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This brochure provides information about the qualifications and business practices of Snider Advisors. If you have any questions about the contents of this brochure, please contact us at 214-220-0055 or support@snideradvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Snider Advisors is also available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 120943.

ITEM 2 MATERIAL CHANGES

Material Changes since the Last Update

- Removed optionsXpress disclosure and conflict of interest. All agreements between Snider Advisors and optionsXpress have expired
- Updated Seminars section to current course offering (Page 5)
- Updated Securities Rating Services to include improvements in Lattco and LattcoPRO technology (Page 6)
- Addition of branch office in South Carolina (Page 4)
- As required by the Dodd-Frank Wall Street Reform and Consumer Protection Act, Snider Advisors will switch to state registration in 2012

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us via email at support@snideradvisors.com or visit our website at www.snideradvisors.com.

TABLE OF CONTENTS

| | |
|---|----|
| Part 2A of Form ADV | 1 |
| Item 2 Material Changes | 2 |
| Item 4 Advisory Business | 4 |
| Item 5 Fees and Compensation..... | 8 |
| Item 6 Performance-Based Fees..... | 11 |
| Item 7 Types of Clients | 11 |
| Item 8 Methods of Analysis, Investment Strategies and Risk of Loss | 12 |
| Item 9 Disciplinary Information | 14 |
| Item 10 Other Financial Industry Activities and Affiliations..... | 14 |
| Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading | 15 |
| Item 12 Brokerage Practices | 16 |
| Item 13 Review of Accounts..... | 18 |
| Item 14 Client Referrals and Other Compensation | 19 |
| Item 15 Custody | 20 |
| Item 16 Investment Discretion | 21 |
| Item 17 Voting Client Securities..... | 22 |
| Item 18 Financial Information..... | 22 |
| Item 19 Requirements for State-Registered Advisers | 23 |
| Part 2B of Form ADV | 24 |
| Chronim Investments | 24 |
| Kimberly A. Snider | 26 |
| James A. Hughes..... | 27 |
| Jesse G. Anderson, CFA | 28 |
| Shelley Seagler | 30 |
| Tyler Curtis..... | 31 |
| Joshua Stelzer | 32 |
| Thomas Doan | 33 |
| CareyAnn Peterson | 34 |

ITEM 4 ADVISORY BUSINESS

Firm Description

Chronim Investments, Inc. is a SEC-registered investment adviser with its principal place of business located in Texas. We also have a branch office in South Carolina. Chronim Investments, Inc. began conducting business in 2002. We conduct all investment business under the name Snider Advisors. As required by the Dodd-Frank Wall Street Reform and Consumer Protection Act, Snider Advisors will switch to state registration in 2012.

Snider Advisors offers educational and investment management products tailored to meet our clients' needs. Our investment management and consulting services are built to assist our clients in implementing the Snider Investment Method. The Snider Method is a systematic strategy with specifically defined steps to investing for cash flow. It uses a combination of stock, options and cash, along with specific techniques applied in a specific sequence to achieve our cash flow objectives. The Snider Method uses our proprietary stock selection tool "Lattco" to select stocks that fit within the parameters of the Snider Investment Method. In addition to Lattco, we also offer the option of "LattcoPRO", which assists clients with the bookkeeping necessary to implement the Snider Investment Method. In order to properly implement the Snider Method, clients must attend our Snider Investment Method seminar. It is not necessary to attend our seminar if you are seeking Asset Management services. Consulting services and Lattco are optional after successfully completing the Snider Investment Method seminar.

Should a client have certain restrictions on specific stock transactions, we can assist them in implementing the strategy with those restrictions accounted for. Ultimately, the clients' suitability for this investment strategy is required to be determined prior to the client attending our educational seminar.

Snider Advisors does not participate in any wrap fee programs.

Principal Owners

Listed below are the firm's principal shareholders. These are the individuals and/or entities controlling 25% or more of this company.

- Kimberly Ayn Snider, CEO
- James Anthony Hughes, CFO

Types of Advisory Services

SNIDER METHOD CONSULTING SERVICES

Our firm provides continuous advice to a client regarding the investment of client funds based on the Snider Method. We manage these accounts primarily on a non-discretionary basis. There are two levels of Consulting Services. Level I consists of periodic notices of events which may affect the trades called for by the method, answering questions from clients regarding the method in general or specific to their accounts, and assistance placing trades. Level II consists of all the Level I services plus determining all or substantially all of the trades to place in an account during a month. Level II may also include placing the trades on the client's behalf. We assume discretionary authority over the account for a limited period of time when a client makes such a request.

