compliance Officer
5328 Trouble Creek Road
New Port Richey, Florida 34652

B.

This Brochure Supplement provides information about Dorothy Campbell that supplements the Trademark Capital Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Dorothy Campbell, Chief Compliance Officer, if you did *not* receive Trademark Capital Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Dorothy Campbell is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Dorothy Campbell was born in 1963. Ms. Campbell attended Burlington County College from 1981 to 1983. Ms. Campbell graduated from the College of Financial Planning in 1999. She holds a Series 65 Uniform Investment Advisors license.

Ms. Campbell joined Trademark Capital Management, Inc. in 1998. She is a Principal, Chief Compliance Officer and an Advisory Representative of Trademark Capital.

Ms. Campbell holds the designation of Registered ParaplannerSM (RP[®]) since 1999. Individuals who hold the RP[®] designation have completed a course of study encompassing the financial planning process; the five disciplines of financial planning; and general financial planning concepts, terminology, and product categories. Additionally, individuals enrolled in the program, after passing the final exam, must complete a three-month long internship program in which they obtain verification from their immediate supervisor or employer documenting their mastery of the following financial planning-related skills:

- adequate verbal and communication skills;
- ability to use at least one type of financial planning software;
- ability to read and extract information for data gathering purposes from a client's financial documents, including insurance policies (life, medical, disability, property/liability), investment records, tax returns, wills/trusts, retirement, and property holding documents;
- ability to construct personal financial statements, including balance sheets (statement of financial position) and income statements; and
- ability to review and analyze information to identify basic strengths and weaknesses in a client's financial situation relating to risk management issues, investment issues, income tax issues, retirement issues, and general issues (e.g., emergency funds, level of debt, budgeting, saving patterns, net worth fluctuations).

Ms. Campbell holds the designation of Accredited Investment Fiduciary[®] (AIF[®]) since 2007. The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF Code of Ethics. In order to maintain the AIF designation, the individual must annually renew their affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. **Licensed Insurance Agent.** Ms. Campbell, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Campbell to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Ms. Campbell that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Ms. Campbell. Clients are reminded that they may purchase insurance products recommended by Ms. Campbell through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dorothy Campbell, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Dorothy Campbell, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Campbell (727) 848-8950.

Part 2B of Form ADV: Brochure Supplement
Brochure Supplement – Donald Lawrence Beasley

Item 1 Cover Page

A.



Brochure Supplement
Dated 6/30/2011

Contact: Dorothy Campbell, Chief Compliance Officer
5328 Trouble Creek Road
New Port Richey, Florida 34652

B.

This Brochure Supplement provides information about Donald Lawrence Beasley that supplements the Trademark Capital Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Dorothy Campbell, Chief Compliance Officer, if you did *not* receive Trademark Capital Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Donald Lawrence Beasley is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Donald Lawrence Beasley was born in 1942. Mr. Beasley graduated from Northwestern State University with a Bachelor's degree in Mathematics and Physical Education in 1965 and a Master's degree in Administration in 1966.

Mr. Beasley joined Trademark Capital Management, Inc. in January 2011. He is a Principal and an Advisory Representative of Trademark Capital. Mr. Beasley was the Principal of Athens Capital Management, LLC from July 2007 to January 2011. Mr. Beasley was Co-Founder and President of Personal Mutual Fund Management (Stadion Money) from June 1992 to May 2006. He holds a Series 65 Uniform Investment Advisors license.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Dorothy Campbell, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Campbell at (727) 848-8950.

Part 2B of Form ADV: Brochure Supplement

Brochure Supplement – Joseph Gerald Ezernack, II

Item 1 Cover Page

A.



Brochure Supplement
Dated 6/30/2011

Contact: Dorothy Campbell, Chief Compliance Officer
5328 Trouble Creek Road
New Port Richey, Florida 34652

B.

This Brochure Supplement provides information about Joseph Gerald Ezernack, II that supplements the Trademark Capital Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Dorothy Campbell, Chief Compliance Officer, if you did *not* receive Trademark Capital Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph Gerald Ezernack, II is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Joseph Gerald Ezernack, II was born in 1970. Mr. Ezernack graduated from Northwestern State University in 1999, with a Bachelor's degree in Business Administration. He graduated from University of Georgia, Terry College of Business with a Master's degree in Business Administration (MBA) in 2007.

Mr. Ezernack joined Trademark Capital Management, Inc. in January 2011. He is the Managing Principal, Chief Investment Officer and an Advisory Representative of Trademark Capital. Mr. Ezernack was Chief Executive Officer of Athens Capital Management, LLC from September 2006 to January 2011. He was the Senior Portfolio Manager of Personal Mutual Fund Management (Stadion Money) from 1997 to 2006. He holds a Series 65 Uniform Investment Advisors license.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities – see attached

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Ezernack is one-third Owner of EBE Holdings, LLC, an oil exploration and production company (which is currently not drilling) and has no time commitments to this company.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Dorothy Campbell, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Campbell (727) 848-8950

Part 2B of Form ADV: Brochure Supplement

Brochure Supplement – Joseph Glenn Maxey

Item 1 Cover Page

A.



**Brochure Supplement
Dated 6/30/2011**

Contact: Dorothy Campbell, Chief Compliance Officer
5328 Trouble Creek Road
New Port Richey, Florida 34652

B.

This Brochure Supplement provides information about Joseph Glenn Maxey that supplements the Trademark Capital Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Dorothy Campbell, Chief Compliance Officer, if you did *not* receive Trademark Capital Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph Glenn Maxey is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Joseph Glenn Maxey was born in 1982. Mr. Maxey graduated from Piedmont College in 2006, with a Bachelor's degree in General Business.

Mr. Maxey joined Trademark Capital Management, Inc. in 2011 where he is an Investment Adviser Representative. Mr. Maxey was a Commercial Real Estate Broker at Coldwell Banker Commercial Upchurch Realty from 2007 to 2010. Mr. Maxey was a Trader at Personal Mutual Fund Management (Stadion Money) from 2004 to 2006. He holds a Series 65 Uniform Investment Advisors license.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Dorothy Campbell, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Campbell at (727) 848-8950.

Part 2B of Form ADV: Brochure Supplement

Brochure Supplement – Mary Lynn Patch

Item 1 Cover Page

A.



Brochure Supplement Dated 02/29/2012

Contact: Dorothy Campbell, Chief Compliance Officer
5328 Trouble Creek Road
New Port Richey, Florida 34652

B.

This Brochure Supplement provides information about Mary Lynn Patch that supplements the Trademark Capital Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Dorothy Campbell, Chief Compliance Officer, if you did *not* receive Trademark Capital Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Mary Lynn Patch is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Mary Lynn Patch was born in 1966. Ms. Patch graduated from Loras College in 1989, with a Bachelor's degree in History.

Ms. Patch joined Trademark Capital Management, Inc. in 2012 where she is the Director of Retirement Plan Services. Ms. Patch was the Director of Business Development at Steele Capital Management, Inc. from 2001 to 2012.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Dorothy Campbell, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Campbell at (727) 848-8950.