

Uniform Application for Investment Adviser Registration

OMB APPROVAL

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Name of Investment Adviser:

Genesis Investment Advisory Services LLC

Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code	Telephone number
110 East 42nd Street, Suite 1302	New York	NY	10017		(212) 687-3600

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.)

Definitions for Part II

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

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 instructions below.)

Applicant:

<input checked="" type="checkbox"/>	(1)	Provides investment supervisory services	80 %
<input checked="" type="checkbox"/>	(2)	Manages investment advisory accounts not involving investment supervisory services	10 %
<input checked="" type="checkbox"/>	(3)	Furnishes investment advice through consultations not included in either service described above	5 %
<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 checked="" type="checkbox"/>	(7)	On more than an occasional basis, furnishes advice to clients on matters not involving securities	5 %
<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 checked="" type="checkbox"/>	(2)	Hourly charges	<input type="checkbox"/>	(5)	Commissions
<input type="checkbox"/>	(3)	Fixed Fees (not including subscription fees)	<input checked="" 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 checked="" type="checkbox"/>	D.	Pension and profit sharing plans			

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

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

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

4. Methods of Analysis, Sources of Information, and Investment Strategies.**A.** Applicant's security analysis methods include: (check those that apply)

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

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

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

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

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

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

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 checked="" type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading advisor 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 in 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).

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 of 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
☐ ☒

(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

Managed accounts are reviewed at least quarterly. Financial planning accounts are reviewed annually. The calendar triggers reviews. Accounts under the AssetMark programs and those at other money managers are reviewed when the investment advisor receives a statement, usually quarterly. Other events in the market, or political events affecting the market, as well as changes in a client's goals or situation, can also trigger reviews on an ad hoc basis.

Each investment adviser representative is responsible for her or his own client account reviews. The reviews are conducted on a portfolio analysis basis.

Currently Mr. Addeo, the firm's managing member, is the sole reviewer of all accounts (100 accounts in September 2006).

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

Clients receive regular reports from their broker dealer(s), custodians, mutual funds, the AssetMark program and other money managers, as appropriate. Managed account clients receive quarterly performance reports and position reports processed from the program data and sent by Genesis Investment Advisory Services LLC to its clients.

Each month clients of the AssetMark program receive an account report from the custodian of the account(s).

12. Investment or Brokerage Discretion.

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

- | | | |
|--|--------------------------|-------------------------------------|
| | Yes | No |
| (1) securities to be bought or sold? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Yes | No |
| (2) amount of the securities to be bought or sold? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Yes | No |
| (3) broker or dealer to be used? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Yes | No |
| (4) commission rates paid? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

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

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

- has custody of client funds or securities; (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
	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Item of Form	Answer												
1. A. Advisory Services and Fees. (1)	<p>Investment Advisory Services: investments are held by Fiserv Trust Company and managed through Assetmark Investment Services' different Portfolio Strategists. The firm determines which strategy is suited for each client and oversees their performance relative to the client's investment objective.</p> <p>Fee Schedule</p> <table> <tr> <td>Level of Assets</td><td>Annual Fee</td></tr> <tr> <td>First \$250,000</td><td>1.00%</td></tr> <tr> <td>Next \$250,000</td><td>0.90%</td></tr> <tr> <td>Next \$500,000</td><td>0.75%</td></tr> <tr> <td>Next \$1mm</td><td>0.60%</td></tr> <tr> <td>Over \$2mm</td><td>0.50%</td></tr> </table> <p>Fees are calculated based on the average daily value of the account's assets under management during the immediately preceding calendar quarter.</p> <p>When compensation is payable. Fees will be paid quarterly in advance for each succeeding calendar quarter on the first day of the quarter.</p>	Level of Assets	Annual Fee	First \$250,000	1.00%	Next \$250,000	0.90%	Next \$500,000	0.75%	Next \$1mm	0.60%	Over \$2mm	0.50%
Level of Assets	Annual Fee												
First \$250,000	1.00%												
Next \$250,000	0.90%												
Next \$500,000	0.75%												
Next \$1mm	0.60%												
Over \$2mm	0.50%												
1. A. (2)	<p>The firm manages investment advisory accounts through another platform of the Fiserv Trust Company, where it is able to trade Mutual Funds on behalf of the client.</p> <p>Fees.</p> <p>When compensation is payable.</p>												
6. Education and Business Background	<p>Name: Gerard Addeo</p> <p>Year of birth: 1957</p> <p>Formal education after high school:</p> <p>Business background for the preceding five years:</p>												
7. Other Business Activities. C.	<p>The principal executive officer of the applicant firm provides Accounting, Cash Management, Tax and Payroll services through another firm.</p> <p>Time spent on these activities: _____</p>												
9. Participation or Interest in Client Transactions	<p>A Fiduciary's Code of Ethics : Proprietary Trading and Insider Information</p> <p><u>Genesis Investment Advisory Services LLC</u></p> <p><i>The prohibition against advisers defrauding clients is the single most important provision and the whole thrust of the Investment Advisers Act of 1940. The Supreme Court has construed this provision to impose on advisers a fiduciary obligation to their clients, a duty that requires advisers to manage their client's portfolios in the best interest of clients, although not in any prescribed manner. Obligations to clients flow from this fiduciary duty, including the duty</i></p> <ul style="list-style-type: none"> ▪ To disclose fully any conflicts the adviser has with clients, ▪ to seek best execution for client market transactions, and ▪ to have a reasonable basis for all recommendations made to clients. 												

