

FORM ADV**Uniform Application for Investment Adviser Registration****Part II – Page 1**

Name of Investment Adviser: Farrow Financial, Inc.	
Address: (Number and Street) (City) (State) (Zip Code) 283 Boudro Rd Randolph Center, VT 05061	Area Code: Telephone Number: 802-728-4287

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.**

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(Schedule A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.**

FORM ADV
Part II - Page 2

Applicant: Farrow Financial, Inc.

SEC File Number:

Date: 03/26/10

801- 15865

1. **A. Advisory Services and Fees.** (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service.

(See instruction below.)

Applicant:

- | | | |
|-------------------------------------|---|-----|
| <input checked="" type="checkbox"/> | (1) Provides investment supervisory services | 98% |
| <input checked="" type="checkbox"/> | (2) Manages investment advisory accounts not involving investment supervisory services | 1% |
| <input checked="" type="checkbox"/> | (3) Furnishes investment advice through consultations not included in either service described above | <1% |
| <input type="checkbox"/> | (4) Issues periodicals about securities by subscription | % |
| <input type="checkbox"/> | (5) Issues special reports about securities not included in any service described above | % |
| <input type="checkbox"/> | (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities | % |
| <input type="checkbox"/> | (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities | % |
| <input type="checkbox"/> | (8) Provides a timing service | % |
| <input type="checkbox"/> | (9) Furnishes advice about securities in any manner not described above | % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- | | | | |
|----|---|---|-----------------------------|
| B. | Does the applicant call any of the services it checked above financial planning or some similar term? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
|----|---|---|-----------------------------|

C. Applicant offers investment advisory services for: (check all that apply):

- | | |
|--|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input checked="" type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. **Types of Clients** - Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Equity Securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input type="checkbox"/> I. Options contracts on: |
| <input checked="" type="checkbox"/> (3) foreign issues | <input checked="" type="checkbox"/> (1) securities |
| | <input type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> B. Warrants | |
| <input checked="" type="checkbox"/> C. Corporate debt securities | <input type="checkbox"/> J. Futures contracts on: |
| (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> D. Commercial paper | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> (1) real estate |
| <input checked="" type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (2) oil and gas interests |
| | <input checked="" type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> G. Investment company securities | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input type="checkbox"/> (1) variable life insurance | |
| <input checked="" type="checkbox"/> (2) variable annuities | |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Charting | (4) <input checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?

Yes No
☒ ☐

(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- | | |
|-----------------|--|
| • name | • formal education after high school |
| • year of birth | • business background for the preceding five years |

7. Other Business Activities. (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?

Yes No
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes No
☒ ☐

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

See Schedule F.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

See Schedule F.

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Applicant: Farrow Financial, Inc.

SEC File Number:

Date: 3/26/10

801-15865

12. Investment or Brokerage Discretion.

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:
- | | | |
|---|--|---|
| (1) securities to be bought or sold? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |
| (2) amount of the securities to be bought or sold ? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |
| (3) broker or dealer to be used ? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
| (4) commission rates paid? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |

- B. Does applicant or a related person suggest brokers to clients? Yes ☒ No ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? Yes ☐ No ☒
- B. directly or indirectly compensates any person for client referrals? Yes ☐ No ☒

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? Yes ☐ No ☒

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Adviser:
Farrow Financial, Inc.

