

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

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Name of Investment Adviser:

**Lynn Finkelstein & Co., Inc.**

Address: (Number and Street)

**269 SE 5<sup>th</sup> Avenue**

(City)

**Delray Beach**

(State)

**FL**

(Zip Code)

**33483**

Area Code: Telephone Number:

**( 561 ) 243-1230**

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.**

**FORM ADV****Part II - Page 2**

Applicant:

**Lynn Finkelstein & Co., Inc.**

SEC File Number:

801-N/A

Date:

**07/23/2007****1. A. Advisory Services and Fees.** (check the applicable boxes)For each type of service provided, state the approximate % of total advisory billings from that service.  
(See instruction below.)**Applicant:**

- |                                     |     |   |              |
|-------------------------------------|-----|---|--------------|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services .....  | <u>100</u> % |
| <input type="checkbox"/>            | (2) | Manages investment advisory accounts not involving investment supervisory services .....  | ___%         |
| <input type="checkbox"/>            | (3) | Furnishes investment advice through consultations not included in either service described above .....  | ___%         |
| <input type="checkbox"/>            | (4) | Issues periodicals about securities by subscription .....   | ___%         |
| <input type="checkbox"/>            | (5) | Issues special reports about securities not included in any service described above .....   | ___%         |
| <input type="checkbox"/>            | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities ..... | ___%         |
| <input type="checkbox"/>            | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities .....   | ___%         |
| <input type="checkbox"/>            | (8) | Provides a timing service .....   | ___%         |
| <input type="checkbox"/>            | (9) | Furnishes advice about securities in any manner not described above .....   | ___%         |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

**B.** Does applicant call any of the services it checked above financial planning or some similar term? .....Yes No  
☐ ☒**C.** Applicant offers investment advisory services for: (check all that apply)

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management      | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges  | <input type="checkbox"/> (5) Commissions       |
| <input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other             |

**D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

**2. Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> A. Individuals           | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations         |
| <input type="checkbox"/> B. Banks or thrift institutions     | <input type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies             | <input type="checkbox"/> G. Other (describe on Schedule F)                                  |
| <input type="checkbox"/> D. Pension and profit sharing plans |   |

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

**FORM ADV****Part II - Page 3**

Applicant:

**Lynn Finkelstein & Co., Inc.**

SEC File Number:

801- **N/A**

Date:

**07/23/2007****3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities                               | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                     |  |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter             | I. Options contracts on:   |
| <input checked="" type="checkbox"/> (3) foreign issues                                 | <input checked="" type="checkbox"/> (1) securities                         |
|  | <input type="checkbox"/> (2) commodities                                   |
| <input type="checkbox"/> B. Warrants   | J. Futures contracts on:   |
| <input type="checkbox"/> C. Corporate debt securities<br>(other than commercial paper) | <input type="checkbox"/> (1) tangibles                                     |
| <input type="checkbox"/> D. Commercial paper   | <input checked="" type="checkbox"/> (2) intangibles                        |
| <input checked="" type="checkbox"/> E. Certificates of deposit                         | K. Interests in partnerships investing in:                                 |
| <input checked="" type="checkbox"/> F. Municipal securities                            | <input type="checkbox"/> (1) real estate                                   |
| G. Investment company securities:  | <input type="checkbox"/> (2) oil and gas interests                         |
| <input type="checkbox"/> (1) variable life insurance                                   | <input type="checkbox"/> (3) other (explain on Schedule F)                 |
| <input type="checkbox"/> (2) variable annuities  | <input checked="" type="checkbox"/> L. Other (explain on Schedule F)       |
| <input type="checkbox"/> (3) mutual fund shares  |  |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

## A. Applicant's security analysis methods include: (check those that apply)

- |   |  |
|---|--|
| (1) <input type="checkbox"/> Charting               | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |  |

