

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

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Name of Investment Adviser:					
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone number: ()

**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:

SEC File Number:
801-

Date:

- 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 type="checkbox"/> | (1) | Provides investment supervisory services | _____ | % |
| <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 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 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 type="checkbox"/> A. Individuals | <input 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).

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

- | | |
|---|---|
| <input type="checkbox"/> A. Equity securities | <input 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 type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| <input type="checkbox"/> 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 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 type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

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

- | | |
|--|--|
| (1) <input type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input type="checkbox"/> Research materials prepared by others | (7) <input 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 type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

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

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

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

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

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

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

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input 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.)

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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

☐ ☐

(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.

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

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Date:

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 type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? | <input type="checkbox"/> | <input 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 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 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
<input type="checkbox"/> | No
<input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes
<input type="checkbox"/> | No
<input 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

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: IndexEdge Investment Consulting, LLC	SEC File Number- 801- _____	Date: 11/6/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

I. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: IndexEdge Investment Consulting, LLC		IRS Empl. Ident. No.:
Item of Form Answer (identify)	Answer	

Item 1(D)

Advisory Services and Fees

IndexEdge Investment Consulting, LLC ("the Adviser") provides investment advice to separately managed accounts of high net worth individuals. In addition, the Adviser may, from time to time, provide investment consultations on an hourly fee basis.

Separately Managed Accounts

The Adviser evaluates a client's financial situation through a review of financial information and in-depth personal interviews that include understanding the client's investment objectives, risk tolerances and other relevant factors that may assist in ascertaining an appropriate asset allocation for the client. It then recommends an appropriate investment strategy based upon this assessment. The Adviser's strategy is generally based upon diversification across multiple asset classes utilizing cost-efficient index funds and exchange traded funds ("ETFs"); however, the Adviser may utilize other securities in constructing and managing the portfolio. Client restrictions and guidelines may affect the composition and performance of portfolios. Accordingly, performance of portfolios with similar objectives may differ and clients should not expect that the performance of their portfolios will be identical with other client portfolios. Client portfolios are generally managed on a discretionary basis.

The client will pay the annualized fees described below:

PORTFOLIO VALUE	ANNUAL FEE
\$1,000,000 or less	0.50% of assets
Over \$1,000,000	0.45% of assets
Over \$3,000,000	0.40% of assets
Over \$5,000,000	0.35% of assets

The fees set forth above do not include commissions on securities transactions, miscellaneous brokerage charges, or custodial fees.

The minimum annual fee per household is \$1,000. The fee is payable in arrears on a quarterly basis. The fee is charged as a percent of the average market value of the account for the quarter. Fees are negotiable for accounts over \$5 million, family accounts, and referrals. Clients who utilize the Adviser's services for only a portion of the quarter will pay a prorated fee based upon the number of days in the quarter in which services are rendered. The contract for asset management services may be terminated at any time by either party upon written notice. Any fees paid in advance are refunded to the client, prorated to the amount of days in the quarter for which services were provided. A full refund will be provided without penalty if the client terminates the contract, in writing, within five (5) business days of signing.

All client assets will be held by the custodian of the account. The Adviser will not hold customer funds or securities. The client may grant the Adviser the authority to receive quarterly payments directly from the client's account held by an independent custodian. Accordingly, the client will provide, in writing, limited authorization to withdraw the contractually agreed upon fees from the account. The custodian of the account is advised in writing of the limited authorization of the Adviser's access to the account. The custodian will send to the client a statement, at least quarterly, indicating all amounts disbursed from the account, including the amount of advisory fees paid directly to the Adviser.

