

Part 2A of Form ADV: Firm Brochure

Item 1 – Cover Page

Financial Economics Consulting Group, Inc.

2316 University Boulevard
Tuscaloosa, Alabama 35401
Telephone: (205) 345-0934
Fax: (205) 391-0927
Website: www.fecg.com

June 26, 2012

This brochure provides information about the qualifications and business practices of Financial Economics Consulting Group, Inc. (FECG). If you have any questions about the contents of this brochure, please contact us at (205) 345-0934. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Financial Economics Consulting Group, Inc. is a registered investment advisor. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communication of an Adviser provides you with information to assist in your determination to hire or retain an Adviser.

Additional information about FECG is available on the SEC's website at www.adviserinfo.sec.gov can search this site by a unique identifying number, known as a CRD number. The CRD number for FECG is 117418.

Item 2 – Material Changes

The SEC adopted new rules and rule amendments under the Investment Advisers Act of 1940 to implement provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act. As a result, FECG is no longer eligible for SEC registration. We are in the process of switching from federal to state oversight, and the transition must be complete by June 28, 2012. Once the transition is complete, FECG's investment advisory business will be regulated by the Alabama Securities Commission.

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	9
Item 7 – Types of Clients.....	10
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	11
Item 9 – Disciplinary Information	14
Item 10 – Other Financial Industry Activities and Affiliations	15
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading	16
Item 12- Brokerage Practices.....	17
Item 13 – Review of Accounts.....	19
Item 14 – Client Referrals and Other Compensation.....	20
Item 15 – Custody	21
Item 16 – Investment Discretion.....	22
Item 17 – Voting Client Securities.....	23
Item 18 – Financial Information	24
Item 19 – Requirements for State-Registered Advisers.....	25

Item 4 – Advisory Business

Financial Economics Consulting Group, Inc. founded in 1985 by principles Stephen W. Reinhart and Robert W. McLeod, Ph.D. is an independent, locally owned and operated firm providing personal investment and financial management. Our client base includes primarily individuals. No specific banks or brokerage companies' affiliation allows the firm to offer flexible solutions to the targeted needs of clients. Members of the firm have the knowledge, education, and broad-based financial experience to stay abreast of emerging trends and to guide wise decision-making.

Benefits of A Relationship with FECG

- **Personal Service** – Our clients communicate directly with the principles of FECG who evaluate your financial needs and work with you to develop a financial strategy specifically tailored to the individual's needs.
- **Direct Management** – A skilled portfolio manager invests your funds. Assets selected conform to individual client's characteristics, goals, needs and risk tolerance level.
- **Clear Communication** – A complete, personalized financial analysis is the foundation for all decisions for a client's account. The document is an initial evaluation and updated periodically to ensure that all investments are appropriate for and conform to the client's financial goals and they evolve and change. Monthly statements, quarterly reports and annual reviews are all an ongoing communication strategy for the financial health of a client's individual portfolio.

Investment Management

FECG is a fee only, full-service asset management firm focusing on customer service. In the past, only institutional and high net worth investors were able to benefit from having the most competent consultation, investing products and services.

Today, we are able to meet these standards for the individual investor. Our highly qualified team has the skills and experience in techniques needed to maximize wealth, based on the level of risk an individual is willing to incur.

At FECG, our core competencies lie in the area of consulting services for the client. Among those are:

- in-house asset management
- strategic alliances with Charles Schwab the custodian
- individually structured and managed portfolios of securities based on defined client investment objectives
- managing each individual portfolio to maximize wealth rather than purely focusing on returns
- innovation and diligence to find the ideal financial setting for each client
- Clients own 100% of the securities in their portfolio allowing a tailor made structure suited to specific needs.
- the client owned individual approach provides a variety of tax advantages and customization features can enhance and increase clients' overall satisfaction with their portfolios.