## B. The main sources of information applicant uses include: (check those that apply)

- |   |  |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services   |
| (2) <input type="checkbox"/> Inspections of corporate activities              | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the<br>Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases   |
| (4) <input type="checkbox"/> Corporate rating services                        | (8) <input type="checkbox"/> Other (explain on Schedule F)   |

## C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |   |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered<br>options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days)                 | (7) <input type="checkbox"/> Other (explain on Schedule F)  |
| (4) <input checked="" type="checkbox"/> Short sales  |   |

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

**FORM ADV****Part II - Page 4**

Applicant:

**Lynn Finkelstein & Co., Inc.**

SEC File Number:

801-N/A

Date:

**07/23/2007****5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? . . . . .

Yes No  
☒ ☐

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- |                 |  |
|-----------------|--|
| • name          | • formal education after high school               |
| • year of birth | • business background for the preceding five years |

**7. Other Business Activities.** (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |  |
|--|--|
| <input type="checkbox"/> (1) broker-dealer   | <input checked="" type="checkbox"/> (7) accounting firm                            |
| <input type="checkbox"/> (2) investment company  | <input type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser  | <input type="checkbox"/> (9) insurance company or agency                           |
| <input type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.....

Yes No  
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

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

**FORM ADV**
**Part II - Page 5**

Applicant:

**Lynn Finkelstein & Co., Inc.**

SEC File Number:

801- **N/A**

Date:

**07/23/2007**
**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? . . . . .

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

**Please refer to Schedule F, Item 11. A.**

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

**Please refer to Schedule F, Item 11. B.**
**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

Applicant:

Lynn Finkelstein &amp; Co., Inc.

SEC File Number:

801-N/A

Date:

07/23/2007

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold? . . . . .

Yes No

☒ ☐

(2) amount of the securities to be bought or sold ? . . . . .

Yes No

☒ ☐

(3) broker or dealer to be used ? . . . . .

Yes No

☒ ☐

(4) commission rates paid? . . . . .

Yes No

☒ ☐

B. Does applicant or a related person suggest brokers to clients? . . . . .

Yes No

☒ ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? . . . . .

Yes No

☒ ☐

B. directly or indirectly compensates any person for client referrals? . . . . .

Yes No

☐ ☒

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities unless applicant is registered or registering only with the Securities and Exchange Commission; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? . . . . .

Yes No

☐ ☒

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Lynn Finkelstein & Co., Inc.	801- N/A	07/23/2007

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Lynn Finkelstein &amp; Co., Inc.</b>	IRS Empl. Ident. No.: <b>37-1452693</b>
--	--