Investment Consultations

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: IndexEdge Investment Consulting, LLC	SEC File Number- 801- _____	Date: 11/6/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

I. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: IndexEdge Investment Consulting, LLC	IRS Empl. Ident. No.:
Item of Form Answer (identify)	Answer

Item 1(D) (continued)	The Adviser may provide investment consultations on a limited basis and at the discretion of the Adviser. When the Adviser is engaged to provide direct investment consultations, fees will be charged at a rate of \$250 per hour. Hourly fee charges are negotiable and may be waived for clients who engage the Adviser's asset management services described above. The Adviser may refuse any request for direct investment consultation.
Item 5	<u>Educational and Business Standards</u> Associated persons of the Adviser providing investment advice will be required to complete examinations based on each state's license requirements. Continuing education activities will also be required.
Item 6	<u>Educational and Business Background</u> Michael H. Smither, Managing Partner (DOB: 12/07/1966) <u>Education:</u> University of Virginia, Charlottesville, Virginia, B.A. in Economics, 1988 Paul M. Hebert Law Center, Louisiana State University, J.D., 1994 <u>Business Background:</u> IndexEdge Investment Consulting, L.L.C. Managing Partner April 2005 - Present Merrill Lynch Private Client Group Financial Adviser May 2003 - April 2005 Hibernia Private Client Group Financial Adviser August 1999 - May 2003
Item 9(E)	The Adviser may at times determine that certain securities will be suitable for acquisition by the separately managed accounts managed by the Adviser and accounts of the Adviser, its affiliates or its personnel. If that occurs, and the Adviser is not able to acquire the desired aggregate amount of such securities on terms and conditions which the Adviser deems advisable, the Adviser will not trade for its own account or for an account of an advisory affiliate and will endeavor in good faith to allocate the limited amount of such securities acquired among the various other accounts for which the Adviser considers them to be suitable. The Adviser may make such allocations among the accounts in any manner which it considers to be fair under the circumstances, including, but not limited to, allocations based on relative account sizes, the degree of risk involved in the securities acquired, and the extent to which a position in such securities is consistent with the investment policies and strategies of the various accounts involved. Associated persons may own an interest in or buy or sell for their own accounts the same

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: IndexEdge Investment Consulting, LLC	SEC File Number- 801- _____	Date: 11/6/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

I. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: IndexEdge Investment Consulting, LLC	IRS Empl. Ident. No.:
Item of Form Answer (identify)	Answer

**Item 9(E)
(continued)**

securities that may be purchased or sold in the accounts of advisory clients. In all cases, client orders are given priority. In no case shall an associated person receive a better price or more favorable circumstances than a client. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to clients.

The Adviser has adopted a Code of Ethics and Statement for Insider Trading. The Code contains provisions reasonably necessary to deter misconduct and conflicts of interest and to detect any violation. The Statement for Insider Trading bars trading on material non-public information.

CODE OF ETHICS SUMMARY

The Adviser has adopted policies and procedures to prevent the misuse of material non-public information and to detect and prevent insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Adviser does not deem appropriate to buy or sell for clients. Personal transactions of associated persons are regularly monitored to ensure that client interests are put first in all relevant circumstances.

The Adviser has adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Adviser and its personnel owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. The Adviser will provide a copy of the Code of Ethics to any client or prospective client upon request.

Item 10

Conditions for Managing the Account

The Adviser's minimum annual fee for separate account clients per household is \$1,000. Allowances may be made for family members and referrals. The Adviser is not responsible for assets held by a client that are not included in the Adviser's advisory services agreement. Unmanaged positions may be held in an account and no fee will be charged for those positions. The Adviser has no responsibility or obligation to render investment advice or decisions on unmanaged assets.

The Adviser is an investment advisory firm. While some financial planning and tax management strategies are a natural part of managing any investment portfolio, the Adviser is not compensated for these services. Furthermore, the Adviser explicitly does not engage in the offering of tax advice or legal advice.

**Items 11(A) and
11(B)**

Account Reviews

Separate Account Reviews

The Adviser reviews all trades on a daily basis to ensure that they are in accordance with the guidelines for each separate account client of the Adviser. In addition, the Adviser conducts

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

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

I. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: IndexEdge Investment Consulting, LLC	IRS Empl. Ident. No.:
Item of Form Answer (identify)	Answer

