

# **Scott Dahl Andreiko**

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**April 9, 2012**

## **FORM ADV PART 2 BROCHURE**

This brochure provides information about the qualifications and business practices of Scott Dahl Andreiko. If you have any questions about the contents of this brochure, please contact him at (760) 633-4609. 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 Scott Dahl Andreiko is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Scott Dahl Andreiko is 113968.

Scott Dahl Andreiko is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## Item 2 Material Changes

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

Generally, Scott Dahl Andreiko will notify clients of material changes on an annual basis. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly. In either case, we will notify our clients in a separate document.

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## Item 4 Advisory Business

### Description of Services and Fees

Scott Dahl Andreiko is a registered investment adviser based in Encinitas, California. He is organized as a sole proprietorship under the laws of the State of California. Scott Dahl Andreiko has been providing investment advisory services since 1981 and Scott Dahl Andreiko is the owner and Chief Compliance Officer. Currently, Scott Dahl Andreiko offers 'fee-only wealth management' as well as the following investment advisory services, which are personalized to each individual client:

- **Portfolio Management Services**
- **Consulting Services**

The following paragraphs describe Scott Dahl Andreiko's services and fees. Please refer to the description of each investment advisory service listed below for information on how he tailors his advisory services to your individual needs.

### Portfolio Management Services

Scott Dahl Andreiko offers discretionary portfolio management services to his clients and prospective clients. His investment advice is tailored to meet his clients' needs and investment objectives. If you retain Scott Dahl Andreiko for portfolio management services, he will meet with you to determine your investment objectives, risk tolerance, and other relevant information (the "suitability information") at the beginning of the advisory relationship. Scott Dahl Andreiko will use the suitability information he gathers from your initial meeting to develop a strategy that enables him to give you continuous and focused investment advice and/or to make investments on your behalf. As part of his portfolio management services, Scott Dahl Andreiko may customize an investment portfolio for you in accordance with your risk tolerance and investing objectives. He may also invest your assets using a predefined strategy, or he may invest your assets according to one or more model portfolios developed by him. Once Scott Dahl Andreiko constructs an investment portfolio tailored to your needs, he will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in his discretionary portfolio management services, Scott Dahl Andreiko requires you to grant him discretionary authority to manage your account. Discretionary authorization will allow him to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement, a power of attorney, or trading authorization forms you sign with Scott Dahl Andreiko. You may limit Scott Dahl Andreiko's discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing him with your restrictions and guidelines in writing.

Scott Dahl Andreiko's fee for portfolio management services is based on a percentage of your assets he manages and is set forth in the following fee schedule:

<b><u>Assets Under Management</u></b>	<b><u>Annual Fee*</u></b>
First \$250,000	1.00%
From \$250,001 to \$500,000	0.75%
From \$500,001 to \$1,000,000	0.50%
\$1,000,001 and above	0.25%

*\*A minimal fee of \$1,500 may be imposed on accounts that fall below that amount per the above fee schedule. Please note that these fees do not include transaction fees, or other expenses or fees charged by brokers, custodians, or mutual funds. A total annualized fee of 1.25% will be assessed on accounts where Scott Dahl Andreiko serves as the trustee.*

Scott Dahl Andreiko's annual portfolio management fee is billed and payable quarterly in arrears based on the value of your account on the last day of the quarter. If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, his fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Scott Dahl Andreiko's advisory fee is negotiable, depending on the individual client circumstances.

At his discretion, Scott Dahl Andreiko may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, he may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in Scott Dahl Andreiko's fee schedule stated above.

Either party may terminate the portfolio management agreement within the first five business without any penalty imposed on you. After the five day period, either party may terminate the agreement by providing written notice to the other party. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client.

Scott Dahl Andreiko encourages you to reconcile his fee notification statements with the statement(s) you receive from the qualified custodian. If you find any discrepancies in stated advisory fees between Scott Dahl Andreiko's fee notification statement and the account statement(s) you receive from the qualified custodian, please call Scott at the number located on the cover page of this brochure.

### **Consulting Services**

You may also request limited financial advice and/or non investment related advice. Scott Dahl Andreiko offers general consulting services that address only those specific areas of interest or concern. Fees for consulting services are negotiated on a case-by-case basis and will be mutually agreed upon by both Scott Dahl Andreiko and you prior to engagement.

