

ST. JOHN & ASSOCIATES, INC.

500 • SUN VALLEY DRIVE, D-4 • ROSWELL, GEORGIA 30076

(770) 642-7631 • ADVISOR@STJOHNFINANCIAL.COM

WWW.STJOHNFINANCIAL.COM

Wrap Fee Program Brochure

This Wrap Free Program Brochure provides information about the qualifications and business practices of St. John & Associates, Inc. (STJI). If you have any questions about the contents of this Brochure, please contact us at (770) 642-7631. 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.

St. John & Associates is a registered investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Additional information about St. John & Associates also is available on the SEC's website at www.adviserinfo.sec.gov.

March 2011

Item 2 Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published "Amendments to Form ADV" which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated March 7, 2011 is a new document prepared according to the SEC's new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will also provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Debbie Blackwell, Director of Client Services at (770) 642-7631 or Advisor@stjohnfinancial.com. Our Brochure is also available on our website www.stjohnfinancial.com, also free of charge.

Additional information about St. John & Associates is also available via the SEC's website www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Advisor who are registered, or are required to be registered as investment Advisor representatives of St. John & Associates.

Item 3 – Table of Contents

Item 1 – Cover Page.....	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Business.....	4
Item 5 – Fees and Compensation.....	5
Item 6 – Performance0Based Fees and Side-By-Side Management.....	6
Item 7 – Types of Clients.....	7
Item 8 – Methods of Analysis, investment Strategies and Risk of loss.....	8
Item 9 – Disciplinary Information.....	9
Item 10 – other Financial industry Activities and Affiliations.....	10
Item 11 – Code of Ethics.....	11
Item 12 – Brokerage Practices.....	12
Item 13 – Review of Accounts.....	13
Item 14 – Client Referrals and Other Compensation.....	14
Item 15 – Custody.....	15
Item 16 – Investment Discretion.....	16
Item 17 – Voting Client Securities.....	17
Item 18 – Financial Information.....	18
Brochure Supplement(s).....	19

Item 4- Advisory Business

St. John & Associates, Inc. was founded in 1989 by Richard J. St. John. There are five employees including one Certified Financial Planner (CFP), three Investment Advisors, a Director of Client Services and one administrative staff. In addition, are five others who are engaged as Independent Contractors in financial planning, investment management, accounting and marketing.

St. John & Associates is a Financial Advisory firm and a Registered Investment Advisor, domiciled in the state of Georgia. The firm provides personal financial planning, portfolio management, and a wide range of financial services to individuals, families, their trusts, estates and owned businesses. These services may include cash management, debt financing, personal lines of insurance, property and casualty insurance, college funding, tax planning, and estate plans, as well as other more client specific services.

Clients engage our firm for either financial services including portfolio management or portfolio management only.

Financial planning regularly includes identification of financial problems, cash flow and budgeting, tax planning, risk exposure review, investment management, educational funding, retirement planning, estate planning, charitable goals, small business planning issues, insurance needs and special needs planning. A written evaluation and report of the client's current financial conditions and their goals is provided to the client. The plan also includes implementation of recommendations and quarterly reports of progress and issues to be completed.

Portfolios are developed for each client based on the client's personal financial plan requirement and/or risk assessment and only after the completion of a written set of investment documents. These documents include an investment statement of investment objectives, time frame, policy constraints, and risk tolerance.

For portfolio management, Advisor provides discretionary management of accounts including taxable, IRA, custodial, 529 college saving plans, employer based 401(k) and other defined contribution and defined benefit plans. St. John & Associates provides development of investment strategies, investment selection, and client reporting.

Richard St. John, President, is the 100% owner of St. John & Associates, Inc.

As of December 31, 2011 St. John & Associates, Inc. managed approximately \$52,000,000 in assets for about 523 accounts and 125 "household" clients, all of which are managed on

a discretionary basis. In addition, some clients maintain non-managed accounts and/or non-invested accounts.

Item 5 - Fees and Compensation

The specific manner in which fees are charged by St. John & Associates is established in the client's written fee agreement with St. John & Associates. Advisor bills its fees on a quarterly basis in arrears. Clients may elect to be billed directly for fees or to authorize Advisor to debit fees from client accounts. Accounts initiated or terminated during a calendar quarter are charged a prorated fee. Upon termination of any account, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

The firm has two primary Wrap Fee Program schedules, one for financial services and portfolio management, and the other for portfolio management only.