We gather data regarding a client's particular circumstances to determine if the Snider Method is a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. The Snider Method investments include:

- Exchange-listed securities
- Options contracts on securities
- United States governmental securities
- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

INDIVIDUAL ASSET MANAGEMENT

Our firm provides continuous regular asset management of client funds based on the Snider Method. We gather data regarding a client's particular circumstances to determine if the Snider Method is a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis following the Snider Method. The method considers factors such as liquidity needs, income objectives, risk tolerances, and tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Once the client's portfolio has been established, we perform the trades specified by the method each month.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Options contracts on securities
- United States governmental securities
- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Snider Advisors does not participate in any wrap fee programs.

SEMINARS

Snider Advisors conducts group educational workshops where clients learn the Snider Investment Method. The Snider Method is a long-term strategy designed to create income from your portfolio. It uses a combination of stock, options and cash, along with specific techniques applied in a specific sequence, to achieve these goals. We also offer an online version of the workshop.

Snider Advisors offers 3-day, full-day and online workshops covering many aspects of financial education. Previous courses included Introduction to Investments, Retirement Planning, Funding Healthcare, Converting your IRA to a Roth, Investing for Retirement, and Estate Planning. We plan to offer these courses in the future as well as new educational workshops based off course demand. Snider Advisor also offers an on-demand course about 401(k) investing. The course offers advice on how to properly manage many aspects of your 401(k) plan. You can watch the course as many times as you want. You also receive an Excel workbook with interactive tools and access to help by email or telephone.

FINANCIAL PLANNING

We provide financial planning services. Financial planning services vary based on the client's objectives and questions. The financial advisor may help the client with specific needs or perform an overall analysis. Clients who seek an overall analysis will receive a comprehensive evaluation of their current and future financial state by using client-furnished information and data. Specific financial planning needs may include, but are not limited to: investment advice, insurance consultations, benefits analysis, retirement planning, college education planning, tax planning, and estate planning.

Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. The financial advisor will make actionable recommendations for the client based on the results of the data gathering, research, and financial planning best practices. Clients pay an hourly fee for the time it takes to meet, research, and prepare recommendations.

Financial planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. Advisors are not compensated for the sale of any investment or insurance products. This reduces the potential conflict of interest between the interests of the client and the advisor. All financial plans are dynamic and should be revisited periodically to track progress and make changes as necessary. The client is responsible for initiating subsequent meetings and activities, and is under no obligation to implement the advisors recommendations. If the client chooses to implement the recommendations provided, they are under no obligation to execute these transactions through Snider Advisors.

SECURITIES RATING SERVICES

Snider Advisors provides a securities rating service called Lattco. This service is used to trade securities in the Snider Method. We exclude securities from consideration based on fundamental data, credit scoring methods, and liquidity measures (for the stock and the options on the stock).

Included securities are then ranked based on price, volatility, liquidity, and sector factors and presented to the client as investment recommendations. Subsequent investment recommendations regarding a particular security are determined by the algorithms of the Snider Method, which do not generally consider these factors after the initial Lattco recommendation.

LattcoPRO, an enhanced version of the rating service, includes a recordkeeping system for the investment strategy. It organizes clients' account and trading data to aid clients in the accurate implementation of our strategy.

Amount of Managed Assets

As of 12/31/2011, Snider Advisors was actively managing \$70,845,988 of clients' assets for 233 accounts or 150 client households on a discretionary basis.

ITEM 5 FEES AND COMPENSATION

INDIVIDUAL ASSET MANAGEMENT FEES

The annualized fee for Asset Management Services will be charged as a percentage of assets under management, according to the following schedule:

| <u>Assets Under Management</u> | <u>Annual Fee</u> |
|--------------------------------|-------------------|
| Less than \$500,000 | 2.50% |
| \$500,001 - \$2,000,000 | 2.00% |
| \$2,000,001 - \$5,000,000 | 1.50% |
| More than \$5,000,001 | 1.00% |

The minimum asset value for Asset Management Services is \$200,000. These fees are billed on a monthly basis, in arrears. The fees are based upon the asset value as of the end of the prior month as it appears on the brokerage statement. Clients receive an invoice for the fees which can either be deducted directly from their accounts by the broker, or charged to a credit card on file. If the client has arranged to have fees deducted from the account, the trustee will receive a copy of the invoice and will pay the fee.