Item of Form (identify)	Answer
Item 1.D.	<p><b>ADVISORY SERVICE AND FEES</b></p> <p>Lynn Finkelstein &amp; Co., Inc. ("Lynn Finkelstein &amp; Co." or the "Firm") provides discretionary Investment Advisory services for individuals, trusts, estates and charitable organizations on a fee only basis. Subject to any written guidelines, which the client may provide, the Firm will be granted discretion and authority to manage the account. Accordingly, Lynn Finkelstein &amp; Co. is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include making all investment decisions on the (a) securities purchased/sold; (b) the amount of securities to be purchased/sold; (c) selection of the broker or dealer to execute the transaction(s), and (d) the commission rates to be paid. Once the portfolio is constructed, Lynn Finkelstein &amp; Co. provides ongoing supervision and re-balancing of the portfolio as changes in market conditions and client circumstances may require. All client accounts are individually managed and are constructed to fit the risk/ reward and tax/tax free profile of each client.</p> <p>In limited circumstances, the Firm may provide non discretionary portfolio management services, where the Firm will seek client approval prior to placing orders for any transaction.</p> <p>Lynn Finkelstein &amp; Co. views each equity for inclusion in client accounts that have growing sales and earnings, market niches and strong management. Each holding is assigned a target price to BUY/SELL to control risk in client accounts.</p> <p>Fixed income selections are based on the firm's view of future interest rates. Purchases are made on the basis of issuer quality and tax status of individual client portfolios. While fixed income securities are acquired on a Buy and Hold basis, Quality and Redemption provisions are monitored constantly to maximize opportunities for client portfolios.</p> <p><b>INVESTMENT ADVISORY FEES</b></p> <p>Fees are billed quarterly in advance based on the account balance on the first day of the quarter. Fees will be assessed pro rata in the event the portfolio management agreement is executed at any time other than the first day of a calendar quarter. On an annualized basis, Lynn Finkelstein &amp; Co. charges a management fee of 1.75% of assets under management or a minimum of \$750.00 per account per quarter, whichever is greater.</p> <p>Payment of fees will be made by a direct debit by the custodian holding the client's funds and securities provided that the following requirements are met:</p> <ul style="list-style-type: none"><li>▪ The client provides written authorization permitting the fees to be paid directly from the client's account held by the custodian. Lynn Finkelstein &amp; Co. does not have access to client funds for payment of fees without client consent in writing.</li><li>▪ Lynn Finkelstein &amp; Co. sends the client an invoice showing the amount of the fee, the value of the client's assets on which the fee is based, and the specific manner in which the fee was calculated.</li><li>▪ It is disclosed to the client that it is the client's responsibility to verify the accuracy of the fee calculation and that the custodian will not determine whether the fee is properly calculated.</li><li>▪ Lynn Finkelstein &amp; Co. will send an invoice to the custodian indicating only the amount of the fee to be paid by the custodian.</li></ul>

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Lynn Finkelstein & Co., Inc.	801- N/A	07/23/2007

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Lynn Finkelstein &amp; Co., Inc.</b>		IRS Empl. Ident. No.: <b>37-1452693</b>
Item of Form (identify)	Answer	
Item 1.D. (continued)	<ul style="list-style-type: none"> <li>The custodian agrees to send the client a statement, at least quarterly, indicating all amounts dispersed from the account including the amount of the advisory fee paid directly to Lynn Finkelstein &amp; Co.</li> </ul>	
Item 3.L.	<p><b>TERMINATION</b></p> <p>The client may terminate the portfolio management agreement within five days of the date of execution without penalty to the client. After the five-day period, either party may terminate the agreement by providing a written notice to the other party.</p> <p><b>TYPES OF INVESTMENTS</b></p> <p>Lynn Finkelstein &amp; Co. reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. Lynn Finkelstein &amp; Co. may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship.</p>	
Item 5.	<p><b>EDUCATION AND BUSINESS STANDARDS</b></p> <p>At a minimum, investment adviser representatives ("IARs") of Lynn Finkelstein &amp; Co. must meet all examination or experience requirements of the state(s) and/or jurisdiction(s) in which the individual provides advisory services.</p>	
Item 6.	<p><b>EDUCATION AND BUSINESS BACKGROUND</b></p> <p>LYNN FINKELSTEIN, MBA, CPA, CFP®  Born: 01/12/45  <b>EDUCATION</b>  Pace University – MBA – Taxation 1980  St. Thomas Aquinas College – BS – 1977 (Business Administration)  Brooklyn College – AAS – 1966 (Business Administration)  <b>BUSINESS BACKGROUND FOR PREVIOUS 5 YEARS</b>  Lynn Finkelstein &amp; Co., Inc. – President/Chief Compliance Officer – 01/2003 to Present.</p> <p>Additionally, Lynn Finkelstein is the sole proprietor of Lynn Finkelstein, CPA, a separate entity which has been engaged in tax preparation and tax related matters for the past 25 years.</p> <p>SARA FINKELSTEIN,  Born: 12/15/60  <b>EDUCATION</b>  St. John's University, NY – BS – 1987 (Business Management)  <b>BUSINESS BACKGROUND FOR PREVIOUS 5 YEARS</b>  Lynn Finkelstein &amp; Co., Inc. – Investment Adviser Representative – 02/2000 to Present.</p>	
Item 13. A.	<p>Additionally, Sara Finkelstein is a licensed insurance agent for life, health, disability, long-term care, and annuities among others. As such, Ms. Finkelstein can effect transactions in insurance products for clients and earn commissions for these activities.</p>	