SEC File Number:
801-15865

Date:
7/22/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV: Farrow Financial, Inc.		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Section 1D	<p>Farrow Financial, Inc. (FFI) offers a variety of financial planning and investment advisory services to Individuals, Trusts, Estates, Charitable Organizations, Corporations, Pension or Profit Sharing Plans, and other investors.</p> <p>FFI Provides three levels of service to our clients: (1) financial planning, (2) investment management with non-continuous investment supervision, and (3) financial planning with continuous investment supervision.</p> <p>Financial Planning-</p> <p>In connection with our financial planning, FFI reviews personal and financial information from clients. We use this information to provide the client with a written financial plan. The plan is designed to assist the client in achieving his or her stated financial goals and objectives.</p> <p>Each financial plan generally addresses the following areas:</p> <p>Personal: Family records, budgeting, personal liability, estate information, and financial goals.</p> <p>Taxes & Cash Flow: Income tax, spending analysis, and planning for past, current, and future years.</p> <p>Death & Disability: Cash needs at death, income needs of surviving dependents, estate planning, and disability income analysis.</p> <p>Retirement: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals. The plan is not intended to project the future value of accrual portfolio holdings, or actual future income. Rather it provides a general idea of how a particular mix of assets similar to a hypothetical portfolio has performed historically.</p> <p>Investments: Analysis of investment alternatives and recommendations based on the plan's results.</p> <p>FFI gathers the required information through in-depth personal interviews with our clients and questionnaires. The information includes the client's current financial status, future goals, and attitudes towards risk. FFI reviews any related documents that the client has supplied, including the completed questionnaires.</p> <p>Should a client choose to implement the plan's recommendations, FFI then recommends that the client work closely with his or her attorney, accountant, insurance agent, and stockbroker. It is entirely up to the client to implement FFI's final recommendations.</p> <p>The client can elect to engage in one-time financial planning, or financial planning with annual plan updates.</p> <p>Investment management (non-continuous supervision)-</p> <p>This service provides the client with non discretionary account monitoring and recommendations guided by his or her stated objectives. These accounts are typically held</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Adviser:
Farrow Financial, Inc.

SEC File Number:
801-15865

Date:
7/22/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV: Farrow Financial, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer
	<p>at bank trust departments. FFI does not monitor the assets on a continuous basis, but rather periodically. The trustee or other person with investment authority can override our advice if he or she chooses.</p> <p>In order to determine the client's individual needs, FFI develops an individual Investment Policy Statement for the client, and frequently holds discussions with the client to review goals and objectives for the investment portfolio. A complete financial plan is available if the client requests it.</p> <p>At least once a year, FFI holds two consultation meetings either in person or over the phone. One of the meetings is between the client and FFI. The other meeting includes the client, the trustee, and FFI. In both meetings, we discuss and update, if necessary, any changes to the client's personal situation and to the investment strategy, as well as conduct a portfolio review. FFI also hold periodical investment review meetings separately with the trustees.</p> <p>The trustee sends the client copies of all trade confirmations and monthly statements, as well as an annual 1099. FFI will report date-to-date performance to the client on a quarterly basis.</p> <p>Continuously Supervised Investment Management-</p> <p>This service provides the client with continuous management of investment assets based on the client's individual needs. FFI monitors the client's investment portfolio on a continuous basis and makes changes to the portfolio as warranted.</p> <p>In order to determine the client's needs, FFI develops a complete financial plan as described above and an individual Investment Policy Statement. FFI holds frequent discussions with the client to review goals and objectives for the investment portfolio.</p> <p>Subsequently, at least once a year a manager from FFI has a consultation meeting either on the phone or in person with the client. During these meetings, the client's personal situations are discussed, as well as changes in portfolio strategy. FFI updates the Investment Policy Statement if necessary. FFI also reviews trading activity, performance for the previous year and current market conditions.</p> <p>Each client will have the opportunity to place reasonable restrictions on the type of investments to be held in the portfolios.</p> <p>Proxy Voting Procedures (Summary):</p> <p>Unless otherwise stated by the client the voting of securities held in the portfolio is performed by FFI who shall exercise those voting rights on behalf of the client.</p> <p>FFI maintains a record of all proxy voting activity and provides details of the voting to clients in writing at their request.</p> <p>If a client prefers to direct proxy voting for securities held for that client, or wishes to request proxy voting records, or wishes to receive a copy of FFI's full policies and procedures regarding proxy voting, please provide written notice to FFI at our address indicated above or contact FFI by phone at the number indicated above.</p>

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Adviser:

Farrow Financial, Inc.