FECG believes that, by working with each client as a team and offering our advice to supplement the individual investment strategy, clients will achieve higher returns. Because we have no affiliation to the firms selected, clients have an unbiased expert team of managers working for you. FECG bases our success on performance relative to each client's goals, not commission. While we believe it is in a client's best interest to allow FECG to manage their investments, we do understand that some people prefer just an advisory relationship. FECG offers advice and recommendations after review based upon the economic outlook, investment markets as a whole and the goals of the client. The client is then free to act as they see fit with respect to our input. FECG provides clients investment supervisory services by contract to provide discretionary management and non-discretionary advisory services for individuals and their designated assets. Our management style centers on asset analysis and portfolio structuring, with investment strategies. FECG focuses the implementation upon client objectives and characteristics. Investment purchases or recommendations include the following individual securities:

- Common and preferred stocks
- Fixed income investments
- Closed-end and open-end no load mutual funds
- All recommendations and purchases are made as deemed appropriate for each client

Services include:

- quarterly statements
- meetings as requested by the client

FECG's fee structure is according to:

- the services sought by the client
- the assets and asset mix managed to meet the goals
- objectives and risk characteristics of the each client
- on the last trading day of each quarter, quarterly fees are calculated based upon market value; one fourth of the fee is billed and paid in arrears after the end of the quarter
- fees may be negotiable
- a copy of the fee schedule is noted in this brochure

Financial Planning Services

The ability to manage your money in today's complex financial world requires knowledge of many diverse areas of expertise. Individuals need experts with skills to analyze their current financial position, set realistic goals for their family's future and implement effective plans to achieve the stated goals. Financial Economics Consulting Group provides access to professional financial planning and offers a variety of services including:

- Detailed Analysis of current financial position
- Individual Goal Setting
- Income and Expenditure Projections
- Investment Analysis and Recommendation
- Insurance and Risk Analysis
- Retirement Planning
- Estate Planning
- Plan Implementation and Monitoring

We have designed our program to address the needs of clients seeking comprehensive financial planning as well as those seeking only advice in specific areas. The program is client driven and the client determines the actual services desired. These services and recommendations are provided on an advisory basis and not investment supervisory service. The client is billed for services on an hourly rate based upon the time needed to complete the analysis and meetings with the individual. FECG does not require any management of the client's investment assets involved in these services. Any client interested in pursuing investment management services are

directed to an investment advisor for more information. A financial planning client may contract for an annual review of their plan and its structure that encompasses a review of the investments being employed and their goals and objectives to determine if changes are needed or the basis of the plan has changed.

Item 5 – Fees and Compensation

Advisory/Consulting Fees are based on the amount of time: extensive financial case analysis and follow-up meetings, necessary to adequately address the financial objectives of the client and are billed at a rate of \$100 an hour. The billing method, hourly or flat fee, will be established at the onset and detailed in the Investment Management Services/Consulting Agreement along with the scope of services to be provided.

Investment Management Services

The annual fee for investment management services is charged as a percentage of assets under management, according to the schedule below:

First	\$1,000,000	1%	of	Market Value
	\$1,000,001-\$2,999,999	.85%	of	Market Value
	\$3,000,000-\$4,999,999	.60%	of	Market Value
	\$5,000,000-\$7,499,999	.55%	of	Market Value
	\$7,500,000-\$9,999,999	.50%	of	Market Value
	\$10,000,000 +	.45%	of	Market Value

FECG retains the right to negotiate fees with clients based on the specifics of each account. Any changes to the stated compensation schedule will typically serve to reduce the assessed fees. Examples could include combining accounts or accounts with limited activity. The fee and billing method is included in the written Investment Management Agreement. Fees are calculated based upon the client's account value provided by the custodial statement at the end of the calendar quarter. New accounts are charged a prorated fee for the portion of the quarter based upon the inception date.