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



**Schedule F of  
Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Lynn Finkelstein & Co., Inc.	801- N/A	07/23/2007

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Lynn Finkelstein &amp; Co., Inc.</b>	IRS Empl. Ident. No.: <b>37-1452693</b>
Item of Form (identify)	Answer
Item 8.C.(7).	<b>OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS</b>  Lynn Finkelstein, President/CCO of Lynn Finkelstein & Co. is the sole proprietor of Lynn Finkelstein, CPA, a separate entity which has been engaged in tax preparation and tax related matters for the past 25 years. The Firm expects that clients to whom it offers advisory services may also be clients of Lynn Finkelstein, CPA. Clients are advised that the fees paid to the Firm for advisory services are separate and distinct from fees earned by Lynn Finkelstein, CPA, for tax preparation and consulting services. Clients to whom the Firm offers advisory services are informed that they are under no obligation to utilize Lynn Finkelstein, CPA for tax preparation and consulting services.
Item 9.E.	<b>PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS</b>  Lynn Finkelstein & Co. or individuals associated with the Firm may buy or sell – for their personal account(s) - investment products identical to those recommended to clients. It is the expressed policy of Lynn Finkelstein & Co. that employees shall not have priority in any purchase or sale over clients' accounts. <sup>(1)(2)</sup>  Lynn Finkelstein & Co. has adopted a Code of Ethics, the full text of which is available to clients and prospective clients upon request. Lynn Finkelstein & Co. has several goals in adopting this Code. First, the Firm desires to comply with all applicable laws and regulations governing its practice, and the management of Lynn Finkelstein & Co. has determined to set forth guidelines for professional standards, under which all associated persons of the Firm are to conduct themselves. The Firm has set high standards, the intention of which is to protect client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith and fair dealing with clients. All associated persons are expected to adhere strictly to these guidelines, as well as any procedures for approval and reporting established in the Code of Ethics primarily related to violations of the Code. In addition, Lynn Finkelstein & Co. maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Lynn Finkelstein & Co. or any person associated with the Firm.  Footnotes:  <sup>(1)</sup> This policy has been established recognizing that some securities being considered for purchase and/or sale on behalf of Lynn Finkelstein & Co.'s clients trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with Lynn Finkelstein & Co.'s records in the manner set forth above.  <sup>(2)</sup> The foregoing does not apply to certain types of securities, such as obligations of the U.S. Government, and shares in open-end mutual funds. Open-end mutual funds are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds by Advisory Representatives are not likely to have an impact on the prices of the fund shares in which clients invest.
Item 10.	<b>CONDITIONS FOR MANAGING ACCOUNTS</b>  All new accounts are required to have a minimum value of \$500,000.00 All exceptions must be approved by Lynn Finkelstein.

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Lynn Finkelstein & Co., Inc.	801- N/A	07/23/2007