SEC File Number:

801-15865

Date:

7/22/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV: Farrow Financial, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer
	<p>General Information as to Fees-</p> <p>Investment supervisory service accounts will be charged a quarterly investment advisory fee payable in advance. The actual fee charged to the Account is set forth in the schedule below. The fee shall be applied to the fair market value of the assets of the account as reasonably determined by the firm as of the last business day of each quarterly period, and resulting amount divided by four shall be the amount due FFI as compensation for the next quarterly period.</p> <p>Fee Schedule</p> <p>1% per year on balances from \$0-\$500,000 Plus 0.75% on balances from \$500,001-1,000,000 Plus 0.5% on balances above \$1,000,000</p> <p>Non-discretionary accounts are charged a flat quarterly fee payable in advance. The fee is negotiated and set forth in the Exhibit A of the applicable Investment Advisory Agreement.</p> <p>In certain circumstances, account minimums may be negotiable. The fee charged is calculated as described above and is not on the basis of a share of capital gains or upon capital appreciation of the funds or any portion of the funds of an advisory client.</p> <p>Each client's Investment Advisory Agreement or Financial Planning Agreement may be terminated upon written notice of FFI or the client, and termination will become effective upon receipt of such notice. Such termination will not, however, affect the liabilities or obligations of the parties incurred or arising from transactions initiated under the Agreement prior to termination, including the provisions regarding indemnification. Upon termination, it is the client's responsibility to monitor the securities in his or her accounts, and we will have no further obligation to act or advise with respect to those assets. If the client terminates the agreement within five business days of it signing, he or she will receive a full refund of all fees and expenses. If the agreement is terminated after five business days of its signing, any prepaid fees will be refunded.</p> <p>All fees paid to FFI for services are separate and distinct from the fees and expenses charged by investments held by the client, including but not limited to mutual funds, exchange traded funds, brokerage commissions, and account maintenance fees. These fees and expenses are described in the securities prospectus. For mutual funds and ETF's fees may include a management fee, other fund expenses, and possibly a distribution fee. Some mutual funds also impose sales charges; a client may pay an initial or deferred sales charge. A client could invest in these securities directly, without our services. In that case, the client would not receive our services, which are designed among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives.</p> <p>Accordingly, in order to evaluate FFI's advisory service, the client should review the fees charged by mutual funds and ETF's, the fees charged by brokers and custodians, and our fees to realize the total amount to be paid.</p> <p>Financial Planning and other fees:</p>

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Adviser:
Farrow Financial, Inc.

