

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

Name of Investment Adviser: Permanent Value, Inc.				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
2221 Camino del Rio S, Ste 308	San Diego	CA	92108	(619) 682-3834

**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 government authority.**

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(Schedules 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.)

SEC 1701 (8/98)

Beverly Hills Regulatory Consultants Group, Inc.

FORM ADV**Part II - Page 2**

Applicant:	SEC File Number:	Date:
Permanent Value, Inc.	801- 63878	05/03/2006

Definitions for Part II

Related person - Any officer, director or partner of applicant or any person directly or indirectly controlling, controlled by, or under common control with the applicant, including any non-clerical, non-ministerial employee.

Investment Supervisory Services - Giving continuous investment advice to a client (or making investments for the client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client's personal and family obligations.

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. Approx. (See instruction below.)	
Applicant:			
<input checked="" type="checkbox"/>	(1) Provides investment supervisory services		100%
<input type="checkbox"/>	(2) Manages investment advisory accounts not involving investment supervisory services		%
<input type="checkbox"/>	(3) Furnishes investment advice through consultations not included in either service described above		%
<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--Solicit
D. For each checked box in A above, describe on Schedule F:			
<ul style="list-style-type: none"> 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).

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Applicant: Permanent Value, Inc.	SEC File Number: 801- 63878	Date: 05/03/2006
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3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Equity Securities
(1) exchange-listed securities
<input checked="" type="checkbox"/> (2) securities traded over-the-counter
<input checked="" type="checkbox"/> (3) foreign issues | <input checked="" type="checkbox"/> H. United States government securities |
| <input type="checkbox"/> B. Warrants | <input type="checkbox"/> I. Options contracts on:
(1) securities
(2) commodities |
| <input checked="" type="checkbox"/> C. Corporate debt securities
(other than commercial paper) | <input type="checkbox"/> J. Futures contracts on:
(1) tangibles
(2) intangibles |
| <input type="checkbox"/> D. Commercial paper | <input type="checkbox"/> K. Interests in partnerships investing in:
(1) real estate
(2) oil and gas interests
(3) other (explain on Schedule F) |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> F. Municipal securities | |
| <input type="checkbox"/> G. Investment company securities
(1) variable life insurance
<input 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 type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input 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 checked="" 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 type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

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

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Applicant:	SEC File Number:	Date:
Permanent Value, Inc.	801-63878	05/03/2006

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 checked="" 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.)

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

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Applicant:	SEC File Number:	Date:
Permanent Value, Inc.	801-63878	05/03/2006

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.)

- 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.

The focus of the company is on the review of stocks and mutual funds held in client's portfolios. Each analysis is centered on a comparison between Permanent Value's intrinsic valuation of a company's stock and the current market valuation. This comparison analysis is the basis for the portfolio manager's recommendations to the client. The average number of clients per manager is 70 and results are calculated accordingly.

Reviews:

- Daily – Transactions posted, account openings, transfers and confirmations received are reviewed for accuracy.**
- Monthly – Selected accounts are reviewed for accuracy and conformance with investment policy. Performance of recommended stocks and mutual funds are reviewed.**
- Quarterly – Every stock and mutual fund held in client's portfolios is reviewed by the investment advisor. A full detailed analysis is performed to assure proper asset allocations, investment guidelines and client-specific strategies are met.**
- Yearly – A full detailed analysis is performed yearly for each stock and mutual fund held in client's portfolio.**

Reviewers:

All reviews are initiated automatically by the portfolio manager and his assistant(s). Errors, discrepancies or questionable items are referred to the responsible adviser representative for resolution and any corrective action necessary. Problems or questions that cannot be resolved at that level are referred to the President.

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

Clients receive quarterly statement containing information about the portfolio, performance, and all investments are issued by the portfolio manager. All client accounts are in "street names. The custodian where the account is held gets only a monthly statement. A newsletter which accompanies this report provides comments on general stock market conditions and our investment philosophy.