The fee for each month for all the accounts owned by one individual or one trust is subject to a maximum, which is the fee for the smallest asset value for the next level. For example, accounts under \$500,000 will pay 1/12 of 2.5%, but not more than 1/12 of 2.0% of \$500,000. All the accounts owned by a client, spouse and minor children are aggregated to determine the fee percentage. Fees are prorated by days in any period in which the services terminate. Upon termination, any unpaid fees are due.

Snider Advisors offers a partial rebate against asset management fees for clients who purchase the Snider Investment Method™ course.

SNIDER METHOD CONSULTING / SECURITIES RATINGS SERVICES FEES

The monthly fee for Snider Method Level I Consulting Services is \$10 charged at the beginning of the month. The fee for Level II Consulting Services is \$100 per month. Uses of Level II services can be capped for any annual period.

The fee for Lattco is \$30 in any month in which the client uses the service, regardless of how many times the service is used during the month. All fees other than the \$10 fee are charged at the end of the month.

LattcoPRO is premier bookkeeping software that is offered to our clients for an additional fee. The fee for LattcoPRO is \$8 per position when activity is downloaded and includes the cost of searching for new positions (There is not an additional \$30 charge as in the original Lattco).

There is no minimum asset value for Snider Method Consulting Services, since clients are trading their own accounts. However, we recommend a minimum investment of \$25,000.

SEMINAR FEES

There is a one-time fee for the workshop (\$2,000 for the live Snider Investment Method workshop and \$2,000 for the online version, and fees varying from \$247 to \$2,000 for other courses). There is currently no separate charge for the on-demand 401(k) course. Any discounts and/or promotional offers on any of our services are offered at our discretion. We may also reduce or waive fees for workshop attendance for family and friends of our employees or certain vendors and associates of Snider Advisors.

There is a deposit payable when the client first registers for the class. The balance is due the day before the workshop. You may request a refund for any reason within 90 days of attending a seminar. Deposits are fully refundable for any reason.

FINANCIAL PLANNING FEES

Snider Advisors' Financial Planning fee will be determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Financial Planning fees are calculated and charged on an hourly basis at \$150 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship.

The client will be billed in arrears based on actual hours provided.

INSURANCE PRODUCT SALES

Certain employees of our firm are licensed to sell insurance. We typically will advise our clients on and provide Long-Term Care, Life, MediGap, Health and Disability Insurance products as agents of insurance companies. Snider Advisors as a company receives a commission from the sale of these policies. The employee does not receive any part of the commission. However, the volume of sales any employee achieves will likely have an impact on other discretionary incentive compensation programs, such as quarterly bonuses.

The incentives offered by insurance companies inherently cause a conflict of interest. We recognize this conflict and provide our clients with choices between several insurance companies to ensure that their needs are the primary focus. We explain the benefits and drawbacks of each product and allow the client to make the final decision on which insurance product or company to select.

GENERAL INFORMATION

Termination of the Advisory Relationship: A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. As disclosed above, the only fee paid in advance is the \$10 monthly consulting fee. Upon termination, this monthly fee is not prorated and no refund is provided for the balance of the month. At termination of any other services, the accrued, unpaid fees are due and payable. In calculating asset management fees, we will pro rate the final fee according to the number of days remaining in the billing period. The advisory relationship will automatically terminate 14 days after attending a seminar unless additional services are requested.

ETF Fees: All fees paid to Snider Advisors for investment advisory services are separate and distinct from the fees and expenses charged by ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in an ETF directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the ETFs and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer or custodian. Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Grandfathering of Minimum Account Requirements: Pre-existing advisory clients are subject to Snider Advisors' minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

ERISA Accounts: Snider Advisors is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Snider Advisors may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Snider Advisors' advisory fees.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$500 more than six months in advance of services rendered.

Negotiation of Fees: Snider Advisors reserves the right to negotiate individual fee agreements and/or run fee discounts or limited time specials on pricing.

*Lower fees for comparable services may be available from other sources

ITEM 6 PERFORMANCE-BASED FEES

Snider Advisors does not charge performance-based fees.

ITEM 7 TYPES OF CLIENTS

Snider Advisors provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- Corporations, partnerships and other entities
- High net worth individuals

As previously disclosed in Item 5, our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis. The Snider Method attempts to identify fundamentally sound companies with high price volatility. To do this, we use credit scoring techniques which use fundamental data.

This fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Asset Allocation. Our proprietary stock screener, Lattco, is able to diversify positions among various industry sectors. The Snider Method attempts to balance cash and positions in securities to produce stable income.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

We use the Snider Method investment strategy. This strategy combines stock purchases, option sales, and cash balances with the objective of providing current income.

Long-term purchases. We purchase securities we may potentially hold for long periods of time. The risks of holding securities for long periods of time is the stock may decline in price or go bankrupt.

Short-term purchases. We purchase securities we may potentially hold for short periods of time. The risks of holding securities for short periods of time and replacing them with other stocks is higher transactions costs.

Margin transactions. The Snider Method occasionally requires you to purchase stocks with money borrowed from your broker. This allows you to purchase more stock than you would be able to with your available cash. You must pay margin interest on the amount of money borrowed from your broker.

A risk in margin trading is that, in volatile markets, securities prices can fall very quickly. If the value of the securities in your account minus what you owe the broker falls below a certain level, the broker will issue a “margin call”, and you will be required to sell your position in the security purchased on margin or add more cash to the account. In some circumstances, you may lose more money than you originally invested.

Option writing. We use options as part of our investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives the buyer the right to buy an asset at a certain price within a specific period of time in exchange for a premium paid to the seller. We typically sell calls as part of our investment strategy.
- A put gives the buyer the right to sell an asset at a certain price within a specific period of time in exchange for a premium paid to the seller. We typically sell puts as part of our investment strategy.

We use covered calls and cash-secured puts, in which we sell options on securities we own (or have earmarked cash to buy). In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price. When calls are exercised, clients are forced to sell their security at the strike price of the call option. This is likely below the market value of the security. When a put is assigned, clients are forced to purchase the security at the strike price of the put option. This is likely at a price above the market value of the security.

Some of the risks of this strategy are: 1) We own the stock, so if the price declines we have an unrealized loss. 2) We give away some of the potential price increase because we agreed to sell the security at the option strike price. 3) We own the stock, so if the company goes bankrupt we have a realized loss.

Risk of Loss

Securities investments are not guaranteed and you may lose money on your investments. Investing in securities involves risk of loss that clients should be prepared to bear. We ask that you work with us to help us understand your tolerance for risk.

ITEM 9 DISCIPLINARY INFORMATION

Legal and Disciplinary

Our firm and our management personnel have no reportable disciplinary events to disclose.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Insurance Products

Certain employees of our firm are licensed to sell insurance. We typically will advise our clients on and provide Long-Term Care, Life, MediGap, Health and Disability Insurance products as agents of insurance companies. Snider Advisors as a company receives a commission from the sale of these policies. The employee does not receive any part of the commission. However, the volume of sales any employee achieves will likely have an impact on other discretionary incentive compensation programs, such as quarterly bonuses.

The incentives offered by insurance companies inherently cause a conflict of interest. We recognize this conflict and provide our clients with choices between several insurance companies to ensure that their needs are the primary focus. We explain the benefits and drawbacks of each product and allow the client to make the final decision on which insurance product or company to select.

As mentioned previously, we do recommend and provide insurance based products on occasion to fill the needs of our current clients. The following individuals are licensed insurance representatives:

Jesse G. Anderson – Less than 5% of time allocated to insurance products and registered in Texas

Joshua Stelzer – Less than 5% of time allocated to insurance products and registered in Texas

Shelley Seagler – 35% of time spent on insurance solutions. Registered in the following states: Texas, Arizona, California, Colorado, Georgia, Pennsylvania and Utah

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Snider Advisors and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Snider Advisors' Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to support@snideradvisors.com, or by calling us at 214-220-0055.

Participation or Interest in Client Transactions

Snider Advisors and individuals associated with our firm are prohibited from engaging in principal transactions and agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Personal Trading

Our employees are allowed to personally partake in our investment method with their personal assets. Our investment method consists of trading once on a month on the first Monday following options expiration. Individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in securities which may also be recommended to a client.

It is the policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

To address this conflict of interest we have implemented a strict “black out” period on all securities trading for our employees to prevent them from trading prior to or during normal Snider Method trading periods. It includes our Trade Day and the 7 days preceding it (Trade Day is the Monday after option expiration). All employees have duplicate brokerage statements for personal accounts submitted to our Chief Compliance Officer on a monthly basis to ensure this “black out” period policy is followed.