Items 11(A) and 11(B) (continued)	<p>monthly reviews for performance, guideline and benchmark dispersions and trading errors.</p> <p><u>Client Reporting</u></p> <p>Client performance reporting requirements are determined by the terms of the Investment Management Agreement ("IMA"), including the Investment Advisory Contract and other disclosure documents. On a monthly basis, separately managed account clients receive a statement from the custodian that details the holdings and indicates performance. Separately managed account clients will have the opportunity to meet with the Adviser on a quarterly basis to review portfolio performance and discuss portfolio adjustments.</p>
Items 12(A)(1) and (2)	<p><u>Investment Discretion</u></p> <p><u>Separately Managed Accounts</u></p> <p>The Adviser will assume all investment responsibility and will have sole discretionary investment authority with respect to the investment, sale and reinvestment of the securities, property, cash and other investments in a separate account client account at such times and in such a manner as the Adviser deems advisable in accordance with, and subject only to, such investment objectives, limitations, and parameters as may be set forth in the IMA, as amended or supplemented in writing.</p>
Items 12(A)(3) and (4) and 12(B)	<p><u>Brokerage Discretion</u></p> <p><u>Separately Managed Accounts</u></p> <p>For separately managed accounts, the client selects the broker based upon recommendations by the Adviser. In recommending the broker, the Adviser considers such factors as price, the ability of the broker to effect the transactions, the broker's facilities, reliability and financial responsibility. In addition, the Adviser may consider the fact that the broker has furnished, or has agreed to furnish in the future, research or other information or services which may enhance the Adviser's investment research and portfolio management capability, generally. It is also understood that the broker may be the source of future referrals to Adviser of other advisory clients.</p> <p>Commission rates will be the lowest rate available to the Adviser based on its volume of activity with recommended brokers; however, commissions may be charged which are higher or lower than commission rates at other broker dealers. The Adviser monitors the execution quality of recommended brokers on a regular basis to ensure clients continue to receive high quality executions.</p> <p>If a client directs the use of a specific broker that is not recommended by the Adviser, the Adviser has not negotiated the terms and conditions (including, but not limited to, commission rates) relating to the services provided by such broker. Rather, the client and the specified broker agree on the commission rate that the specified broker will charge for transactions effected for the amount. As a result, and depending upon (a) the client's arrangement with the specified broker, (b) such factors as the number of securities, instruments or obligations being bought or sold for the client, whether round or odd lots are being acquired for the client and the market for the security, instrument or obligation, and (c) the fact that the client will be foregoing any benefit from savings on execution costs that</p>

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: IndexEdge Investment Consulting, LLC	SEC File Number- 801- _____	Date: 11/6/2009
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I. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: IndexEdge Investment Consulting, LLC	IRS Empl. Ident. No.:
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Item of Form Answer (identify)	Answer
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**Items 12(A)(3) and
(4) and 12(B)
(continued)**

Adviser could obtain for its clients through negotiating volume commission discounts on batched transactions, the client may pay higher commissions than those paid by Adviser's clients who have not directed Adviser to execute transactions through a specified broker or dealer.

All Clients

The Adviser is required to seek best execution for all client transactions. The Adviser may recommend brokers to separate account clients who also provide brokerage and research services as those terms are defined in Section 28(e) of the Securities and Exchange Act of 1934 ("Soft Dollars"). The Adviser is authorized to pay a broker or dealer who provides such brokerage and research services a commission for executing a portfolio transaction for clients which is in excess of the amount of commission another broker or dealer would have charged for effecting that transaction if the Adviser determines in good faith that such amount of commission is reasonable in relation to the value of the brokerage and research services provided by such broker or dealer. This determination may be viewed in terms of either that particular transaction or the overall responsibilities that the Adviser has with respect to accounts over which it exercises investment discretion. It is the policy of the Adviser to comply with the safe harbor provisions set forth in Section 28(e).

It should be noted, however, that one (1) account may pay higher brokerage commissions than are otherwise available, while the research and other benefits resulting from the brokerage relationship would benefit all accounts managed by the Adviser or the Adviser's operations as a whole. Adviser's relationships with brokerage firms that provide Soft Dollar services to the Adviser may influence the Adviser's judgment in allocating brokerage business and create a conflict of interest in using those brokers to execute brokerage transactions for the Adviser's clients, particularly to the extent that the Adviser uses the goods or services or Soft Dollars provided to pay expenses the Adviser would otherwise be required to pay itself.