FECG requests authority from clients to receive quarterly payments directly from the client's account held by the independent custodian. Clients must provide written limited authorization to FECG to withdraw fees from the account. Clients receive statements from the custodian disclosing the advisory fees directly debited from their account(s) and an FECG invoice disclosing the calculation and the fee billed in arrears for the previous calendar quarter based upon the account value.

An agreement may be cancelled at any time, by either party upon receipt of 30 days written notice. Upon termination of any account, fees will be calculated and prorated based upon the time period remaining and debited from the account or billed directly to the client for payment of

services provided.

Fees such as brokerage commission, transaction fees and other related costs and expenses are exclusive of FECG management fees and shall be incurred by the client. Other charges incurred by the client may be imposed by custodians, brokers or third parties including but not limited to custodial fees, transfer taxes, wire transfer and electronic fund fees, other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees and are disclosed in the fund's prospectus.

The fees charged by FECG for investment management services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. Such fees and commissions are exclusive and in addition to FECG fees and the firm shall not receive any portion of these commissions, fees and costs.

Financial Planning Fees

Financial Planning Fees are based on the amount of time spent gathering and compiling Client's information, extensive financial case analysis, conferring with Client, and/or any activities directly associated with implementing FECG obligations under this agreement and necessary to adequately address the financial objectives of the client. Fees are billed \$500 for initial review and \$125 an hour thereafter. The fees are billed monthly and are established at the onset and detailed in the Financial Planning Services Agreement.

Business Valuations

Fees for Business Valuations are negotiated, with the typical business taking 50 hours to value. All valuations are supported by documented written reports prepared in accordance with the client's defined assignment and supported by generally accepted financial valuation techniques.

Litigation Support

Expert witness fees are \$350 an hour plus expenses, for testifying experts. Associates are billed at other rates depending upon the services provided.

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

Financial Economics Consulting Group, Inc. does not charge any performance-based fees. Fees are calculated as described previously and are not charged on the basis of income, capital gains or capital appreciation.

Item 7 – Types of Clients

Financial Economics Consulting Group recognizes that our clients have unique investment goals and objectives. FECG serves individuals from all walks-of- life. Our clients vary in profession, age, and marital status with different financial needs, goals and objectives.

FECG provides services to individuals (including high net worth individuals), qualified retirement plans, trusts, small businesses and organizations. Our ability to know our clients and design customized investment portfolios and services to match each client's needs sets FECG apart in today's competitive world. The key to a successful relationship begins with understanding the client's current and future financial objectives and needs, then matching those needs with the most appropriate and efficient portfolio structure and services. Our clients include \$45,887,023 discretionary clients and \$4,100,695 non-discretionary clients.

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

FECG develops an individualized strategy with clients based upon facts provided in the investment policy statement outlining risk tolerance, specific goals, account characteristics and needs of the account. The information regarding strategy is the general strategy employed by the firm.

Philosophical View - We have our foundation in monetarism – the belief that the control of the basic money supply and interest rates, in conjunction with fiscal policy, determines the direction and strength of economy. These shifts in accommodation effect consumer and corporate spending by squeezing out marginal demand and how and where capital is spent in the economy. By recognizing cyclical changes and trends, we can focus on those industries and companies that may benefit from future growth in these areas.

Risk Perspective - FECG would be classified as average or moderate risk managers. Since each asset group – stocks, fixed-income, cash, commodities, etc. – are in competition for investment dollars we apply a reasonable value approach in evaluating each investment. Does the differential between expected returns of an asset group justify the marginal risk that might be incurred? This reflects our strategy of creating a balanced structure between income and growth and is expressed in a total return approach to management. The overall return is a combination of income from interest and dividends in conjunction with appreciation or growth. To target a rate of return that is both appropriate for the account but less market sensitive and volatile over time. Which is more emphasized (income or growth) at any point in time depends on the economic and market conditions relative to each asset group. These factors influence which asset group is perceived to have the greater appreciation potential and thus the asset allocation that is most appropriate in managing market and security risk in the portfolio.