### **Types of Investments**

Scott Dahl Andreiko offers advice on equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, U.S. Government securities, and interests in partnerships investing in real estate, oil and gas interests.

Additionally, Scott Dahl Andreiko may advise you on any type of investment that he deems as appropriate based on your stated goals and objectives. He may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

### **Assets Under Management**

As of December 16, 2011, Scott Dahl Andreiko managed approximately \$59,316,325 in client assets on a discretionary basis, and no client assets on a non-discretionary basis.

## Item 5 Fees and Compensation

Please refer to the "Advisory Business" section in this Brochure for information on Scott Dahl Andreiko's advisory fees and refund policy according to each service he offers. Lower fees for comparable services may be available from other sources.

### Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this brochure.

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

Scott Dahl Andreiko does not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Scott Dahl Andreiko's fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## Item 7 Types of Clients

Scott Dahl Andreiko offers investment advisory services to individuals, trusts, estates, charitable organizations, corporations, and other business entities.

In general, he does not require a minimum dollar amount to open and maintain an advisory account; however, he may assess a minimum annual fee of \$1,500 on accounts that are valued below \$150,000. Scott Dahl Andreiko may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

Scott Dahl Andreiko's investment strategies and advice may vary depending upon each client's specific financial situation. As such, he determines investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your written restrictions and guidelines may affect the composition of your portfolio.

Scott Dahl Andreiko may use one or more of the following methods of analysis when formulating investment advice:

- **Proprietary Timing Model:** involves analyzing the client's holdings based on seasonality, election year cycles, monetary policy and technical indicators.
- **Fundamental Analysis:** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

- **Charting Analysis:** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which are used to predict future price movements based on price patterns and trends.
- **Technical Analysis:** involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.
- **Cyclical Analysis:** a type of technical analysis that involves evaluating recurring price patterns and trends.

### **Associated Risks**

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

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

**Cyclical Analysis** - Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

We primarily utilize the following types of investment strategies:

- **Long Term Purchases** - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Investments are normally held until a timing model change dictates a change in the client's account.
- **Short Term Purchases** - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

### **Tax Considerations**

Scott Dahl Andreiko's strategies and investments may have unique and significant tax implications. Scott Dahl Andreiko will maximize tax efficiency as it pertains to discretionary timing of gains and losses as part of the portfolio management services he will provide to all his clients. Scott Dahl Andreiko provides tax planning and tax return preparation for some of his clients. If you have not engaged him, for such services, Scott Dahl Andreiko will recommend that you consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting to the IRS, the cost basis of equities acquired on or after January 1, 2011. Our firm will either instruct the custodian to use the first-in, first-out "FIFO" accounting method for calculating and reporting the cost basis of your equity investments or the custodian will default to the FIFO method where no instruction is given.

You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

### **Risk of Loss**

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

### **Item 9 Disciplinary Information**

Scott Dahl Andreiko has been registered and providing investment advisory services since 1981 and has no reportable disciplinary information.

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

Scott Dahl Andreiko offers tax services including preparation and tax planning. Clients that contract with Scott Dahl Andreiko for advisory services may also contract him for tax services. Clients are instructed that they are under no obligation to use the services Scott Dahl Andreiko for both advisory and tax services. Moreover, clients that contract with Scott Dahl Andreiko for both services are advised that the fees charged for advisory services are normally separate and distinct from the fees charged for tax services, while in some instances, they are included in the advisory services for no additional fee.

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

Scott Dahl Andreiko strives to comply with applicable laws and regulations governing his practices. Therefore, his Code of Ethics includes guidelines for professional standards of conduct for all persons. Scott Dahl Andreiko's goal is to protect your interests at all times and to demonstrate his commitment to fiduciary duties of honesty, good faith, and fair dealing with you. Scott Dahl Andreiko is also expected to adhere strictly to these guidelines. Additionally, he maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account. Scott Dahl Andreiko's Code of Ethics is available to you upon request. You may obtain a copy of his Code of Ethics by contacting Scott Dahl Andreiko at (760) 633-4609.