For portfolio management of accounts held at Fidelity Investments, Advisor has a wrap fee which includes asset management, trading costs and custodial fees. This fee is 1% of assets under management, invoiced at .25% at the end of each quarter. For portfolio management only, the minimum asset under management and held at Fidelity is \$250,000 and the minimum annual fee is \$5,000.

For portfolio management of accounts held as outside custody accounts like annuities and 401(k) plans, third party fees may be charged. Advisor invoices clients for such accounts at .25% at the end of each quarter. Such fees are either paid directly or debited from their Fidelity accounts.

Accounts held at FTJ FundChoice do not have a minimum asset size or minimum fee. This service tends to be more appropriate for younger clients and those with smaller account sizes.

Fees billed on a household basis may be debited from one or more accounts based on taxes and other considerations.

Clients may incur special charges imposed by custodians and brokers, such as foreign taxes, wire transfer and electronic fund fees and certain short-term trading fees. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such special charges are exclusive of and in addition to the Advisor's fee.

Item 12 further describes the factors that the Advisor considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their commissions, if any.

For financial services and portfolio management, client's annual fees after the first year are based on assets under management on a sliding scale as follows:

Values Of	Rate Of:
Assets up to \$500,000	2.00% (subject to annual minimum)
From \$500,000 up to \$1,000,000	1.75%
From \$1,000,000 up to \$1,500,000	1.50%
From \$1,500,000 up to \$2,000,000	1.25%
From \$2,000,000 up to \$5,000,000	1.00%

Fees for assets in excess of \$5,000,000 are negotiable on an individual basis.

Although this fee is determined on a case by case basis, generally, the minimum asset under management requirement for financial services and portfolio management is \$500,000 with the commensurate annual fee being \$10,000. This service is more appropriate for clients with larger portfolios and a need for other financial services.

For the first year only, due to the front-end work required to develop and build a client's personal financial plan, the client pays an initial advanced fee of \$2,500(contract fee) for financial services plus 0.25% per quarter of assets under management until completion and approval of the client's financial plan. Generally, no portfolio management is provided and no portfolio management fee is charged until initial planning is completed.

This advanced fee and financial service fee is to cover the cost of preparing the initial personal financial plan and to provide for the financial plan implementation and other financial services as needed.

Clients may at any time choose to change from a financial service client to a portfolio management only client or vice versa. Portfolio Management only clients have financial services available to them on an hourly basis.

The Advisor neither receives or accepts any commissions or third party fees and is paid only by the clients as stated above. Some clients have been grandfathered with lower fees or lower minimum requirements.

A Wrap Fee Program may cost the client more or less than purchasing such services separately.

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

St. John & Associates does not contract any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7- Types of Clients

St. John & Associates provides portfolio management services to individuals, high net worth individuals, clients with corporate pensions and profit-sharing plan accounts, custodial accounts, college savings plan accounts and annuities. Company may also provide consulting services to owners of small companies and to other company 401(k) and other defined contribution plans.

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

While St. John & Associates, Inc. believes its strategies and investment selection is designed to potentially produce the highest possible return for a given level of risk, it cannot guarantee that an investment objective or planning goal will be achieved. Some investment decisions made by the firm and the client could potentially result in loss, which may include the original principal invested. The client must be able to bear the various risks involved in the investment accounts, which may include market risk, currency risk, interest rate risk, liquidity risk and operational risk, among others.

Client portfolios are based on an allocation design provided to Advisor by Ibbotson/Morningstar asset allocation models. They range from conservative to aggressive risk character. Each model contains a wide variety of asset classes and subclasses with differing weightings. More conservative models are heavily weighted in fixed income securities and cash, while more aggressive models include a heavier weight in equities.

At its discretion, the firm may aggregate accounts (multiple accounts) for the same individual or family for investing, providing they have substantially the same investment profiles.

Asset allocation and design decisions are made based on clients' Personal Financial Plan requirements and/or Risk Profile, and discussed with the client that in the firm's best judgment, meet the client's objectives while minimizing risk exposure. St. John & Associates, Inc. typically employs conservative fundamental analysis to develop long term investment strategies.

Prior to beginning the investment process for any client, a set of written investment documents is prepared and executed by the client(s) and Advisor. The client's portfolio is then designed and managed within the framework of these documents.

Generally, portfolios are constructed with actively managed mutual funds selected based on Advisors analysis, research of Morningstar data, various other research material and

interviews with mutual fund personnel. Advisor selects mutual funds with differing strategies in each asset class, and available on the custodians trading platforms, to maximize portfolio performance, stability and to minimize the highs and lows of the market.