Fixed Income Sector— Within this sector, we control the type of security -- treasuries vs. corporate vs. preferred vs. cash – the maturity range and the weighting to limit the exposure to rising interest rates and inflation. Rising interest rates are normally synonymous with an expanding economy, rising profits and company values. Thus, reposition funds to growth from the income group.

Growth or Stock Sector— Within this sector, we screen companies within the selected industries to identify reasonable value relative to earnings growth. Some of the factors considered when valuing each security are – price-to-book (P/B), price-to-sales (P/S), expected sales and earnings growth rates, the price/earnings to growth ratio (PEG), historical valuation ranges and prices. In addition, the product mixes company position with the industry, management stability, and consistency in revenue, earnings and dividend growth.

Choosing the appropriate investment

Most investors want their investments to reflect their goals and objectives as closely as possible. FECG uses a variety of investment instruments in determining the appropriate mix to meet each individual's needs. There is a myriad to choose from in today's market and the selection process is very involved in a customized portfolio.

Depending upon the individual's objectives, the following are among the types of investments considered by FECG in designing a portfolio:

- Common stocks
- Preferred stocks
- Fixed Income Securities
- Mutual Funds, closed end funds and exchange traded funds

Philosophy and Methodology

- FECG maintains an investment philosophy emphasizing a combination top-down (the general economic environment) and bottom-up (individual companies within their industries) approach to determine the relative values, which exist among asset classes. Components of our investment approach include fundamental and technical analysis, asset allocation and relative valuation.
- Generally, clients seek a balanced investment approach, with invested funds allocated between income-producing assets and growth-oriented assets. We assist the client in determining the realistic investment objectives, which will satisfy their long-term goals given their risk parameters.
- We see the role of our firm as integrating the current and projected economic and investment environments with the clients' objectives regarding risk and return.
- When selecting securities for a client's portfolio, primary emphasis will be given to fundamental analysis. However, we also utilize technical analysis to assist in the investment timing process. Information may be taken from available databases, business periodicals, published research material; company published material, or other sources. The information will generally be utilized for two specific purposes:
 - To construct a reasonable description of the current and projected economic environment
 - To determine which securities are purchased or sold

- Screening variables for fixed-income assets include:
- Nominal Yields
- Real Rates of Return
- Credit Quality
- Maturity Structure, etc.
- Such variables for stocks would include the company's industry outlook, current and relative P/E ratios, price to sales ratio, market capitalization, and dividend yield and the anticipated earnings and dividend growth.

Risk of Loss

Clients should be aware that investing in securities involves risk of loss and should be prepared to bear the loss. Investments whether mutual funds, ETFs, individual bonds or equities present the risk of loss of principal and value of the securities when sold or disposed in other ways. Because of inflation and other economic factors, the value of securities when sold may be greater than the purchase price, but the risk of appreciation may be less than inflation, which means the purchasing power of the proceeds could be less than the original investment purchasing power.

More information regarding the risks of specific market sectors can be found in prospectuses and in individual discussions with your investment advisor.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary actions or events that would be material to a client's evaluation of Financial Economics Consulting Group or the integrity of FECG management. FECG has no information applicable to this item.

Item 10 – Other Financial Industry Activities and Affiliations

Business Valuation and Litigation Support

Financial Economics Consulting Group provides Business Valuation services to clients seeking an independent appraisal of their business' worth. Our firm's approach is to integrate the theoretical structure of business valuation with today's business environment and practices. As assets managers, our firm provides a unique perspective regarding business valuation and builds upon such with strong qualifications and experience. The worth of a company will be determined by assessing the intrinsic value of its assets and the value of the company's earnings and cash flow. Thus, the essence of valuation analysis is to determine the worth of a company's equity in the marketplace.