I. Duties to the CLIENT : a FIDUCIARY RELATIONSHIP

The keystone to building any and all investment advisory services is a clear knowledge and sincere acceptance of each investment adviser's fiduciary duty to her or his advisory client. "A **fiduciary** is a person in a confidential relationship who owes a duty of trust, loyalty and confidence to another. ... an agent owes a fiduciary duty to his or her principal, as does a trustee to the beneficiary of a trust and a partner to her copartners. A fiduciary may not deal at *arm's length* but rather owes a duty to make full disclosure of all relevant facts when entering into a transaction with the other party to the relationship. " "A fiduciary duty arises out of a relationship of trust and confidence. [It is a] duty imposed by law; an agent owes it to his principal and an employee owes it to his employer. The fiduciary duty is one of utmost loyalty and good faith ..." [Smith and Roberson's **Business Law**, 12th Edition, page 178, page 309]

This relationship applies in considerations of

- Duties of diligence, obedience and loyalty
- Conflicts of interest and the duty to inform
- Self-dealing – (prohibited)
- Duty not to compete and duty to account for financial benefits
- Duty to maintain the confidentiality : "An agent may not use or disclose confidential information obtained in the course of the agency for his own benefit or contrary to the interest of his principal. Confidential information is information that, if disclosed, would harm the principal's business or that has a value because it is not generally known." ["An agent may ... reveal confidential information that the principal is committing, or is about to commit, a crime."] [pp. 309-310]

A fiduciary must deal honestly, openly and with active full disclosure in the best interests of her or his client as that interest is identified and or defined by that client. There can be no "arm's length" between a fiduciary and the fiduciary's client. The fiduciary's relationship to the client should be one of legitimate trust built on the fiduciary's factual integrity and open honesty in her or his dealings in spirit and in word of law with the client. The client's interests must always, clearly take precedence over the fiduciary's own interests.

*For the "**Policies and Procedures**" on the following pages, initial those ____ optional procedures / policies adopted; strike through items not to be included.*

Code of Ethics : Policies and Procedures

*A copy of the Adviser's code of ethics is available upon request by any client or prospective client.

- The compliance officer shall obtain a written acknowledgement from associates of the firm, including all supervised persons, confirming that person's having read a copy of the firm's code of ethics as provided to each such person.
- Periodically: [*annually*] the Code of Ethics shall be reviewed by Mr. Addeo and by any associates and supervised persons he deems necessary, which they shall evidence by signing and dating anew the Ethics Code.
- Privacy of Information and the Protection of Material, Non-Public Information : signatories must understand and agree that all information about clients, past