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

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Applicant:	SEC File Number:	Date:
Permanent Value, Inc.	801-63878	05/03/2006

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 checked="" type="checkbox"/> | No
<input type="checkbox"/> |
| (4) commission rates paid? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |

- B. Does applicant or a related person suggest brokers to clients?
- | | | |
|--|--|--------------------------------|
| | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |
|--|--|--------------------------------|

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
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |
|--|--|--------------------------------|
- B. Directly or indirectly compensates any person for client referrals?
- | | | |
|--|---------------------------------|---|
| | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
|--|---------------------------------|---|

(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
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
|--|---------------------------------|---|

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

Applicant:	SEC File Number:	Date:
Permanent Value, Inc.	801- 63878	05/03/2006

Permanent Value, Inc.		IRS Empl. Ident. No.: 33-0688880															
Item of Form (identify)	Answer																
Item 1(D)	<p><i>Advisory Services and Fees</i> Permanent Value, Inc. (hereinafter "PVI" or the "Firm") is a corporation, formed under the laws of the State of Delaware, and registered with the Securities and Exchange Commission as a registered investment adviser. PVI offers investment advisory services to individuals, pensions and profit sharing plans, trusts, estates, charitable organizations, corporations or other organizations. This Schedule F narrative provides clients with information regarding PVI and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory client of the Firm.</p> <p>Please contact Mr. Nathaniel Ritchison, Chief Compliance Officer, if you have any questions about this Schedule F narrative. Additional information about PVI is available on the Internet at "www.adviserinfo.sec.gov". You can search this site by a unique identifying number, known as a CRD number. The CRD number for PVI is 118024.</p> <p>Individuals associated with PVI will provide its investment advisory services. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on behalf of the Firm. Such individuals are known as Investment Adviser Representatives (IARs).</p> <p><i>Portfolio Management Services</i> PVI provides discretionary portfolio management services where the investment advice provided is custom tailored to meet the individualized needs and investment objectives of the client. Subject to any written guidelines, which the client may provide, the Firm may be granted the discretion and authority to manage the account by the client. Accordingly, PVI is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include the determination of securities to be purchased/sold, the amount of securities to be purchased/sold, broker or dealer to be used, and commission rates to be paid. Once the portfolio is constructed, PVI provides continuous supervision of the portfolio as changes in market conditions and client circumstances may require.</p> <p>On an annualized basis, PVI's annual fee for investment management services provided shall be the greater of either \$1,188 (\$99 per month) or as follows:</p> <table border="0"> <thead> <tr> <th></th> <th><u>Annually</u></th> <th><u>Quarterly</u></th> </tr> </thead> <tbody> <tr> <td>Accounts to \$100,000.....</td> <td>2.00%</td> <td>0.50%</td> </tr> <tr> <td>Additional value to \$500,000.....</td> <td>1.75%</td> <td>0.438%</td> </tr> <tr> <td>Additional value to \$1,000,000.....</td> <td>1.50%</td> <td>0.375%</td> </tr> <tr> <td>Additional value over \$1,000,000.....</td> <td>1.25%</td> <td>0.313%</td> </tr> </tbody> </table> <p>In limited circumstances, PVI may negotiate a fixed fee and/or provide services on a per hour basis. The final fee will be based on the complexity of the client's financial situation and the portfolio(s) to be managed. The annual fees for portfolio management services may be billed quarterly in advance or arrears and are based on the market value of the assets under management at the time of billing. The fee-paying arrangements for fixed and/or hourly charges will be determined on a case-by-case basis and will be detailed in the signed agreement for services. The client will be invoiced directly for the fees, and fees will be assessed pro rata in the event the management agreement is executed at any time other than</p>			<u>Annually</u>	<u>Quarterly</u>	Accounts to \$100,000.....	2.00%	0.50%	Additional value to \$500,000.....	1.75%	0.438%	Additional value to \$1,000,000.....	1.50%	0.375%	Additional value over \$1,000,000.....	1.25%	0.313%
	<u>Annually</u>	<u>Quarterly</u>															
Accounts to \$100,000.....	2.00%	0.50%															
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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