Assignments in which we have been involved range from valuations required for estate tax purposes to those assessing the sale or purchase of a business. Examples of the need for business valuation services include the following:

- Buy/Sell Agreements
- Litigation Appraisals
- Estate Tax Appraisals
- Sale of Closely-Held Business
- Valuation for Loan Purposes
- Valuation for Stock Options
- ESOP and PAYSOP

All business valuation assignments are supported by well-documented written reports. Each report is prepared in accordance with the client's defined assignment and supported by generally accepted financial valuation techniques. References and additional information are available upon request. Fees for Business Valuations are negotiated, with the typical business taking 50 hours to value. All valuations are supported by documented written reports prepared in accordance with the client's defined assignment and supported by generally accepted financial valuation techniques.

FECG also provides litigation support including expert witness testimony and consultation for a wide array of cases requiring economic and financial analysis and expertise. Fees are \$350 per hour plus expenses for testifying experts. Associates are billed at other negotiated rates.

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

Section 204 of the Investment Advisors Act of 1940 and rule amendments require all registered investment advisors to adopt a Code of Ethics. FECG has adopted a Code of Ethics emphasizing the firm's commitment to ethical conduct. The Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and FECG's standards of business practice of supervising the personal securities transactions of employees with access to client information.

Individuals associated with FECG may buy or sell securities for their personal accounts identical or different than those recommended to clients. Employees must place the best interest of the client first and may not prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients. To monitor compliance with its Code of Ethics, FECG requires that any person associated with the advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the firm's Compliance Officer. FECG requires access personnel to receive approval from the Chief Compliance Officer during a pre-clearance period of time.

FECG's Code of Ethics prohibits the use of material non-public information and protecting the confidentiality of client information. All employees are required to act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

FECG has adopted a Code of Ethics that provides guidelines for professional conduct and implemented controls outlined in the firm's policy and procedures manual to insure compliance by all personnel.

A complete copy of FECG Code of Ethics is available to all clients upon request. The Code of Ethics covers all of Financial Economics Consulting Group's employees and is based upon the fundamental principles of openness, integrity, honesty, and trust.

Item 12 – Brokerage Practices

FECG executes trades through the broker/custodian for each account unless specified differently by the client. The firm recommends the use of a low cost brokerage in order to minimize the transaction cost on each transaction. Our clients can use either a discount broker or a full service firm. Upon opening an account, we explain that a full service broker may cost more and allow the client to make the choice based upon the amount of contact that they will want with the custodian, their comfort with the format for information and statements supplied and the type of information the client requires from the custodian. FECG has compared the basic and per share commission with similar custodians offering similar services in the industry to insure that, clients are receiving appropriate commission charges.

FECG has only limited authority in all accounts to purchase and sell securities and select the type of money market account that is employed in the account. FECG has no authority to transfer assets or withdraw assets or cash from a client account and transaction of this nature require client authorization.

The firm has no soft dollar arrangements with any firm or company for research, recommendations, newsletters, etc. The primary factor in the decision to own a security is the cost, efficiency and effectiveness in the execution of orders as they are placed for our clients. Other important factors include the quality of the Custodial and record keeping services provided to the client. Whether the client selects a full service or non-discount broker, FECG will work to negotiate a discount on the commissions paid by our client. The firm has established an investment advisors master account with Charles Schwab as the designated discount broker when the client agrees.

We do not make recommendations to use a specific brokerage for the sole purpose of obtaining information or research data and none of our accounts have been directed for that purpose. Any information obtained from a brokerage firm is for the benefit of all our clients. Any information not provided as part of their association is purchased by FECG with hard dollars to avoid all possibilities for conflict of interest.

