



PORTFOLIO DESIGN ADVISORS

A Registered Investment Advisor

DISCLOSURE STATEMENT

Dated:
January 2009

3010 Old Ranch Parkway, Suite 560
Seal Beach, CA 90740

FORM ADV

**Uniform Application for Investment Adviser
Registration**

**Part II -
Page 1**

OMB APPROVAL

OMB Number 3235-0049

Expires Feb 11, 2011

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hours per response. . .4.07

Name of Investment Adviser:

Portfolio Design Advisors

Address: (Number and Street)

(City)

(State)

(Zip Code)

Area Code: Telephone Number:

4332 Cerritos Avenue, Suite 100

Los Alamitos

CA

90720-2557

(714) 229-2266

**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 government authority.**

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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.

Investment Supervisory Services - Giving continuous investment advice to a client (or making investments for the client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client's personal and family obligations.

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	100%
<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.)

		Yes	No
B.	Does the applicant call any of the services it checked above financial planning or some similar term?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 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 checked="" 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 | | |

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"/> (2) securities traded over-the-counter | <input type="checkbox"/> I. Options contracts on: |
| <input type="checkbox"/> (3) foreign issues | <input type="checkbox"/> (1) securities |
| | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | |
| <input type="checkbox"/> C. Corporate debt securities | <input type="checkbox"/> J. Futures contracts on: |
| (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> D. Commercial paper | |
| <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"/> (2) oil and gas interests |
| <input type="checkbox"/> G. Investment company securities | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> (1) variable life insurance | |
| <input type="checkbox"/> (2) variable annuities | <input checked="" 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 checked="" 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 checked="" type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

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 type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input checked="" 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.)

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.)

- 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.

The client accounts are reviewed by one or both of the portfolio managers regularly. The frequency of the review may be different for different clients, depending on the investment model that the client selected. Generally, reviews will be conducted at least monthly. Triggering factors for review include: market conditions, news releases from one of the mutual funds in which the client is invested, the need to rebalance the client's account, or a request from the client.

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

A quarterly written report and billing statement is issued to the client according to the Select One Investment Management Agreement. On occasion, a special report may be issued as a result of a material event.

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

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:
Portfolio Design Advisors

SEC File Number:

801-23837

Date:

January 2009

(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:
Portfolio Design Advisors

IRS Empl. Ident. No.:

Item 1A, 1D

Portfolio Design Advisors ("PDA")

PDA provides managed account and account supervisory services under the name "Select One" as described herein. The Fees for these services may be higher or lower than those charged by other advisers for comparable services.

In addition, to the Select One account portfolios, some personal clients of Philip S. Kelley may have managed accounts which may include options or individual stocks, as detailed in their individual Investment Management Agreements.

Select One Investment Management Agreements are ongoing, and may be terminated at any time upon 30 days prior written notice by either party. Fees will be pro-rated to the date of termination.

Investment Management Fees are withdrawn quarterly and in arrears, from the client's account with Pershing LLC (Pershing), the custodian holding the client's funds and securities, and pursuant to the client agreement. PDA will mail notice of fee billing to the client concurrently with the withdrawal of fees. The billing notice will provide the value of the account, the amount to be deducted and the method of fee calculation. It is the client's responsibility to verify the accuracy of the fee calculation; Pershing LLC will not determine the accuracy of the fee calculation. PDA notifies Pershing of the amount of the fees to be paid by the client. Pershing also agrees to send quarterly statements to the client indicating all amounts disbursed from the client's account. Fees for the first quarter are charged on a pro-rata basis.

Besides those fees paid to PDA for advisory services with respect to clients' investments in mutual funds, clients pay additional fees on the mutual fund investment because the mutual fund companies also pay advisory and/or management fees to an investment advisor.

Any controversies between PDA and the Client arising out of the business of PDA or this Agreement, except for those disputes that cannot be arbitrated as a matter of law, shall be submitted for arbitration conducted under the provisions of the commercial arbitration rules of the American Arbitration Association. Arbitration must be commenced by service upon the other party of the written demand for arbitration, or a written notice of intention to arbitrate. Judgment upon any award rendered by the arbitrators shall be final and may be entered in any court having jurisdiction thereof. This clause does not constitute a waiver of any right provided by the Investment Advisors Act of 1940, as amended, including the right to choose the forum, whether arbitration or adjudication, in which to seek resolution of disputes.

Item 1A(1)

Select One
Managed Account and Investment Supervisory Services

Select One exclusively involves investment supervisory services with respect to mutual funds and exchange traded funds ("ETF's"). The program generally utilizes asset allocation strategies and does not attempt to engage in market timing or short-term trading. The program utilizes a number of pre-determined portfolio models. Clients select one of the portfolio models based on risk tolerance and investment objective.