Applicant:	SEC File Number:	Date:
Permanent Value, Inc.	801- 63878	05/03/2006

Permanent Value, Inc.		IRS Empl. Ident. No.: 33-0688880
Item of Form (identify)	Answer	
Item 1(D) (continued)	<p>the first day of a calendar quarter.</p> <p><i>Advisory Consulting Services</i></p> <p>PVI will provide advisory consulting services, which will usually consist of the evaluation of various investment options associated with client funds, typically taxable or tax-exempt bond proceeds, operating funds, and program revenues. The services and recommendations provided will be advisory in nature, and based upon an analysis of the clients individual needs. Although the Advisory Consulting Services will often times be provided to clients that have engaged the Firm for portfolio management services, the Firm may offer this service to any other client in need of such services.</p> <p>Advisory Consulting services are provided on a fixed fee basis in accordance with the following fee schedule:</p> <ul style="list-style-type: none">▪ Fixed Fees: Fixed fees for PVI's Advisory Consulting services is \$2,500.00. PVI requires payment of the services provided upon completion of the contracted services. <p>When the scope of the advisory consulting services has been agreed upon, a determination will be made as to the type and amount of the applicable fee. The final fee, subject to negotiation, is directly dependent upon the facts and circumstances of the client's financial situation and the complexity of the advisory program service(s) requested. The fees charged for services provided will be detailed in the signed agreement with the Firm. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, PVI will notify the client and may request that the client pay an additional fee.</p> <p>Either party may terminate the agreement by providing written notice to the other party within five (5) days of entering into the agreement. The client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the client. Refunds will be given on a pro-rata basis as applicable.</p> <p><i>General Information on Advisory Services and Fees</i></p> <p>Advisory recommendations are based on the client's financial situation at the time the services are provided and are based on financial information disclosed by the client to PVI. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. As the client's financial situation, goals, objectives, or needs change, the client must notify PVI promptly.</p> <p>PVI shall never have custody of any client funds or securities, as the services of a qualified and independent custodian will be used for these asset management services.</p> <p>The fees charged are calculated as described above, and are not charged on the basis of a</p>	