Client's accounts are managed on a household basis and investments will vary from account to account in light of tax, cash, and other requirements.

As actively managed portfolios, Advisor rebalances each "household" portfolio or account frequently. Each client's portfolio is rebalanced back to its design and target asset allocation periodically. Fidelity portfolios are rebalanced at least monthly. Portfolios at FTJ FundChoice, employer based 401(k) and 403(b) accounts, annuities and some other type of accounts are balanced at least quarterly. Those positions over-weighted are sold and the proceeds reinvested into those securities that are under-weighted.

Periodically, but at least on an annual basis, all mutual funds and other security are researched, ranked and evaluated to determine if they or others will continue in Advisor's model portfolios based on their three year performance and other performance considerations.

Unless otherwise directed by the client, only liquid securities are purchased for client portfolios and they must have the ability to be sold to cash with settlement within one to two days; however, clients may transfer to Fidelity, under Advisor registration, private or non-traded securities.

Item 9- Disciplinary Information

Registered investment advisors are required to disclose to clients and regulators all material facts regarding any legal or disciplinary events that would be material. The firm or its employees have not been involved in any legal or disciplinary events related to past or present investment activities.

Neither St. John & Associates, Inc. nor any of its personnel have been the subject of any legal or disciplinary act or event pursuant to the Investment Advisors Act or similar state statutes.

Item 10 - Other Financial Industry Activities and Affiliations

Other than stated below, neither the firm, nor its associated persons are affiliated with or maintain a material relationship or arrangement with another financial industry entity. The firm's policies require that it and its personnel conduct business activities in a manner that

avoids actual or potential conflicts of interest between the firm, employees and clients, or that may otherwise be contrary to law. The firm will provide disclosure to its clients prior to and throughout the term of their engagements of any conflicts of interest which will or may reasonably compromise its impartiality or independence.

St. John & Associates has contractual arrangements and does recommend custodian broker dealers to clients. Advisor's current primary custodian/broker dealer is Fidelity Investments. In 2008, FTJ FundChoice was added as an alternative custodian/broker dealer. This latter platform applies to smaller size accounts where there is no minimum mutual fund purchase requirement.

Advisor receives no direct compensation from custodian/broker dealers, but Fidelity does provide support services which include trading software, access to client account information, investment research and other business operational platform support. FTJ services are limited to trading and client account information access.

St. John & Associates does engage Certified Financial Planners (CFP) for the preparation of the client's personal financial plans. However, the Advisory firm supervises such work, reviews the planning work, presents it to the clients, and remains accountable to clients for this service.

The Advisor refers clients to other financial professionals for specialized services as needed. This could involve mortgage financing, tax preparation, life insurance, medical, disability, and long term care coverage, property and casualty insurance, estate planning and other more specialized services. St. John & Associates does not receive any form of compensation for any such referrals made to an outside professional; however, on occasion, such financial professionals may refer prospects to us.

As a convenience to clients, one of St. John & Associates' employees is a licensed life insurance agent working under an unrelated insurance broker. In such capacity, she is involved in placing term life insurance only. There is a written disclosure to clients that a commission will be paid to this outside broker. This is not an exclusive source for life insurance placement.

Item 11 - Code of Ethics

St. John & Associates has adopted a Code of Ethics for all persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on

insider trading, a prohibition of rumor mongering, and restrictions on the acceptance of significant gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at the firm must acknowledge the terms of the Code of Ethics annually, or as amended.

Employee accounts may be traded in the same securities and at the same time as client accounts. In such circumstances, the employee and client accounts will receive securities at the same net average cost basis. The firm will retain records of the trade order specifying each participating account.

St. John & Associates' clients or prospective clients are provided with a copy of the firms' Code of Ethics.

Neither St. John & Associates, Inc. nor any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a related person has a material financial interest, such as the capacity as an underwriter, advisor to the issuer, etc. Additionally, employees are prohibited from borrowing from or lending to a client.

In accordance with the firm's ethics policy, St. John & Associates and its related persons may buy or sell securities similar to those purchased for clients accounts, and it may also make recommendations or take action with respect to investments for its clients that may differ in nature or timing from recommendations made to or actions taken for other clients or its employees. At no time, however, will the firm, its employees, or any related party receive preferential treatment over the firm's clients.