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Lynn Finkelstein &amp; Co., Inc.</b>		IRS Empl. Ident. No.: <b>37-1452693</b>
Item of Form (identify)	Answer	
Item 11.A. & B.	<p><b>REVIEW OF ACCOUNTS/REPORTS TO CLIENTS</b></p> <p>Reviews are conducted by the IAR responsible for the client account. All client accounts are reviewed on three levels:</p> <ol style="list-style-type: none"> <li>1. Individual accounts are formally reviewed at least quarterly to verify and update client goals and tax considerations.</li> <li>2. Individual security reviews are performed on a continuous basis.</li> <li>3. The results from #2 provide the basis for further account review as accounts are repositioned with BUYS and SELLS.</li> </ol> <p>Clients receive statements, on a monthly basis, directly from the account custodian</p>	
Item 12. A. (1), (2), (3), (4)	<p><b>INVESTMENT OR BROKERAGE DISCRETION</b></p> <p>Generally, clients grant Lynn Finkelstein &amp; Co. complete discretion over the selection and amount of securities to be purchased or sold, the broker/dealer to be used and the commission rates to be paid for their account without obtaining their prior consent or approval. However, Lynn Finkelstein &amp; Co.'s investment authority may be subject to specified investment objectives, guidelines and/or conditions imposed by the client. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio.</p>	
Item 12. B.	<p><b>SUGGESTION OF BROKER/ADDITIONAL COMPENSATION</b></p> <p>Lynn Finkelstein &amp; Co. recommends that Clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab &amp; Co., Inc. ("Schwab Institutional"), a registered broker-dealer, member SIPC/NYSE, to maintain custody of the Client's assets and to effect trades for their accounts. Clients are advised that there may be transaction charges involved when purchasing or selling securities. Lynn Finkelstein &amp; Co. does not share in any portion of the brokerage fees/transaction charges imposed by Schwab Institutional. Additionally, the commission/transaction fees charged by Schwab Institutional may be higher or lower than those charged by other broker-dealer/custodians.</p> <p>Schwab Institutional provides Lynn Finkelstein &amp; Co. with access to its institutional trading and operations services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers at no charge to them so long as a total of at least \$10 million of the adviser's Clients account assets are maintained at Schwab Institutional. Schwab Institutional services may include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require significantly higher minimum initial investments. Schwab Institutional also makes available to Lynn Finkelstein &amp; Co. other products and services that benefit Lynn Finkelstein &amp; Co. but may not benefit its Clients' accounts. These include software and other technology that provide access to Client account data (such account statements), facilitate trade execution, provide research, pricing information and other market data, facilitate payment of Lynn Finkelstein &amp; Co.'s fees from its Clients' accounts, and assist with back-office support, recordkeeping and Client reporting. The availability to Lynn Finkelstein &amp; Co. of the foregoing products and services is not contingent upon Lynn Finkelstein &amp; Co. committing to Schwab Institutional any specific amount of business (assets in custody or trading).</p> <p>Lynn Finkelstein &amp; Co. believes that Schwab Institutional provides the best services at the</p>	

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Lynn Finkelstein & Co., Inc.	801- N/A	07/23/2007

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Lynn Finkelstein &amp; Co., Inc.</b>	IRS Empl. Ident. No.: <b>37-1452693</b>
Item of Form (identify)	Answer	
	<p>lowest commission rates possible. The reasonableness of commissions is based on several factors, including the broker's ability to provide professional services, competitive commission rates, volume discounts, execution price negotiations, the broker's reputation, experience and financial stability of the broker or dealer, and the quality of service rendered by the broker or dealer in other transactions.</p> <p>Best execution is not measured solely by reference to commission rates. Paying a broker a higher commission rate than another broker might charge is permissible if the difference in cost is reasonably justified by the quality of the brokerage services offered.</p> <p><b>MISCELLANEOUS</b></p> <p><i>Proxy Voting</i> The Firm will not vote proxies on behalf of advisory Clients' accounts. Although, on rare occasions and only at the Client's request, the Firm may offer Clients advice regarding corporate actions and the exercise of proxy voting rights.</p> <p><i>Class Action Lawsuits</i> From time to time, securities held in the accounts of Clients will be the subject of class action lawsuits. The Firm has no obligation to determine if securities held by the Client are subject to a pending or resolved class action lawsuit. It also has no duty to evaluate a Client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, the Firm has no obligation or responsibility to initiate litigation to recover damages on behalf of Clients who may have been injured as a result of actions, misconduct or negligence by corporate management of issuers whose securities are held by Clients.</p> <p>Where the Firm receives written or electronic notice of a class action lawsuit, settlement or verdict affecting securities owned by a Client, it will forward all notices, proof of claim forms and other materials, to the Client. Electronic mail is acceptable where appropriate, and the Client has authorized contact in this manner.</p>	

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