It is the Adviser's basic policy that no client for whom the Adviser has investment decision responsibility shall receive preferential treatment over any other client. In allocating securities among clients, it is the Adviser's policy that all clients should be treated fairly. The Adviser may aggregate sale and purchase orders of securities of the various accounts it advises if, in its judgment, such aggregation is reasonably likely to result in an overall economic benefit to those accounts, in the aggregate, based on an evaluation that the accounts will benefit from relatively better purchase or sale prices, lower commission expenses or beneficial timing of transactions, or a combination of these and other factors. In many instances, the Adviser purchases or sells securities for the accounts it advises simultaneously. Such transactions may be made at slightly different prices, because of the volume of securities purchased or sold. In such an event, each account may be charged or credited, as the case may be, the average transaction price of all securities purchased or sold in such transactions. As a result, the price may be less favorable to any one (1) account than it would be if similar transactions were not being executed concurrently for other accounts.

**Proxy Voting
Policies and
Procedures**

PROXY VOTING POLICIES AND PROCEDURES

Policy

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

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

I. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: IndexEdge Investment Consulting, LLC	IRS Empl. Ident. No.:
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Item of Form Answer (identify)	Answer
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**Proxy Voting
Policies and
Procedures
(continued)**

The Adviser acts as a discretionary investment adviser to various separately managed accounts. The Adviser is responsible for seeing that all proxies and other corporate actions are acted upon in a timely manner as part of its discretionary authority over client assets, unless the IMA specifically states that proxy voting is the responsibility of the client. The Adviser's proxy voting policies and procedures are designed to ensure that the Adviser will act in a prudent and diligent manner and to ensure compliance with the Advisers Act Rule 206(4)-6 ("Proxy Rule") regarding proxy voting. Currently, the IMAs that the Adviser has with its separate managed account clients expressly state that voting proxies is the responsibility of the client, not the Adviser. The Adviser will provide a copy of its proxy voting policies and procedures and/or how the Adviser voted proxies, if applicable, to any client upon written request.

Procedures

The Adviser is ultimately responsible for ensuring that all proxies over which it has voting authority that are received by the Adviser are voted in a timely manner and in a manner consistent with the Adviser's determination of the client's best interests. Although many proxy proposals can be voted in accordance with the Adviser's established guidelines, the Adviser recognizes that some proposals require special consideration, which may dictate that the Adviser make an exception to the Guidelines. Such exceptions will be noted and kept on file in accordance with Rule 204-2 under the Investment Advisers Act of 1940. The Adviser is also responsible for ensuring that all corporate action notices or requests which require shareholder action received by the Adviser are addressed in a timely manner and consistent action is taken across all similarly situated client accounts.

Privacy Policy

PRIVACY POLICY

As part of our compliance with the provisions of certain privacy regulations issued by the United States federal government, we are required to provide you with notice of our policies and practices relating to the use and sharing of your personal information.

This policy describes the steps we have taken to safeguard your information and what client information we may share with others.

We collect the following types of non-public personal information about you:

- Information we receive from you to open an account or provide investment advice to you (such as information on applications); and
- Information about your transactions with us, our affiliates, or others that we may receive from third parties (such as trade memoranda, account statements and confirmations).

We restrict access to non-public personal information about you to our employees, affiliates and service providers who need to know that information in order to provide products and services to you.

We maintain physical, electronic and procedural safeguards that we believe are reasonably designed to guard your non-public personal information while it is within our control.

We have not and will not sell your non-public personal information to anyone, even if our formal relationship ends.

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: IndexEdge Investment Consulting, LLC	SEC File Number- 801- _____	Date: 9/17/2008
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

I. Full name of applicant exactly as stated in Item IA of Part I of Form ADV: IndexEdge Investment Consulting, LLC	IRS Empl. Ident. No.:
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Item of Form Answer (identify)	Answer
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Privacy Policy (continued)	We do not disclose any non-public personal information about our clients or former clients to anyone, except to our employees, affiliates and services providers and as permitted by law and in accordance with any applicable investment management agreements or subscription agreements.
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