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

Applicant:	SEC File Number:	Date:
Permanent Value, Inc.	801- 63878	05/03/2006

Permanent Value, Inc.		IRS Empl. Ident. No.: 33-0688880																																																													
Item of Form (identify)	Answer																																																														
Item 1(D) (continued)	<p>share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory client (15 U.S.C. §80b-5(a)(1)).</p> <p>Advice offered by PVI may involve investments in money market funds. Clients are hereby advised that all fees paid to PVI for investment advisory services are separate and distinct from the fees and expenses charged by money market funds (described in each fund's prospectus) to their shareholders. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Further, there may be transaction charges involved with purchasing or selling of securities. PVI does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the client funds or securities. The client should review all fees charged by money market funds, PVI, and others to fully understand the total amount of fees to be paid by the client.</p>																																																														
Item 5	<p><i>Education and Business Standards</i></p> <p>PVI requires that its Investment Adviser Representatives either to have a college degree or five (5) years of business experience or both.</p>																																																														
Item 6.	<p><i>Education and Business Background</i></p> <p>Bruce William Doole</p> <table> <tr> <td>Born</td> <td></td> <td></td> <td>1966</td> </tr> <tr> <td>Red Bank Regional High School</td> <td></td> <td></td> <td>1984</td> </tr> <tr> <td>Virginia Tech</td> <td>BA</td> <td>Business / History</td> <td>1988</td> </tr> <tr> <td>Monmouth University</td> <td>MBA</td> <td>Finance</td> <td>1991</td> </tr> <tr> <td>R&D Financial</td> <td>Registered Investment Advisor</td> <td>Owner</td> <td>1994-1996</td> </tr> <tr> <td>Permanent Value, Inc.</td> <td>Registered Investment Advisor</td> <td>President</td> <td>1996-Present</td> </tr> </table> <p>Nathaniel Theodore Ritchison</p> <table> <tr> <td>Born</td> <td></td> <td></td> <td>1980</td> </tr> <tr> <td>Mt. Carmel High School</td> <td></td> <td></td> <td>1998</td> </tr> <tr> <td>San Diego State University</td> <td>BS</td> <td>Finance / History</td> <td>2003</td> </tr> <tr> <td>Permanent Value Inc.</td> <td>Registered Investment Advisor</td> <td>Investment Advisor</td> <td>2002-Present</td> </tr> </table> <p>Ronald Perry Roth</p> <table> <tr> <td>Born</td> <td></td> <td></td> <td>1935</td> </tr> <tr> <td>The Lawrenceville School</td> <td></td> <td></td> <td>1951</td> </tr> <tr> <td>Dartmouth College</td> <td>BA</td> <td></td> <td>1953</td> </tr> <tr> <td>Arrowhead Mutual Fund Management</td> <td>Registered Investment Advisor</td> <td>Owner</td> <td>1991-2002</td> </tr> <tr> <td>Permanent Value Inc.</td> <td>Registered Investment Advisor</td> <td>Investment Advisor</td> <td>2002-Present</td> </tr> </table>			Born			1966	Red Bank Regional High School			1984	Virginia Tech	BA	Business / History	1988	Monmouth University	MBA	Finance	1991	R&D Financial	Registered Investment Advisor	Owner	1994-1996	Permanent Value, Inc.	Registered Investment Advisor	President	1996-Present	Born			1980	Mt. Carmel High School			1998	San Diego State University	BS	Finance / History	2003	Permanent Value Inc.	Registered Investment Advisor	Investment Advisor	2002-Present	Born			1935	The Lawrenceville School			1951	Dartmouth College	BA		1953	Arrowhead Mutual Fund Management	Registered Investment Advisor	Owner	1991-2002	Permanent Value Inc.	Registered Investment Advisor	Investment Advisor	2002-Present
Born			1966																																																												
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**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Permanent Value, Inc.	801- 63878	05/03/2006

Permanent Value, Inc.		IRS Empl. Ident. No.: 33-0688880
Item of Form (identify)	Answer	
Item 8(C)(9)	<p><i>Other Financial Industry Activity or Affiliations</i></p> <p>Permanent Value Risk Management is wholly owned by Permanent Value, Inc. Referrals are made each way by both companies with no additional cost to the client as a result of the referral.</p>	
Item 9(E)	<p><i>Participation or Interest in Client Transactions</i></p> <p>PVI or individuals associated with the Firm may buy or sell – for their personal account(s) - investment products identical to those recommended to clients. It is the expressed policy of PVI that no person employed by the Firm may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts. Furthermore, PVI or individuals associated with it must disclose their transactions by the tenth (10th) business day after each quarter and periodic inspections are conducted for compliance with this policy.</p> <p><i>Code of Ethics</i></p> <p>As these situations may represent a conflict of interest, PVI has established the following restrictions in order to ensure its fiduciary responsibilities:</p> <ul style="list-style-type: none"> ▪ PVI emphasizes the unrestricted right of the client to specify investment objectives, guidelines, and/or conditions on the overall management of their account. PVI's standard investment process begins with reviewing applicable state statutes, investment policy, and permitted investment language provided by the client. ▪ Associated persons or their immediate family members shall not buy or sell securities for their personal portfolio(s) where their decision is derived in whole or in part, by reason of the associated person's employment, unless the information is also available to the investing public on reasonable inquiry. No associated person of the Firm shall prefer his or her own interest to that of the advisory client. ▪ PVI and its associated persons generally may not purchase and sell securities being considered for, or held by client accounts without pre-clearance of the Firm's Compliance Officer. Moreover, investment personnel may be subject to a blackout period from trading in such securities. ▪ PVI and its employees generally may not participate in private placements or initial public offerings (IPOs) without pre-clearance from the Firm's Compliance Officer. ▪ The Firm requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices. ▪ Records will be maintained of all securities bought or sold by the Firm, associated persons of the Firm, and related entities. ▪ Any individual not in observance of the above may be subject to termination. 	