FECG may recommend that clients establish brokerage accounts with Charles Schwab & Company, a registered broker-dealer, member SIPC to maintain custody of clients' assets and to effect trades for their accounts. There is no charge for custody. Account holders compensate Schwab by commissions or by other transaction related fees for securities trades executed through Schwab or that settle into Schwab accounts. Information regarding Schwab's fee for services is available to clients upon request. Basic fees such as commission for trades, wire transfer fees, etc. are disclosed during the initial account opening. Schwab provides advisory firms with access to its institutional trading and custody services that are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge with a minimum of at least \$10 million of the advisors assets under management maintained in accounts at Charles Schwab. These services include brokerage, custody, research, access to mutual funds and other investments usually

available to only institutional investors or require a significantly higher minimum initial investment.

In addition, Schwab makes other products and services available to FECG that benefit the firm in decision making processes that also benefit its clients' accounts.

FECG is independently owned, operated, and not affiliated with Schwab.

Item 13 – Review of Accounts

For managed accounts specific assets, asset mix and activity are monitored regularly. The same accounts are reviewed in detail on an account-by-account basis at least quarterly. The quarterly analysis considers prevailing investments owned with current economic, market and client goals and objectives. Reports are provided to the clients based upon their individual request for information. Our flexibility allows the client to request an individual meeting whenever there is a need for more information or when client objectives change. The investment advisors review all client accounts to insure that all assets comply with authorized investment goals, the risk characteristics of the client and all activity is accurate.

Each account receives a monthly statement from the custodian that lists the assets owned with market values, all activity that took place during the month – purchases, sales, income, deposits, or withdrawals, available cash and estimates of annual income. The applicant receives a copy of the same statement that is reviewed to verify that the activity was authorized, is correct and applied to the proper account. This information is stored in our internal computer records as it is provided, hard copy or on electronic media in the clients file.

Reports are available to clients as requested to provide specific information on what the client owns and what has taken place in the account. If the client chooses, FECG may provide managed accounts with reports that list the asset mix, cost and market value of each asset along with the total portfolio and estimated annual income quarterly, annually or for a given period, as requested. Additional reports available are income, purchases and sales and realized gains/losses for the period and the year. We review the account structure and results relative to the clients stated goals, risk parameters, income requirements and stated needs. The nature of our management is on a client-by-client basis.

Financial planning clients direct the frequency of their reviews and the information and material that they wish covered by the objectives that they have established and when they determine a review is needed. They pay an hourly rate as listed in the fee schedule provided on a previous page of this brochure and billed in arrears for the services provided. The reviews are completed by the firm's Certified Financial Planner.

Item 14 – Client Referrals and Other Compensation

FECG receives no other compensation for client referrals. However, as indicated in Item 12 FECG utilizes Charles Schwab as custodian for client assets and as investment advisors are provided an array of services that are not available to retail investors. The services are available to independent investment advisors on an unsolicited basis at no charge to the firm.

The products and services provided benefit FECG in managing and administering clients' accounts but may not benefit the clients' accounts. These services include software and other technology providing access to client account data (trade confirmations, account statements, tax documentation), facilitate trade execution (allocation of aggregated trade orders for multiple clients) provide research, pricing information, and other market data, facilitate payment of FECG fees from the clients' accounts and assist with back office functions such as a back-up for record keeping. The service may service all or a substantial number of client accounts.

In addition, recommended custodians/brokers provide material to assist FECG manage and further develop its business including but not limited to publications, conferences on practice management, information technology, regulatory compliance, and business succession. FECG does not enter into any commitments with the custodian/broker for transaction levels in exchange for any services or products.

FECG recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to FECG and their clients of the availability of some of the foregoing products and services provided by Schwab, which may create a potential conflict of interest. Clients retain the right to make their final account decision.

Item 15- Custody

Financial Economics Consulting Group, Inc. does not custody any client assets. Clients receive monthly statements from the custodian. A client may request a copy of their statement at any time from the custodian and/or Financial Economics Consulting Group, Inc. Online access from the custodian is available for client account statements, trade confirmations, and tax information.

FECG encourages clients to carefully review monthly statements and compare such official custodial records to account statements that may be provided by FECG. Our statements may vary from custodial statements based upon reporting dates, valuation methodologies of securities, or accounting procedures.