	<p>and present, and potential customers must be kept confidential, may be supplied only to the appropriate persons who require the information in order to service the client and only as is agreed to by the client. The only situations in which client information may be shared with other parties without client permission are:</p> <ul style="list-style-type: none">○ When the information concerns illegal activities, to include money laundering, on the part of the client or prospective customer○ When the law requires the information be provided to a specified recipient <ul style="list-style-type: none">▪ Suitability of recommendations : All recommendations made to any client must be based on independent, thorough, careful research and objective information as the client makes information available to the adviser. If information is deemed lacking or insufficient, the firm / representative will contact the client or agent.▪ Associates shall make recommendations and investments only as they are consistent with the client's stated objectives and by the methods agreed to.▪ Written contracts shall be completed accurately and signed and dated by the appropriate party/ parties only.▪ _____ Are all contracts are to be renewed in writing periodically : _____ .▪ Contractual arrangements shall be made only in an overriding fairness toward the client, never seeking to take advantage of any client(s).▪ No promises shall be made regarding investment performance, nor any implication that past performance indicates future performance. Performance information must be objective, accurate, fair, complete, and representative.▪ The investment adviser shall make full disclosure of, and obtain informed consent to, the services and costs of services offered by the investment adviser.▪ The adviser shall make full disclosure of any and all conflicts of interest. The investment adviser shall make full disclosure of any information that may affect the client's choices of advisory persons, investments, or other decisions.▪ The investment adviser shall make full disclosure of all custody situations, those allowing the advisor access to the client's property, obtain informed consent to any custody arrangement, and be aware of and scrupulously follow all rules and regulations regarding the custody of client property. <p>Code of Ethics : <u>INSIDER INFORMATION</u></p> <p>Insider information is any information not readily obtainable from public sources with reasonable research. All recommended, planned or actual individual client transactions are private information for that account only and may not be used as the basis for other persons' investment actions. In order to enforce the prohibition against the use of Insider Information :</p>
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	<p style="text-align: center;"><u>Risk exposure to possible violations of the prohibition against the use of insider information:</u></p> <p><i>It is possible that a client may present information that would constitute insider information at any time.</i></p> <p><u>Measures the firm will use to guard against the prohibited use of insider information</u></p> <p><i>Mr. Addeo is aware of the severity of the prohibition against using any insider information and undertakes in writing to state that he will not use insider information for his profit or for the benefit of his near family or for other persons. Further, Mr. Addeo will obtain signed statements from the personnel in his office that they also understand and will abide by the prohibition. If requested to do so, they will present current copies of all statements showing their transactions in securities markets.</i></p> <p><i>If a situation arises in which Mr. Addeo believes that insider information may have been made available to persons in his office, he may issue a requirement that no personnel make any transactions in one or more stated securities and require that personnel present copies of current transaction statements for themselves and for their near relatives, in order to monitor whether the information known may appear to have been acted on.</i></p> <p><i>Persons believed to have used insider information may be subject to loss of employment, prosecution, and fines or imprisonment or both.</i></p> <p>All access persons must provide the review officer with duplicates of all trade confirmations and account statements or in some manner report their personal securities transactions and holdings if requested to do so by the person designated to review securities transactions and holdings of all access persons : Mr. Addeo is the designated reviewer.</p> <p>If requested, access persons must provide quarterly reports, no later than 30 days after the close of each calendar quarter, showing all personal securities transactions; they may be required to present those of near relatives as well. [exceptions :]</p> <ul style="list-style-type: none"> ▪ 1) transactions effected within an automatic investment plan ▪ 2) Securities held in accounts over which the access person has no direct or indirect influence or control ▪ 3) firms in which there is only one access person, in which case the firm will maintain records of the holdings and transactions that Rule 204A-1 would require. <p><u>Insider Information</u> : terms</p> <p>* “Access Person” = a supervised person who has access to non-public information regarding clients’ purchase or sale of securities, is involved in making securities recommendations to clients or has access to non-public information on the portfolio holdings of affiliated</p>
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mutual funds.

All securities are reportable except : (5)

- **transactions and holdings in direct obligations of the United States government**
- **money market instruments** (bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements, other high quality, short term debt instruments)
- **shares of money market funds**
- **transactions and holdings in shares of other types of mutual funds**, (unless the adviser or a control affiliate acts as the investment adviser or principal underwriter for the fund)
- **transactions in units of a unit investment trust if the UIT is invested exclusively in unaffiliated mutual funds**

Other / optional measures, initial those chosen; add notes as suitable:

_____ Limitations on the number of brokerage accounts permitted :

_____ Maintain a list of those securities on which the investment adviser provides advice, as a check against holdings and intended transactions on the part of access personnel

_____ Maintain a "Restricted List" of issues on which the IA has inside information and [prohibit any transactions in any such listed security]

_____ Procedures for personnel to obtain any analyses or opinion papers/ records regarding securities recommended or to be recommended to clients [check out "library" system] [notations on apparent conflicts of interest]

_____ Blackout period maintained during which client transactions are placed and no access person/ associate may place trades in the same security

_____ Prohibitions on "short swing" trading and market timing

_____ IPO's and Private Placements [**applicable / NA**] (from above) :

_____ Report securities transactions and holdings by _____ (means) (weekly / monthly / quarterly)

Persons identified as applicable "access" persons:

- 1. G. Addeo
- 2.
- 3.

Other persons to be included within the scope of this provision:

- 1.
- 2.

Reports to be reviewed by Mr. Addeo and documented as reviewed. [with the purpose of identifying improper trades or patterns of trades and to prevent such.]