Select One managed asset program generally utilizes mutual funds that may include "no-load" as well as funds at net asset value or "load waived" funds.

Accounts may be periodically rebalanced to the original allocation mix. In addition, allocations may change from time-to-time depending on market conditions and/or changes in client goals and objectives. The program seeks to enhance long-term performance, while reducing volatility risk. There is no guarantee, either implied or expressed, that such objectives will be met. Furthermore, over the long-term, the program may be more expensive to clients than purchasing mutual funds or other investments held over the same period.

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:
Portfolio Design Advisors

SEC File Number:

801-23837

Date:

January 2009

(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:
Portfolio Design Advisors

IRS Empl. Ident. No.:

All assets are held in custody by Pershing, LLC.

All securities remain titled with the name of the client or trustee, allowing the client to withdraw, hypothecate, vote proxies and/or pledge any or all of the securities held by the clearing broker/dealer (Pershing). Pershing issues all confirmations, as well as account statements. Each client may restrict PDA's selection of securities for its program by indicating such restrictions in the individual client's Investment Management Agreement or by subsequent written request to PDA.

Select One

- A centrally managed discretionary portfolio of "no-load" and "load waived" mutual funds,
- The minimum account size is \$100,000 although smaller account sizes may occasionally be accepted.
- Transaction charges for Pershing trade execution are absorbed by the program.
- Quarterly performance reporting is provided by PDA.
- Periodic brokerage statements, provided by Pershing, are included.

Fees

Investment Management Fees are calculated as a percentage of assets under management. The actual percentages may differ and are based on the type of assets that are managed as well as the size of the client's account. Fees charged are as follows:

Assets under Management

\$100,000-\$250,000-----75 basis pts

\$250,000-\$750,000-----30 basis pts

\$750,000-\$1,500,000-----15 basis pts

Over \$1,500,000-----Negotiable

Lower fees may be available for larger accounts. The minimum account size is generally \$100,000 although smaller account sizes may on occasion be accepted. Investment Management Fees are withdrawn from the Pershing account quarterly and in arrears, pursuant to the client agreement, and concurrently with the mailing of notice to the client. The billing notice will provide the value of the account, the amount to be deducted and the method of calculation. Fees for the first quarter are charged on a pro-rata basis.

The above fee schedule pertains **only** to fees charged by Select One and does not include fees that are charged to the client by financial advisors and/or firms who recommend Select One to the client and thus act as solicitors on behalf of Select One. PDA pays a percentage of its fees to financial advisors and firms who act as solicitors on its behalf.

In addition to fees paid for advisory services, clients pay fees to the mutual fund company because the mutual fund companies also pay advisory and/or management fees to an investment advisor. Mutual funds may on occasion also impose a redemption fee that may be charged to the client. Details for these fees may be found in the mutual fund prospectus.

After the first five (5) business days following execution of the Investment Management Agreement, this Agreement may be terminated at any time upon 30 days prior written notice by either party. Fees will be pro-rated to the date of termination.

FEES PAID IN ADVANCE WILL BE REFUNDED IN FULL IF CLIENT CANCELS AN AGREEMENT WITHIN FIVE (5) BUSINESS DAYS AFTER SIGNING. AFTER FIVE (5) BUSINESS DAYS, FEES ARE PRO-RATED BASED ON THE DATE OF TERMINATION AND WORK COMPLETED.

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:
Portfolio Design Advisors

SEC File Number:

801-23837

Date:

January 2009

(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:
Portfolio Design Advisors

IRS Empl. Ident. No.:

Item 3L

Select One Accounts may be invested in various types of mutual funds, including ETF's.

Items 4A, 4B, 4C

The firm utilizes many and varied types of research as well as commercial rating services. The research is analyzed extensively and used as a basis for investment recommendations and portfolio allocations.

Various portfolio models are utilized based on the client's financial objectives and risk tolerance. A strategy consisting of a combination of strategic and tactical asset allocation and/or sector rotation is employed in the management of all models.

Item 5

Both principals of the firm have many years experience managing client assets.