ITEM 12 BROKERAGE PRACTICES

Selecting Brokerage Firms

Snider Advisors does not have the authority to determine the broker/dealer to be used by our clients or commission rates paid by our clients without obtaining specific client consent. However, we do suggest broker(s) to our clients and we do require managed accounts be opened at our recommended broker/dealer(s).

The factors we consider when recommending broker/dealer(s) to clients include financial strength, reputation, execution, pricing, research, and service. Commission rates for recommended broker(s) are generally considered discounted from customary retail rates, but may be higher or lower than those charged by other broker/dealer(s). We will only establish accounts with broker/dealer(s) that provide timely service and fair price. We chose to recommend a single broker because of the technology support we require, as well as, the necessity for us to be experts using the trading platform that the majority of our clients use.

Our Asset Management clients must open an account at brokersXpress, an affiliate of optionsXpress. We do not have the technological and operational infrastructure to accommodate client trading through other broker-dealers. We recommend, but do not require, consulting clients to open an account at optionsXpress.

Snider Advisors uses optionsXpress and brokersXpress for our trading purposes. We do not have any outside relationship with these entities beyond the scope of trading on their platform. We also make annual evaluations of alternative broker/dealers to ensure that our clients are receiving the value and service they deserve. If we were to find a better broker/dealer, we have no reservations of making a transition at that time.

As a fiduciary, Snider Advisors has an obligation to act in the best interest of its clients and to place its clients' interests before its own. We have the responsibility to regularly and frequently evaluate our recommendations of broker/dealers to ensure our clients are getting the Best Execution available.

Client transactions generally will be made independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine such orders to obtain best execution, better commission rates, or to allocate equitably among our clients differences in prices, commissions, or other transaction costs that might have been obtained if the orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among our clients pro rata to the purchase and sale orders placed for each client on any given day. The extent we aggregate client orders for the purchase or sale of securities are in accordance with the parameters set forth in SEC No-Action Letter, SMC Capital, Inc. We will not receive any additional compensation or remuneration as a result of the aggregation.

Consulting clients may decide to use a particular broker-dealer to execute some or all of their transactions. In that case, the client will have the sole responsibility for negotiating commission rates and other transaction costs with the broker/dealer. If a client selects a specific broker, we will not be required to effect any transaction through the specified broker if we reasonably believe that to do so may result in a breach of fiduciary duties. We will not seek better execution services or prices from other broker-dealers or be able to batch client transactions for execution through other broker-dealers with orders for other accounts managed by Snider Advisors. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Soft Dollars

Snider Advisors does not have any soft-dollar arrangements with any brokers.

ITEM 13 REVIEW OF ACCOUNTS

Asset Management Services

REVIEWS: While the underlying securities within Asset Management Services accounts are continually monitored, these accounts are reviewed monthly. Accounts are reviewed in the context of the Snider Method.

These accounts are reviewed by Jesse Anderson, the Chief Investment Officer of Snider Advisors.

REPORTS: In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide monthly and annual reports summarizing account performance.

Snider Method Consulting Services

REVIEWS: Accounts are not reviewed for clients who use Consulting Services, since these clients are primarily responsible for trading their own accounts using the methods taught in our seminars. Snider Advisors personnel are available to review account at the request of the client.

REPORTS: Clients will typically receive monthly statements and confirmations of transactions from their broker-dealer. Snider Advisors will not provide additional reports.

Financial Planning Services

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

REPORTS: Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

Incoming Referrals

Snider Advisors has been fortunate to receive many client referrals over the years. The referrals have come from current clients, accountants, employees, personal friends of employees and other sources. The firm does not pay for referrals.

Referrals to Other Professionals

Snider Advisors does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

Snider Advisors receives from optionsXpress, without cost, access to computer software and related systems support. This allows us to better monitor client accounts maintained at optionsXpress. We may also receive from optionsXpress, without cost, stock and option market data. This allows us to automate transactions with our recommended broker. These services are typically offered on similar terms by optionsXpress to all its affiliated advisors and retail clients.

ITEM 15 CUSTODY

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Our firm does not have actual or constructive custody of client accounts or funds.

ITEM 16 INVESTMENT DISCRETION

Discretionary Authority for Trading

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm. They may not limit this authority.