SEC File Number:
801-15865

Date:
7/22/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV: Farrow Financial, Inc.		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
	<p>FFI charges a fee of \$1,000 - \$5,000 for preparation of an initial plan. FFI will charge an additional fee of \$500 - \$1,000 each time the financial plan is reviewed and updated.</p> <p>FFI will charge fees on an hourly basis at a rate of \$100 - \$300 per hour for investments and financial analysis.</p> <p>The fee is due and payable at the time the client agreement is executed. In such circumstances the financial plan will be presented to the client within 90 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the client</p>	
Section 3	<p>Selection of investment assets:</p> <p>FFI invests in many types of investments. Our analytical method involves using the client's personal and financial information to make financial planning recommendations. Depending on specific client needs and current market conditions, we may invest client assets in any of the investments listed in Section 3.</p>	
Section 4A	<p>Investment Strategies, Assets Class Selection, and Asset Allocation.</p> <p>All client accounts are ranked by risk tolerance, income needs, tax considerations, size, and objective. Based on this assessment and client input, accounts are grouped as follows. Each group may contain clients whose account objective is capital appreciation, growth & income, or income.</p> <p>Group 1 – These accounts can tolerate a higher degree of risk, short-term taxable gains and losses, and typically are large. For the equity portion, these accounts will own individual stocks, options, warrants, convertible bonds, exchange-traded funds, and mutual funds. Group one will own certain short-term investments that other groups do not own.</p> <p>Group 2 – These accounts can tolerate some risk, avoid short-term gains and losses when possible, and are typically large. For the equity portion, these accounts will own individual stocks, options, warrants, convertible bonds, exchange-traded funds, and mutual funds.</p> <p>Group 3 – These accounts can tolerate some risk, avoid short-term gains and losses when possible and are typically medium size. For the equity portion, these accounts will own exchange-traded funds and mutual funds. Because of the size of these accounts, they will only own client directed individual securities.</p> <p>Group 4 – These accounts can tolerate some risk. They are, however, too small to own stocks or industry specific exchange-traded funds. Their equity portion will consist of broad index funds.</p>	
Section 5	For those determining or giving investment advice FFI requires a CFP designation.	
Section 6	<p>Education and Business Background</p> <p>John A Farrow, Jr. Born May 15, 1944 B.A. and Ph. D (abd. All but dissertation) University of Rochester, Rochester, NY (1962 – 1969) Certified Financial Planner CFP (1991)</p> <p>Investment Advisory and business consultant since 1976. Employed by Farrow Investment</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Adviser: Farrow Financial, Inc.	SEC File Number: 801-15865	Date: 7/22/10
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV: Farrow Financial, Inc.		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
	<p>Advisory Service until September 1, 1984. Since then John A. Farrow, Jr. has been employed by F.I.S. Co and its successor, Farrow Financial, Inc.</p> <p>Jody L. Richards Born December 19, 1979 A.A. Vermont Technical College Randolph, VT (1997 – 1999) Certified Financial Planner CFP (2005) B.S. Strayer University (2004 -2006) MS Boston University (2008-2009) CFA Level II Candidate</p> <p>Jody Richards has been employed by Farrow Financial Inc. since 2000.</p>	
Section 9E	<p>Participation or Interest in Client Transactions</p> <p>As an adviser and a fiduciary to our clients, our client's interests must always be placed first and foremost, and our trading practices and procedures prohibit unfair trading practices and seek disclose and avoid any actual or potential conflicts of interests or resolve such conflicts in the client's favor.</p> <p>FFI seeks but is not obligated to aggregate orders for the purchase or sale of the same security for client accounts where we deem this appropriate and in our client's best interests, as well as consistent with applicable regulatory requirements. The aggregation or bunching of client transactions frequently allows us to execute transactions in more timely, equitable, and efficient manner. We aggregate client transactions where possible and when advantageous to clients. In these instances, clients participating in any aggregated transactions will receive an average share price, and transaction costs will be shared equally and on a pro-rata basis.</p> <p>FFI does not aggregate employee and principals proprietary accounts with client trades. FFI's allocation policy is fair and equitable to all clients, with no particular group or client(s) being favored or disfavored over any other clients. In other words, it prohibits any allocation of trades in a manner that any particular client or group of clients receives more favorable treatment than any other client accounts.</p> <p>Before entering an aggregated order, FFI will prepare a written allocation statement specifying the participated client accounts. It also specifies how we intend to allocate the order among those clients, while taking into consideration individual investment objectives, portfolio composition, and requirements.</p> <p>If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the allocation statement; if the order is partially filled, it will be allocated pro-rata based on the allocation statement.</p> <p>However, the order may be allocated on a different basis from the allocation statement if:</p> <ul style="list-style-type: none"> All client accounts receive fair and equitable treatment; and The reason for the different allocation is explained in writing; and It is approved by FFI's compliance officer no later than one hour after opening of the markets on the trading day following the day the order was executed. <p>FFI has some clients who will have the opportunity to participate in IPO's due to their directed broker choice. We do not advise or allocate IPO's to clients. We do not provide advise to client on IPO's. We will manage the position after the purchase if the client</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Adviser: Farrow Financial, Inc.	SEC File Number: 801-15865	Date: 7/22/10