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

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Item 10.	<p>In accordance with Section 204-A of the Investment Advisers Act of 1940, PVI also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by PVI or any person associated with the Firm.</p> <p><i>Conditions for Managing Accounts</i></p> <p>Permanent Value Inc.'s business policy suggests a minimum dollar value of \$250,000 for full investment advisory services. However, this is only a general guideline to identify serious long-term investors. Each client is evaluated on a case-by-case basis.</p>	
Item 12(A) (1) & (2)	<p><i>Investment or Brokerage Discretion</i></p> <p>Clients may grant PVI complete discretion over the selection and amount of securities to be bought or sold without obtaining their prior consent or approval. However, the Firm's investment authority may be subject to specified investment objectives, guidelines, and/or conditions imposed by the client. For example, a client may specify that the investment in any particular debt instrument 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. Clients may amend these limitations as required. Such amendments must be submitted in writing.</p>	
Item 12(B)	<p><i>Suggestion of Brokers</i></p> <p>As mentioned previously, PVI may possess and exercise discretion to trade on any client accounts. However, it is important to note that PVI does not possess discretionary authority to select the broker or dealer to be used or the commission rates paid. In any event, PVI often suggests that clients execute trades through TD Ameritrade Institutional, a Division of TD Ameritrade, Inc., member NASD/SIPC ("TD Ameritrade, Inc."). TD Ameritrade is a trademark jointly owned by TD Ameritrade IP Company, Inc. and The Toronto-Dominion Bank.</p> <p>PVI reasonably believes that in the case of managed accounts, TD Ameritrade, Inc.'s blend of execution services, commission and transaction costs as well as professionalism allows PVI to seek best execution and competitive prices. Additionally PVI believes that in case of financial plan recommendations being implemented, that TD Ameritrade, Inc.'s blend of execution services, commission and transaction costs as well as professionalism allows PVI to recommend TD Ameritrade, Inc. for the establishment of a brokerage account. At all times, financial planning clients are free to execute their plan recommendations through any broker-dealer without the assistance of PVI or its investment advisory representatives. In certain cases, TD Ameritrade, Inc. may be suggested to financial planning clients as the executing broker-dealer for their financial plans.</p>	
Item 12B	<p>Also, PVI may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. PVI is independently owned and operated and not affiliated with Schwab. Schwab provides PVI with access to its institutional trading and custody services, which</p>	

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Item 13(A)	<p>are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets is maintained in accounts at Schwab Institutional. Schwab's services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.</p> <p>For PVI client accounts maintained in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts.</p> <p><i>Additional Compensation</i></p> <p>As part of its fiduciary duties to clients, PVI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by PVI [or its related persons] in and of itself creates a potential conflict of interest.</p> <p>Schwab also makes available to PVI other products and services that benefit PVI but may not benefit its clients' accounts. Some of these other products and services assist PVI in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of PVI fees from its clients' accounts; and assist with back-office functions, record-keeping and client reporting. Many of these services generally may be used to service all or a substantial number of PVI accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional also makes available to PVI other services intended to help PVI manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to PVI by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to PVI. While as a fiduciary, PVI endeavors to act in its clients' best interests, and PVI recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to PVI of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.</p> <p>As disclosed under Item 12.B. above, PVI participates in TD Ameritrade, Inc.'s institutional customer program and Adviser may recommend TD Waterhouse</p>	

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Item 13(A) Continued	<p>Ameritrade, Inc. to clients for custody and brokerage services. There is no direct link between Adviser's participation in the program and the investment advice it gives to its clients, although Adviser receives economic benefits through its participation in the program. These benefits include: receipt of duplicate client confirmations; access to a trading desk serving adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, technology, and practice management products or services provided to Adviser by third party vendors. The benefits received by Adviser [or its related persons] do not depend on the amount of brokerage transactions directed to TD Ameritrade, Inc.</p>	

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