Clients may hire us to provide nondiscretionary consulting services, in which case we place trades in a client's account only if specifically requested by the client. Clients may also request that we perform the monthly trades specified by the Snider Method if they are unable to access the market when required to do so. These Vacation Trade requests trigger a short window of time in which we have discretionary authority to place trades in their accounts.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign our client agreement, sign a limited trading authorization, and request a Vacation Trade. They may not limit this authority.

ITEM 17 VOTING CLIENT SECURITIES

Proxy Votes

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

ITEM 18 FINANCIAL INFORMATION

Financial Condition

Snider Advisors does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because Snider Advisors does not serve as the custodian for client funds or securities, and does not require payment of fees of more than \$500 per client, six months or more in advance.

Snider Advisors has not been the subject of a bankruptcy petition at any time.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Principal Executive Officers and Management Persons

The principal executive officers and management persons for Snider Advisors are Kimberly A. Snider (CEO), James A. Hughes (CFO) and Jesse Anderson (COO, CIO, CCO). Their formal education and background information can be found on Part 2B of the firm's ADV brochure.

As previously mentioned, Snider Advisors does offer insurance solutions for current clients. We have three advisors licensed to sell insurance on behalf of the firm. Those individuals are Jesse Anderson, Joshua Stelzer and Shelley Seagler. All licensing and percentage of work information can be found in the firm's Form ADV Part 2B (firm brochure). No advisor at Snider Advisors is compensated by commission for the sale of insurance products.

In regards to fees and compensation, Snider Advisors does not participate in compensation for performance-based fees, nor does any advisor at Snider Advisors have any relationship with any issuer's of securities.

No employee of Snider Advisors has ever been charged with, or been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

We affirm that all material conflicts of interest are disclosed in this document regarding Snider Advisors, and all representatives or employees of Snider Advisors, which could be reasonably expected to impair the rendering of unbiased and objective advice.

PART 2B OF FORM ADV: *Brochure Supplement*

CHRONIM INVESTMENTS, Inc. dba Snider Advisors

Business Address: 222 W. Las Colinas Blvd Suite 543E, Irving, TX 75039

Business Phone: (214)220-0055

Email: support@snideradvisors.com

Web: www.snideradvisors.com

This Form ADV Part 2B, also called the “Brochure Supplement,” provides information about the following supervised persons employed by Chronim Investments, Inc. dba Snider Advisors (all addresses are c/o Snider Advisors address above):

Kimberly Snider, President / Chief Executive Officer

Direct Line: (214)446-8540

James Hughes, Chief Financial Officer

Direct Line: (214)446-8520

Jesse G. Anderson, Chief Operations Officer / Chief Investment Officer / Chief Compliance Officer

Direct Line: (214)446-8533

Shelley Seagler, Manager of Training

Direct Line: (214)446-8538

Tyler Curtis, Financial Advisor

Direct Line: (214)446-8541

Joshua Stelzer, Financial Advisor

Direct Line: (972)746-4291

Thomas Doan, Financial Advisor

Direct Line: (214)446-8529

CareyAnn Peterson, Financial Advisor

Direct Line: (214)446-8536

The information about the above named supervised persons, set forth below, supplements the Snider Advisors “Firm Brochure.” You should have received a copy of that brochure. Please contact Jesse Anderson at (214)446-8533 if you did not receive the Snider Advisors “Firm Brochure” or if you have any questions about the contents of this brochure.

“Supervised persons” within Snider Advisors covered by the Brochure Supplement are identified as persons who: (i) formulate investment advice for clients and have direct client contact; or (ii) make discretionary investment decisions for clients’ assets, even if the supervised person has no direct client contact. Hence, this Brochure Supplement provides information for registered representatives of Snider Advisors as well as the firm’s leadership.

In the information about each supervised person provided below:

“Educational background” refers to the supervised person’s post-high school education.

“Business background” refers to the supervised person’s business experience for the last 5 years.

“Disciplinary information” refers to legal or disciplinary events that are material to your evaluation of the supervised person, such as civil lawsuits, proceedings before a government or self-regulatory agency relating to investment activity, or criminal proceedings.

“Other business activities” refers to whether the supervised person is actively engaged in any investment-related business or occupation other than his or her employment by Snider Advisors.

“Additional compensation” refers to whether the supervised person receives an economic benefit for providing investment advice other than his or her regular salary from Snider Advisors.