Item 16 – Investment Discretion

Financial Economics Consulting Group, Inc. exercises discretion in determining which securities are purchased and the amount of the securities purchased through written authority by its clients. FECG utilizes its discretion in these matters within the limitations specified in the client agreement and a client may change or amend these limitations as required. Such amendments shall be submitted in writing.

FECG refers to the investment policy, limitations and restrictions of its clients when selecting securities and determining amounts. Investment guidelines and restrictions must be provided in writing to FECG.

Item 17 – Voting Client Securities

FECG will assist clients with Proof of Claim information to submit claims for security class action suits, but will neither advise nor act on behalf of the client in legal proceedings involving companies of securities held or previously held in the client account(s), including but not limited to, the filing of “Proofs of Claim” in class action settlements. Copies of the transactions will be sent to the client to attach to the claim form, but each client is responsible for filing their individual claim(s) with the companies. FECG will make reasonable efforts to collect and forward such information to the clients in a timely manner.

Clients are provided with Issuer Communication disclosure, proxy voting responsibilities and options at the time of account opening. It is the decision of the individual client to provide authority to FECG or retain their authority to receive and vote the proxies. Clients are informed of their right to take responsibility of all stockholder communication and voting responsibility. If client elects to provide FECG authority, FECG shall be responsible for voting proxies for individual client securities, making all elections relative to any mergers, acquisitions, tender offers, or other types of events pertaining to the assets. It is the general policy of FECG to vote proxies in the best interest of their clients. FECG shall monitor corporate actions of individual issuers and investment companies consistent with FECG’s fiduciary duty to vote proxies in the best interest of its clients. With respect to individual issuers, FECG may be solicited to vote on matters including corporate governance, adoption or amendments to compensation plans (including stock options), and matters involving social issues and corporate responsibility. FECG shall maintain records pertaining to proxy voting as required by Rule 204-2(c)(2) and are available upon written request. In addition, information pertaining to how FECG voted on any specific proxy issue is also available upon request.

Item 18 – Financial Information

Registered investment advisors are required to provide clients with specific financial information or disclosures regarding Financial Economics Consulting Group's financial state. FECG has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to our clients and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

The following individuals are the principal executive officers and management personnel for FECG:

Stephen W. Reinhart, President & Chief Compliance Officer received a B.S. Degree in Finance and Master of Arts degree in Corporate Finance from the University of Alabama. Prior to founding the firm with Robert McLeod in 1985, Steve spent ten years with First National Bank of Tuscaloosa. During this time, he held the positions of Vice-President and Trust Investment Office and managed over 400 million in trust and bank investments. In addition to serving as President of FECG and overseeing the Investment Management division Steve occasionally serves as an instructor at the University of Alabama.

Robert W. McLeod, Vice President/Secretary/Treasurer holds a B.S. Degree in Finance and a Master's Degree in Business Administration from the University of Southern Mississippi, and received a Doctor of Philosophy Degree in Finance from the University of Texas at Austin. Before coming to the University of Alabama Robert taught at the University of Central Florida and Louisiana State University. While lending his expertise to each area of the firm his specialties are Litigation Support and Business Valuations. Robert continues to serve as Professor of Finance at the University of Alabama and has contributed numerous articles to both academic and professional publications. He holds the professional designations of Chartered Financial Analyst, Certified Financial Planner, Chartered Life Underwriter and Accredited Valuation Analyst.

FECG is not engaged in any business activity other than giving investment advice.

Neither FECG nor our supervised persons are compensated for advisory services with performance-based fees.

We are required to disclose all material facts regarding certain legal or disciplinary events pertaining to arbitration awards or other civil, regulatory or administrative proceedings in which our firm or management personnel were found liable or against whom an award was granted. Our firm and our management personnel have no reportable disciplinary events to disclose.

Neither FECG nor our management personnel have a relationship or arrangement with any issuer of securities.