All non public, personal information exchanged between the client and the firm will be treated as confidential and will not be disclosed to third parties, except as expressly authorized by the client in writing or as required by law. The firms' current privacy policy will be provided to clients at the inception of the engagement. Thereafter, clients will receive the privacy policy annually or in advance of a policy change.

Item 12 - Brokerage Practices

Fidelity and FTJ FundChoice were chosen as custodians/broker dealers after Advisors due diligence process of the best prepared and capable firms for the delivery of investment services needed by the firm's clients.

Please refer to Item 10 concerning arrangements with custodian/broker dealers.

While there are some soft dollar benefits resulting from an affiliation with Fidelity and FTJ FundChoice, the benefits are both consistent with those provided to other Advisors and provided by other custodians/broker dealers.

Investment Advisor and related persons do have authority to buy and sell any public security in any amount without obtaining specific client consent. However, client's trades are constrained by the client's model target asset allocation, personal financial plan requirements and investment documents that create the framework and structure for all investing.

At the beginning of each client relationship, the client is advised that the investment Advisor intends to use no-load mutual funds or load funds traded at net asset value.

Nearly 100% of client purchases are in mutual funds. In most cases, St. John & Associates buys and sells mutual funds without commissions. In the relatively few cases the firm trades in transaction fee funds, in which there is a financial benefit to the clients in that no annual 12b-1 fees are charged by the fund. As such, the best execution of a brokerage trading fee does not come into play.

Where stocks and bonds are purchased and sold, the commission structure is competitive, far less than full service broker/dealers and in line with other discount brokers. As institutional clients of STJI, investment Advisor may negotiate lower fees and commissions based on the household assets held at each custodian and broker/dealer.

St. John & Associates through FTJ FundChoice does aggregate trades to minimize purchase requirements and mutual funds are traded once a day at 4PM. Trades for all clients done that same day will be executed at the same net asset value.

Item 13 - Review of Accounts

All clients go through a process with the Advisory firm in determining the appropriate investment strategy and model portfolio target asset allocation. This process includes the client completing and scoring a risk profile questionnaire, in some cases completing a personal financial plan and executing a set of written investment documents including an investment policy, portfolio model asset allocation and an investment strategy. One of five model portfolio asset allocations is selected by each client based on the targeted annual rate of return required to support their personal financial plan or the client's risk tolerance, age, timeline, objectives, and need for liquidity.

Each of the five model portfolios ranging from conservative to aggressive have increasing risk characteristics, targeted annual rates of return and equities, fixed income securities and cash weightings. The allocations made within the model portfolios are based on research from Ibbotson/Morningstar and built in the optimization of Money Guide Pro financial planning software used by STJI for personal financial planning.

Once completed and approved by the client, the client's portfolio design cannot be changed without the client's written approval in investment documents. Changes could occur and be approved by the client as a result of changes in their personal or financial condition or as a result of the personal financial plan annual update or change in risk assessment.

Client's portfolios are managed on a household basis except custodial, Coverdale, annuities, FTJ and employer based plan accounts not held at Fidelity. New client's portfolios are generally invested on a dollar cost averaging basis in line with their model portfolio asset allocation. Since such investing is done gradually, each new client's portfolio is reviewed at the end of each quarter. Once substantially invested, it is added to the firm's master portfolio review schedule and rebalanced regularly. The frequency of review and rebalance can be affected by additions and withdrawals from the portfolio and market volatility. Changes could also occur resulting from changes in management, investment style and/or unacceptable relative performance by mutual funds.

Greg St. John, Executive Vice President & Portfolio Manager manages all client portfolios. Richard St. John, President oversees these activities and handles this responsibility directly in his absence. Debbie Blackwell works with clients concerning their deposits or withdrawals.

Beginning in 2008, smaller accounts have been held in custody by an alternate platform, FTJ FundChoice. These clients' engagements do not usually include financial planning or financial services, but otherwise follow the same procedure listed above and accounts are

managed individually and rebalanced through a custodian and broker/dealer as directed by advisor. These accounts are managed on the basis of the investment strategy and portfolio model asset allocation of STJI, while some others are invested under the Litman Gregory models.

Clients whose accounts are held at Fidelity receive copies of all trade confirmations electronically or hardcopy quarterly, and a monthly statement for every account directly from Fidelity. Clients at FTJ FundChoice receive Trade Confirmations and statements on a quarterly basis either by mail or electronically. The monthly or quarterly statements report all activities having taken place in each account, in addition to the holdings and market value of each account.