“Supervisor” refers to the person at Snider Advisors who supervises the supervised person’s investment activities on behalf of the firm. The supervision takes place in various forms: attending client meetings and seminars, listening to the supervised persons’ telephone conversations with clients, regular meetings with the supervised persons and handling client complaints. In addition, there are a number of internal controls related to the supervised persons where reporting is made to the President/CEO and Chief Compliance Officer.

KIMBERLY A. SNIDER

1787 Citation Drive, Aiken, SC 29803

Business Phone: (214)220-0055

Email: ksnider@snideradvisors.com

Web: www.snideradvisors.com

Year of birth: 1963

Educational background: Bachelor of Science – University of Colorado

Business background:

Chronim Investments, Inc – President/ Chief Executive Officer (2008 to Present)

Pecunia Investments, Inc. – President (2004 to 2008), Treasurer (2002 to 2008)

Disciplinary information: None

Other business activities: Kim founded and launched www.poloskilz.com & www.poloskilzcreative.com. It is unrelated to any investment-related business or occupation; however, she devotes a substantial amount of her time to it.

Additional compensation: None

Supervision:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Kimberly A. Snider. He can be reached directly at 214-446-8533. He monitors Kimberly A. Snider's work through remote interactions. He also reviews Kimberly A. Snider's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (f) An investment or an investment-related business activity
- (g) Fraud, false statement(s), or omissions
- (h) Theft, embezzlement, or other wrongful taking of property
- (i) Bribery, forgery, counterfeiting, or extortion
- (j) Dishonest, unfair, or unethical practices

Additional information about Kimberly A. Snider (CRD# 4541620) is available on the SEC's website at www.adviserinfo.sec.gov.

JAMES A. HUGHES

1787 Citation Drive, Aiken, SC 29803

Business Phone: (214)220-0055

Email: jhughes@snideradvisors.com

Web: www.snideradvisors.com

Year of birth: 1962

Educational background: Bachelor of Arts – Drake University; Master of Science – University of Illinois

Business background:

Chronim Investments, Inc – President (2004 to 2007), Chief Compliance Officer (2008-2011), Chief Financial Officer (2005 to Present), Secretary (2005 to Present), Treasurer (2008 to Present)

Pecunia Investments, Inc. –Chief Financial Officer (2005 to 2008), Secretary (2006 to 2008)

Disciplinary information: None

Other business activities: Jim assists with the bookkeeping and data related tasks in the Poloskilz business. It is unrelated to any investment-related business or occupation. It requires an unsubstantial amount of his time.

Additional compensation: None

Supervision:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by James A. Hughes. He can be reached directly at 214-446-8533. He monitors James A. Hughes's work through remote interactions. He also reviews James A. Hughes's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about James A. Hughes (CRD# 4541625) is available on the SEC's website at www.adviserinfo.sec.gov.

JESSE G. ANDERSON, CFA

222 W. Las Colinas Blvd Suite 543E, Irving, TX 75039

Business Phone: (214)446-8533

Email: janderson@snideradvisors.com

Web: www.snideradvisors.com

Year of birth: 1983

Educational background: Bachelor of Science in Business Administration – Robert Morris University

Business background:

Chronim Investments, Inc – Financial Advisor (2005 to 2006), Manager of Trading (2006-2010), Chief Investment Officer/Chief Operations Officer (2010 to Present), Chief Compliance Officer (2011-Present)

Professional Designations:

Chartered Financial Analyst – The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must:

- 1) Pass three sequential, six-hour examinations;
- 2) Have at least four years of qualified professional investment experience;
- 3) Join CFA Institute as members
- 4) Commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Disciplinary information: None

Other business activities: Licensed Insurance Representative (TX License# 1721455) Jesse Anderson spends less than 5% of his time on insurance based solutions.

Additional compensation: None

Supervised by: Kimberly Snider, CEO (214)446-8540, and James Hughes, CFO (214)445-8520, are responsible for all supervision and monitoring of investment advice offered to clients by Jesse G. Anderson. They monitor Jesse's work through remote interactions. They also review Jesse G. Anderson's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Jesse G. Anderson (CRD# 5002910) is available on the SEC's website at www.adviserinfo.sec.gov.