Scott Dahl Andreiko may buy or sell securities for you at the same time he buys or sells such securities for his own account. Scott Dahl Andreiko may recommend securities to you at the same time he purchases such securities for our own account.

A conflict of interest exists in such cases because Scott Dahl Andreiko has the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is Scott Dahl Andreiko's policy that he will never have priority over your account in the purchase or sale of securities.



## **Item 12 Brokerage Practices**

Scott Dahl Andreiko recommends the brokerage and custodial services of Schwab Institutional, a division of Charles Schwab & Co., Inc. ('Schwab Institutional'), a securities broker-dealer and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. Scott Dahl Andreiko believes that Schwab Institutional provides quality execution services for you at competitive prices. Price is not the sole factor he considers in evaluating best execution. Scott Dahl Andreiko also considers the quality of the brokerage services provided by Schwab Institutional, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to his clients. In recognition of the value of research services and additional brokerage products and services Schwab Institutional provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

Scott Dahl Andreiko will use such products and services for all client accounts, not just for those accounts whose commissions may be considered to have been used to pay for the research received.

### **Brokerage for Client Referrals**

Scott Dahl Andreiko does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

### **Directed Brokerage**

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

### **Block Trades**

Scott Dahl Andreiko does not combine multiple orders for shares of the same securities purchased for advisory accounts he manages (the practice of combining multiple orders for shares of the same securities is commonly referred to as "block trading"). Accordingly, you may pay different prices for the same securities transactions than other clients pay. Furthermore, Scott Dahl Andreiko may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than other clients.

## **Item 13 Review of Accounts**

Scott Dahl Andreiko will monitor your accounts on a regular basis and will conduct account reviews at least quarterly to ensure the advisory services provided to you and the portfolio mix are consistent with your current investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals;
- year-end tax planning;
- market moving events;
- security specific events; and/or,
- changes in your risk/return objectives.

Scott Dahl Andreiko may provide you with additional or regular written reports in conjunction with account reviews. Reports he provides to you will contain relevant account information such as an inventory of account holdings showing current market value and cost basis and account performance, sorted by investment categories. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s) as well, thus he encourages you to reconcile these statements on a regular basis. If you encounter a discrepancy in these reports, please contact Scott immediately by phone at (760) 633-4609.

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

Scott Dahl Andreiko does not compensate any person for client referrals and/or obtain an economic benefit from someone outside of the firm for providing investment advice or other advisory services to clients.

### **Item 15 Custody**

Scott Dahl Andreiko serves as a trustee to certain clients accounts for which he provides investment advisory services. Scott Dahl Andreiko's capacity as trustee gives him custody over the advisory accounts for which he serves as trustee. These accounts will be held with a bank, broker-dealer, or other qualified custodian. If Scott Dahl Andreiko acts as trustee for any of your advisory accounts, you will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. You should carefully review account statements for accuracy. Scott Dahl Andreiko will also provide fee statements to you. You should compare his fee statements with the statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact Scott Dahl Andreiko at (760) 633-4609.

### **Item 16 Investment Discretion**

Before Scott can buy or sell securities on your behalf, you must first sign the discretionary management agreement, a power of attorney, and/or trading authorization forms.

You may grant Scott Dahl Andreiko discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this Brochure for more information on Scott Dahl Andreiko's discretionary management services.

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

#### **Proxy Voting**

Scott Dahl Andreiko will not vote proxies on behalf of your advisory accounts. At your request, he may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event Scott Dahl Andreiko were to receive any written or electronic proxy materials, he will forward them directly to you by mail, unless you have authorized him to contact you by electronic mail, in which case, he will forward any electronic solicitation to vote proxies.

## **Item 18 Financial Information**

Scott Dahl Andreiko does not require the prepayment of fees in excess of \$500 and six or more months in advance. However, as discussed in the *Custody* section of this Brochure, Scott Dahl Andreiko serves as trustee on certain advisory accounts. Scott Dahl Andreiko does not have a financial condition that will impair his ability to meet his client's contractual commitments; however, if he does become aware that a material financial condition becomes apparent, he will update this brochure to disclose this financial condition.