On a calendar quarterly basis, each client at Fidelity receives a set of portfolio reports that include a General Commentary, Individual Commentary, Portfolio Review Report (summary), Portfolio Rebalance Report and Portfolio Holding Report from SJA.

The Advisor reports are reconciled to the broker/dealer statement for the end of each quarter. The Reports are also reviewed by the portfolio manager and firm principal to verify that the portfolio was invested in line with the portfolio target asset allocation. The reports are prepared and reported in accordance with Global Investment Performance Standards (GIPS). These reports include a listing of investments by asset class and the summary of changes for the quarter. The Portfolio Review Report compare the portfolio's time weighted rate of return for the quarter, year to date, 3, 5, 7, 10 years and from inception to that of the client absolute target rate of return, inflation rate and portfolio blended index rates of return.

For portfolios held at FTJ FundChoice, the broker/dealer trade confirmations and account statements are provided to the client on a quarterly basis by web-site access through the internet at ftjfundchoice.com by registering for a password. For invoiced clients at FTJ FundChoice, advisor does provide quarterly general and individual portfolio commentaries.

Item 14- *Client Referrals and Other Compensation*

Prospects are referred to us from clients, professionals with whom we network and from various websites including the National Association of Personal Financial Advisors (NAPFA) and our own website, www.stjohnfinancial.com. No compensation is paid to any such sources for referrals.

Investment Advisor does retain solicitor's (agents) under agreements in compliance with the Investment Advisors Act of 1940. All clients procured from a solicitor are advised in writing through full disclosure of the compensation and terms of such arrangements and

sign the required acknowledgement form. In no event is the client charged an Advisory fee in excess of its fee schedule of any other client or more than it would have been charged had no solicitor's fee been paid.

Item 15- Custody

Clients should receive statements monthly or quarterly from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. St. John & Associates urges clients to carefully review such statements and compare such official custodial records to the reports that advisor provides to you. St. John & Associates portfolio reports may vary from custodial statements based on trade dates, reporting dates, or valuation methodologies of certain securities.

According to a recent ruling by the SEC, investment advisors are deemed to have "custody" of client funds if certain conditions are met. From time to time, St. John & Associates may be technically considered to have "custody" of certain types of accounts, such as when a staff member acts as a trustee of an unrelated trust. In this case, the SEC may require an annual surprise audit of those "custodian" accounts by an independent CPA firm. St. John & Associates, Inc. complies with this requirement.

Item 16- Investment Discretion

To manage the client's accounts, making up their managed portfolio, St. John & Associates receives discretionary authority from the client at the outset of an Advisory relationship. In all cases, however, such discretion is to be exercised in a manner consistent with the written investment policies for the particular client's accounts, or portfolio.

Investment guidelines and restrictions are provided to advisor in writing as part of the client's investment policy.

When selecting securities and determining amounts, St. John & Associates acknowledges the investment policies limitations and restrictions of the clients for which it advises.

St. John & Associates accepts discretionary authority to manage accounts on behalf of clients. Advisor has the authority to determine the amount and type of securities to be bought or sold without obtaining specific client consent.

Discretionary authority facilitates placing trades in clients' accounts in the implementation of the client's investment policy. Copies of all trades are sent from the custodian.

Clients must sign a limited power of attorney on the custodians' applications before St. John & Associates is given discretionary trading authority.

Item 17 - Voting Client Securities

As a matter of firm policy and practice, Advisor does have authority to and does vote proxies on behalf of Advisory clients. Advisor retains the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

Clients may obtain a copy of St. John & Associates' complete proxy voting policies and procedures upon request. Clients may also obtain information from Advisor about how St. John & Associates voted any proxies on behalf of their account(s).

Item 18- Financial Information

Registered Investment Advisors are required in this item to provide clients with certain financial information or disclosures about St. John & Associates financial condition. Advisor does not have any financial impairment that will preclude the firm from meeting contractual or fiduciary commitments to clients. A balance sheet is not required to be provided because St. John & Associates does not serve as a custodian for client funds or securities and does not require prepayment of investment fees.

Advisor has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office access, communications, services or key people.

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, fire, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived on and offsite.

Alternate work locations are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of the disaster that dictates our moving our office to an alternate location.