SHELLEY SEAGLER

222 W. Las Colinas Blvd Suite 543E, Irving, TX 75039

Business Phone: (214)220-0055

Email: sseagler@snideradvisors.com

Web: www.snideradvisors.com

Year of birth: 1970

Educational background: Bachelor of Science – Texas Woman's University

Business background:

Chronim Investments, Inc – Manager of Training (2008 to Present)

Pecunia Investments, Inc – Manager of Training (2005 to 2007)

Disciplinary information: None

Other business activities: Licensed Insurance Representative (TX# – 1604592, AZ# – 978472, CA#– OH 05408, CO# – 383768, GA# – 2711419, PA# – 596605, UT# – 343855). Shelley Seagler spends 35% of her time dealing with insurance based solutions.

Additional compensation: None

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Shelley Seagler. He can be reached directly at 214-446-8533. He monitors Shelley Seagler's work through frequent office interactions as well as remote interactions. He also reviews Shelley Seagler's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Shelley Seagler (CRD# 5451277) is available on the SEC's website at www.adviserinfo.sec.gov.

TYLER CURTIS

222 W. Las Colinas Blvd Suite 543E, Irving, TX 75039

Business Phone: (214)220-0055

Email: tcurtis@snideradvisors.com

Web: www.snideradvisors.com

Year of birth: 1985

Educational background: Bachelor of Science – Oklahoma State University

Business background:

Chronim Investments, Inc – Financial Advisor (2007 to Present)

Disciplinary information: None

Other business activities: None

Additional compensation: None

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Tyler Curtis. He can be reached directly at 214-446-8533. He monitors Tyler Curtis's work through frequent office interactions as well as remote interactions. He also reviews Tyler Curtis's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Tyler Curtis (CRD# 5369644) is available on the SEC's website at www.adviserinfo.sec.gov.

JOSHUA STELZER

222 W. Las Colinas Blvd Suite 543E, Irving, TX 75039

Business Phone: (214)220-0055

Email: jstelzer@snideradvisors.com

Web: www.snideradvisors.com

Year of birth: 1983

Educational background: B.B.A. Management and Marketing – University of Mississippi

Business background:

Chronim Investments, Inc – Financial Advisor (2010 to Present)

Horner, Townsend & Kent, Inc. (Ackley Financial Group) – Financial Advisor (2009 to 2010)

Ameriprise Financial – Intern (2008 to 2009)

Disciplinary information: None

Other business activities: Licensed Insurance Representative (TX License # 1542718). Joshua Stelzer spend less than 5% of his time on insurance based solutions.

Additional compensation: None

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Joshua Stelzer. He can be reached directly at 214-446-8533. He monitors Joshua Stelzer's work through frequent office interactions as well as remote interactions. He also reviews Joshua Stelzer's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Joshua Stelzer (CRD# 5607548) is available on the SEC's website at www.adviserinfo.sec.gov.

THOMAS DOAN

222 W. Las Colinas Blvd Suite 543E, Irving, TX 75039

Business Phone: (214)220-0055

Email: tdoan@snideradvisors.com

Web: www.snideradvisors.com

Year of birth: 1989

Educational background: Bachelor of Business Administration – University of Texas - Austin

Business background:

Chronim Investments, Inc – Financial Advisor (2010 to Present)

AXA Advisors – Financial Advisor (2009 to 2010)

Disciplinary information: None

Other business activities: None

Additional compensation: None

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Thomas Doan. He can be reached directly at 214-446-8533. He monitors Thomas Doan's work through frequent office interactions as well as remote interactions. He also reviews Thomas Doan's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Thomas Doan (CRD# 5730147) is available on the SEC's website at www.adviserinfo.sec.gov.

CAREYANN PETERSON

222 W. Las Colinas Blvd Suite 543E, Irving, TX 75039

Business Phone: (214)220-0055

Email: cpeterson@snideradvisors.com

Web: www.snideradvisors.com

Year of birth: 1987

Educational background: Bachelor of Science – Oklahoma State University

Business background:

Chronim Investments, Inc – Financial Advisor (2011 to Present), Marketing Assistant (2010 to 2011);

Securian Advisors MidAmerica – Recruiter (Summer 2010)

IBC Bank – Account Specialist (Summer 2010)

Morgan Stanley Smith Barney – Intern (Summers: 2007, 2008, 2009)

Disciplinary information: None

Other business activities: None

Additional compensation: None

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by CareyAnn Peterson. He can be reached directly at 214-446-8533. He monitors CareyAnn Peterson's work through frequent office interactions as well as remote interactions. He also reviews CareyAnn Peterson's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about CareyAnn Peterson (CRD# 4927681) is available on the SEC's website at www.adviserinfo.sec.gov.