II. Ethical duties to other parties:

To the LAW: Associates / employees must know and understand those areas of their activities within the firm that are addressed by Federal and/ or State Law and Regulation and agree to comply with those laws, rules and regulations, including:

	<ul style="list-style-type: none"> ▪ Insider Information ▪ AML – Anti-money-laundering procedures [“Know your customer”] ▪ Privacy Policy Statements ▪ Disclosure Brochures ▪ Custody, constructive forms of custody <p><u>To the Regulator(s)</u></p> <ul style="list-style-type: none"> ▪ All documents requested by an authorized regulator are to be provided promptly and completely. <p><u>To one’s Profession</u></p> <ul style="list-style-type: none"> ▪ Representations of qualifications, registrations and work to the public and colleagues shall be truthful. <p><u>To one’s Employer and Firm</u></p> <ul style="list-style-type: none"> • Employees owe their employer a duty of diligence, timeliness, honesty, knowledgeableness, and pro-active communication of all concerns material to the efficient functioning of the firm. Diligence includes an honest report of past experiences and qualifications, serious effort to attain to and apply stated educational or technical capabilities and standards of conduct, and a pro-active effort to keep appropriate persons in the firm apprised of information that may be of importance to the firm or those persons in the exercise of their business duties. Diligence includes also the use of reasonable care and independent judgment in the daily conduct of one’s stated duties. <ul style="list-style-type: none"> ▪ Keeping stated appointments ▪ Performing assigned tasks in a timely manner ▪ Employees may not accept or solicit any gifts, benefits, compensation or consideration from any client or firm associate that reasonably could, or could be construed as able to, compromise the employee’s or associate’s objectivity, independence or loyalty to the firm or adherence to the law or any applicable Code of Ethics. • The firm’s property must be cared for and accounted for; removal of any such property from the firm’s premises without appropriate authorization to do so may constitute theft and be grounds for immediate dismissal. Property includes all records and business forms or manuals. • Employees /Associates must not do harm to their employer. • Employees owe their employer an efficient use of time and company equipment for company needs only. • Employees owe the firm and its clients either a personal familiarity with the procedures and forms required for services to be provided or else a duty to enjoin a qualified person to handle any situation that may require such familiarity. • Employees and /or Associates of the firm may be dismissed for any of the following reasons: <ul style="list-style-type: none"> * Deceit – Knowingly making a material misstatement of fact to any officer or other associate who may reasonably be believed to rely on the information provided in the course of making business decisions on behalf of this firm [information may include documents, written or verbal instructions or messages,]; * Knowingly withholding any material information that reasonably may be believed to be needful [or useful] to other employees / associates of the firm in
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	<p>the course of business; * Failure to maintain confidentiality with regard to the firm's clients or its business practices * Disturbing behavior, noise, language, activities; * Failure to maintain an orderly work environment [____ after comment / warning from an appropriate officer] * ____ Using the Internet / Emails for purposes other than company business / as directed.</p> <p><u>To one's Fellow employees</u> or associates of the firm</p> <ul style="list-style-type: none"> To one's fellow employees / associates each person in this firm owes the courtesy, efficiency and willingness to cooperate that may allow all persons in the firm to function at their most proficient level, to include a sense of well-being and physical, emotional and psychological security. No associate shall impose upon any other person of this firm unwelcome presentations of the following types : ____ sexual; ____ political; ____ religious; ____ other : <p>NOTE:</p> <p>III. Rule 204-2(a)(12) requires adviser</p> <ul style="list-style-type: none"> to keep copies of the firm's Code of Ethics; to keep copies of written/ signed acknowledgments of receipt of the Code; to keep records of any violations of the code and actions taken as a result of the violations [<i>additionally, the IA may choose to require that written reports by "whistleblowers" be retained</i>] <p>Other notations:</p> <hr/> <p>Adopted on <u>June 8, 2006</u></p> <p>Accepted by: <u>G. Addeo</u></p>
<p>11. Review of Accounts. A.</p>	<p>Accounts are reviewed on a monthly, quarterly and annual basis. Different levels. Triggering factors. Accounts are reviewed by 2 reviewers, the Financial Advisor, who provides investment advice to clients, and the Assistant Financial Advisor, who processes client requests. The instructions for the review are: _____</p>
<p>11. Review of Accounts. B.</p>	<p>Clients receive a Quarterly Report that contains a Portfolio Summary, with the Beginning Market Value, Net Contributions and Withdrawals, Portfolio Gain/Loss and Ending Market Value of the account for the current quarter and annually since inception; a description of the portfolio Composition; the Performance that contains a chart that compares the client's portfolio with its benchmark; and the Risk Statistics. For each account, the report contains: Summary, Holdings and Performance.</p>

Form ADV Part II
Schedule F

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