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV: Farrow Financial, Inc.		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
	<p>instructs us to do so.</p> <p>Firm & Employee Trading</p> <p>FFI and our employees buy and sell for itself/themselves securities that we also recommend to clients. We allow employees to maintain personal securities accounts. Any personal investing by an employee, however, in any accounts in which he or she has a beneficial interest, including any accounts for an immediate family or household member, must be consistent with our fiduciary duty to our clients and consistent with regulatory requirements.</p> <p>Summary of Code of Ethics</p> <p>The general principles of our Code of Ethics</p> <p>We have the duty at all times to place the interest of the clients first;</p> <p>The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics and to avoid any actual or potential conflict of interest or any abuse of an employee's position of trust and responsibility</p> <p>The principle that investment adviser personnel should not take inappropriate advantage of their positions;</p> <p>The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and</p> <p>The principle that independence in the investment decision-making process is paramount.</p> <p>Require each employee to identify any personal investment accounts and report all reportable transactions and investment activity at least quarterly, and</p> <p>Prohibit any employee from acting upon, misusing, or disclosing any material non-public information, also known as inside information.</p> <p>Farrow Financial Inc. will provide a copy of the Code of Ethics on request to any client or prospective client upon request.</p>	
Section 10	<p>Conditions for Managing Accounts:</p> <p>FFI imposes an account minimum size limit on new investment management accounts of \$500,000. There is no minimum on Financial Planning and unsupervised accounts. In certain circumstances the account minimum size may be waived.</p>	
Section 11A	<p>John Farrow and Jody Richards review all accounts to insure they conform to the client's objective and profile. These reviews occur at least monthly and may occur more frequently if there is a material change. Some examples of material changes: change in market conditions, significant deposits or withdrawals, change in client status, or change in client objectives.</p> <p>In addition, each supervised investment management account is reviewed with the client in a consultation meeting either on the phone or in person at least once a year. During these meetings, changes in the client's personal situation are discussed, as well as changes in the portfolio strategy.</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Adviser: Farrow Financial, Inc.	SEC File Number: 801-15865	Date: 7/22/10
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of Adviser exactly as stated in Item 1A of Part I of Form ADV: Farrow Financial, Inc.		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
	<p>Each non-supervised investment management account is reviewed with the client in a consultation meeting either on the phone or in person at least once a year. During these meetings, changes in the client's personal situation are discussed, as well as changes in portfolio strategy.</p> <p>Accounts subject to periodic consultation review are reviewed on the phone or in person at least once a year with the Client. They are also reviewed with the trust dept. or other fiduciary on a regular basis.</p> <p>Financial Plans are updated periodically unless a client requests an updated plan.</p>	
Section 11B	<p>Investment supervisory clients receive confirmations of transactions as well as monthly statements from their broker. FFI provides these clients with comprehensive quarterly statements. The report statements from FFI include an account summary, year to date realized gains and losses, and performance gross of fees (before fees).</p> <p>All other clients are expected to receive confirmations and monthly statements regarding purchases and sales directly from their broker. They also get periodic analysis reports from FFI as agreed upon by the client and FFI.</p>	
Section 12A	<p>Investment or Broker Discretion:</p> <p>FFI does not select broker dealers or custodians for our clients. For clients in need of brokerage or custodial services, and depending on client circumstances, FFI may recommend several broker dealers for the client's consideration. Our clients must evaluate these brokers before opening an account. The factors that we consider when making this recommendation include the broker's ability to provide professional services, execution, and cost. Clients are not under any obligation to affect trades through any recommended broker. All clients are free to select any broker of his or her choice. Current brokers that we suggest are Smith Barney, TD Ameritrade, and Charles Schwab.</p> <p>All research is used for all clients. Research and services are not contingent upon committing any amount of business (assets under custody, trading commissions, or directed trading).</p>	
Section 13A	<p>Additional Compensation:</p> <p>FFI does not enter into so-called soft dollar agreements with broker dealers. FFI does receive benefits from firms where our clients custody their assets. Some of the benefits would not be available if our clients did not use those firms. The benefits include duplicate client confirmations and bundled duplicate statements; access to trading desks; access to block trading, which provides the ability to aggregate security transactions, and then allocate the appropriate shares to client accounts; the ability to have investment advisory fees deducted directly from client accounts; access to an electronic communications network; receipt of compliance publications; research reports; and access to mutual funds generally only available to institutional investors. Additional benefits include educational events or occasional business entertainment of FFI employees. Many of these products and services may be used to service all or some substantial number of FFI accounts, including accounts not maintained at a specific broker. These benefits do not depend upon the amount of transactions directed to or the size of accounts that the firms hold.</p>	

Complete amended pages in full, circle amended items and file with execution page (page 1).