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

### **Scott Dahl Andreiko, Sole Proprietor**

Mr. Andreiko's education, business background, and outside business activities are described in his ADV Part 2B, which is provided as a supplement and incorporated by reference to this Brochure.

Neither our firm, nor any of our Associated Persons are compensated for advisory services with performance-based fees. Please refer to the "Performance-Based Fees and Side-By-Side Management" section above for additional information on this topic.

Neither our firm, nor any of our Associated Persons have any reportable arbitration claims, civil, self-regulatory organization proceeding or administrative proceeding.

Neither our firm, nor any of our Associated Persons have a material relationship or arrangement with any issuer of securities.

All material conflicts of interest under California Code of Regulations Section 260.238 (k) are disclosed regarding our firm, our representatives and our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

## **Item 20 Additional Information**

### **Your Privacy**

Scott Dahl Andreiko views protecting your private information as a top priority. Pursuant to applicable privacy requirements, he has instituted policies and procedures to ensure that he keeps your personal information private and secure.

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

Scott Dahl Andreiko restricts internal access to nonpublic personal information about you to individuals or entities that need information in order to provide products or services to you. Scott Dahl Andreiko maintains physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure his integrity and confidentiality. Scott Dahl Andreiko will not sell information about you or your accounts to anyone. Scott Dahl Andreiko does not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of Scott Dahl Andreiko's privacy notice prior to or at the time you sign an advisory agreement with him. Thereafter, he will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact Scott Dahl Andreiko at (760) 663-4609 if you have any questions regarding this policy.

**Trade Errors**

In the event a trading error occurs in your account, Scott Dahl Andreiko's policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will keep the profit.

**Class Action Lawsuits**

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

**Scott Dahl Andreiko**

**380 East Glaucus Street  
Encinitas, CA 92024**

**Phone: (760) 633-4609**

**April 27, 2012**

**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Scott Dahl Andreiko that supplements his company's brochure. You should have received a copy of that brochure. Please contact Scott Dahl Andreiko if you did not receive his disclosure brochure or if you have any questions about the contents of this supplement.

Additional information about Scott Dahl Andreiko is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable CRD number for Scott Dahl Andreiko is 4492588.

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

**Scott Dahl Andreiko**

*Year of Birth:* 1951

*Formal Education After High School:*

- University of Southern California, MBA graduated Magna Cum Laude 1974

*Business Background:*

- Scott Dahl Andreiko, Sole Proprietor, 1981 to Present.

*Certifications :*

- Chartered Financial Analyst, 1984 - This designation is issued by the CFA Institute and is granted to individuals who meet one of the following prerequisites: possess an undergraduate degree and four years of professional experience investment decision making; or four years qualified work experience (full time, but not necessarily investment related). The candidate is required to complete a self study program involving 250 hours of study for each of the following three disciplines: Level One: Ethics & Professional Standards; Level Two: Investment Tools & Asset Classes; and Level Three: Portfolio Management & Wealth Planning. Once the designation is issued, no further Continuing Education is required.

## **Item 3 Disciplinary Information**

Scott Dahl Andreiko does not have, nor has he ever had, any disciplinary disclosure.

## **Item 4 Other Business Activities**

Scott Dahl Andreiko offers tax services including preparation and tax planning. Clients that contract with Scott Dahl Andreiko for advisory services may also contract him for tax services. Clients are instructed that they are under no obligation to use the services Scott Dahl Andreiko for both advisory and tax services. Moreover, clients that contract with Scott Dahl Andreiko for both services are advised that the fees charged for advisory services are normally separate and distinct from the fees charged for tax services, while in some instances, they are included in the advisory services for no additional fee.

## **Item 5 Additional Compensation**

Scott Dahl Andreiko does not receive any additional compensation in connection with providing advisory services beyond that received for advisory and trustee services as described in the Form ADV Part 2A Brochure.

## **Item 6 Supervision**

Mr. Andreiko, Sole Proprietor, is the Chief Compliance Officer, and is solely responsible for all investment advice; therefore, he is not subject to supervision.

Nonetheless, he has established written policies and procedures that are reasonably designed to detect and prevent violations of the securities laws, rules and regulations.

## **Item 7 Requirements for State Registered Advisers**

Scott Andreiko does not have, or has ever had, any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.