Brochure Supplement

Supervised Persons

Richard St. John, Gregory St. John, and Bryan Totri

St. John & Associates, Inc.
500 Sun Valley Drive, D-4
Roswell, GA 30076
(770) 642-7631

This brochure supplement provides information about Richard St. John, Gregory St. John, and Bryan Totri that supplements the St. John & Associates brochure. You should have received a copy of that brochure. Please contact Debbie Blackwell, Director of Client Services, if you did not receive St. John & Associates, Inc.'s brochure or if you have any questions about the contents of this brochure with supplement.

Additional information about Richard St. John, Gregory St. John, and Bryan Totri is available on the SEC's website at www.adviserinfo.sec.gov.

As of March 2012

Education and Business Standards

There are standards of education and business or financial experience that are required of those involved in determining and giving investment advice to clients. Such employees are required to have:

1. A college degree specialized in business, finance, economics, investments, decision science and related specialties.
2. Five years or more of related experience in business, consulting or research.
3. Portfolio Manager must have a minimum of five years of hands on experience.
4. Financial Planner is required to be a Certified Financial Planner (CFP) holding both the designation and having three years of hands on experience.

Supervised Persons - Education and Business Background

Richard St. John - Born 1936

Education

- University of Wisconsin, Madison, Wisconsin
1955-1956
- North Central College, Naperville, Illinois
B.A., Business Administration & Psychology
June 1959
- Farleigh Dickinson University, Rutherford, NJ
Master of Business Administration (MBA)
Sept. 1977
- National Association of Securities Dealers, securities license for Registered Representatives, December 1988
- National Association of Securities Dealers, securities license for Registered Principal, March 1989
- Uniformed Investment Advisor Law Exam Series 65, April 1995
- Certified as a Chartered Mutual Fund Counselor (CMFC) by National Endowment for Financial Education, October 1996

Business Background

Prior to St. John & Associates, Inc., Richard St. John was:

- President, Co-Owner and Principle of Pension Securities, a registered broker dealer firm

- President of The Management Group, a venture capital firm.
- Prior to this, he was the Vice President of two Fortune 500 companies.
- St. John & Associates, Inc., Registered Investment Advisory Firm 1992 to Present, Founder, President, and CEO

Disciplinary Information

- None

Professional Activities

- Board of Directors, Sandy Springs Senior Center
- The Gold Shield Foundation of Metro Atlanta

Gregory St. John - Born 1967

Education

- Georgia Institute of Technology
1986-1987
- DeKalb College
1988-1990
- Georgia State University
1991-1996
Bachelor of Business Administration
Major Field of Study, Decision Science

Business Background Preceding Five Years

- Watson Wyatt Company, International Consulting Firm
1989-1993 Intern, Actuarial Assistant
- Watson Wyatt Investment Consultant, National Financial Consulting
1993-1999 Research Analyst, Manager of Performance Processing Center
- St. John & Associates, Inc., Registered Investment Advisory Firm
1999-2001 Investment Analyst
2001 Promoted to Portfolio Manager
2004 Promoted to Vice President and Portfolio Manager
2011 Promoted to Executive Vice President. In this capacity, he is responsible for oversight of staff in delivery on financial and client services. He is directly responsible for portfolio management.

Professional Activities

- CADEF (The Childhood Autism Foundation) - Board of Directors and Treasurer

- Boy Scouts of America - Assistant Troop Leader
- Boy Scouts of America – Venture Advisor
- Northview High School – Assistant Wrestling Coach

Supervision

- Greg is supervised by Richard St. John, President, through weekly staff meetings and frequent office interaction

Bryan M. Totri - Born 1955

Education

- Greater Hartford Community College
1975-1977
Computer Science, Business Administration
- City College of San Francisco
1980-1982
Degree in Business Administration
- University of San Francisco
1984 - 1985 Economics
- Denver College of Financial Planning
1991-1993
Certified Financial Planner (CFP)
- National Association of Securities Dealers, securities license for
Registered Representatives
December 1989
- Filed NASD for inactive status in 1995

Business Background Preceding Five Years

- WellSpring Planning, LLC. Registered Investment Advisory
Firm 2000-2007, Founder and President
- St. John & Associates, Inc., Registered Investment Advisory
Firm 2007-2010, Director, Personal Financial Planning
2010 -Vice President of Financial Planning and Services. In this capacity, he is responsible for managing client personal financial planning and the delivery of financial services.

Disciplinary Information

- None

Professional Activities

- The National Association of Personal Financial Advisors (NAPFA)
- The Financial Planning Association (FPA)

Supervision

- Bryan is supervised by Greg St. John, Executive Vice President and Richard St. John, President, through weekly staff meetings and frequent office interaction