Item 6

Douglas W. Baker, CFP® (Born 1949)

Education:

University of California at Los Angeles, CA – Credential in Accounting, 1975

University of Southern California / College of Financial Planning, Denver, CO, CFP® Designation, 1985

Business Background:

Portfolio Design Advisers, Los Alamitos, CA – President, 2005 to present

Meridian Capital Management, Inc., Los Alamitos, CA – President, 1998 to present

Geneos Wealth Management, Inc., Denver CO – Registered Principal, 2006-Present

Associated Securities Corp., Los Angeles, CA - Registered Principal, 1984 to 2006

Douglas W. Baker, CFP®, Los Alamitos, CA – Sole Proprietor 1980 to present

Philip S. Kelley, CFP® (Born 1930)

Education:

University of Tennessee Memphis, North Carolina State, Newbern, North Carolina

College for Financial Planning, Denver, Colorado, CFP® Designation, 1987

Business Background:

Portfolio Design Advisers, Los Alamitos, CA – Lead Manager and Portfolio Strategist

Associated Planners Investment Advisory, Inc., Los Angeles, CA - Advisory Affiliate, 1993 to 2006

Associated Securities Corp., Los Angeles, CA - Registered Principal, 1982 to 2006

Items 7C, 8C

Douglas W. Baker, is president of Meridian Capital Management, Inc., an SEC Registered Investment Adviser. In this capacity, he is actively engaged in financial planning, investment management and investment supervisory activities for clients who are not clients of PDA. He receives fees and occasionally commissions for these activities.

Douglas W. Baker, in his capacity as registered principal and licensed insurance agent with Geneos Wealth Management, Inc., makes investment recommendations to clients, who are not clients of PDA. He receives commissions and/or fees for these activities.

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:
Portfolio Design Advisors

SEC File Number:

801-23837

Date:

January 2009

(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:
Portfolio Design Advisors

IRS Empl. Ident. No.:

Item 9E

Douglas W. Baker and Philip S. Kelley may on occasion buy the same securities for themselves that they buy for their clients.

Item 10

The minimum account size is \$100,000 although smaller account sizes may occasionally be accepted.

Item 12A

The broker/dealer used for all transactions is Pershing LLC.

Item 13

PDA receives and compensates other Registered Financial Advisers for client referrals. All solicitors agreements are in compliance with the Investment Advisors Act of 1940 Section 275.206(4)-3. In addition, all applicable federal and state laws will also be observed. All clients procured by solicitors will be given full written disclosures describing the terms and fee arrangements between the advisor and the solicitor prior to or at the time of entering into the advisory investment management agreement.

Code of Ethics – Summary

- **A detailed Code of Ethics will be mailed to the Client upon request**

Portfolio Design Advisors adheres to a strict Code of Ethics based on the Principles of the CFP Board of Standards:

Principle 1 – Integrity

Portfolio Design Advisors shall offer and provide professional services with integrity.

Principle 2 – Objectivity

Portfolio Design Advisors shall be objective in providing professional services to clients.

Principle 3 – Competence

Portfolio Design Advisors shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which the CFP Board designee is engaged.

Principle 4 – Fairness

Portfolio Design Advisors shall perform professional services in a manner that is fair and reasonable to clients, principals, partners and employers, and shall disclose conflict(s) of interest in providing such services.

Principle 5 – Confidentiality

Portfolio Design Advisors shall not disclose any confidential client information without the specific consent of the client unless in response to proper legal process, to defend against charges of wrongdoing by Mason or its Advisory Affiliates or in connection with a civil dispute between the Mason or its Advisory Affiliates and client.

Principle 6 – Professionalism

The conduct of Portfolio Design Advisors in all matters shall reflect credit upon the profession.

Principle 7 – Diligence

Portfolio Design Advisors shall act diligently in providing professional services.

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:
Portfolio Design Advisors

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January 2009

(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:
Portfolio Design Advisors

IRS Empl. Ident. No.:

Privacy Policy

During the course of our relationship, Portfolio Design Advisors and Select One, (hereafter “We”) collect and retain non-public information (“NPI”) about you (e.g. name, address, Social Security number, birth date, assets and income) from the following sources:

- Investment Management Agreements, new account forms and other forms and agreements
- Transactions with us, our clearing firm, or other chosen investment sponsors
- Other various materials utilized by your representative in order to put forth an appropriate recommendation or to fill a service request

We may use this information in order to develop, offer, and deliver products and services; process transactions in your account; respond to inquiries from you or your representative; or to fulfill legal and regulatory requirements. We do not disclose/share any NPI of our customers or former customers to any unaffiliated third party unless:

1. It is necessary to fulfill a transaction or service request related to your account(s)
2. We are required to do so by a regulator, a court of competent jurisdiction or applicable law
3. It is by customer request

As this is our practice, we are not required to have “Opt-out” provisions or methods per the exemptive relief provided under section 248.13 of the Gramm-Leach-Bliley Act.

We restrict access of NPI to required personnel in the provision of requested services and maintain physical, procedural and electronic safeguards that comply with federal standards.