

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Ralph Parks Investment Group LLC	801- 65169	03/30/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Ralph Parks Investment Group LLC		IRS Empl. Ident.No.:
Item of Form (identify)	Answer	
Item 1.D Advisory Services	<p>Ralph Parks Investment Group, LLC ("RPIG" or "Adviser") is responsible for supervising the rendering of any investment advice that may be provided by its personnel. RPIG manages all client accounts through fee based services:</p> <ul style="list-style-type: none"> • Financial planning and implementation • Investment Management for the Ralph Parks Cyclical Equity Fund • Portfolio Management for the All-Cap Diversified Equity Growth Portfolio <p><u>Financial Planning and Implementation</u></p> <p>The Advisory client may participate in one or more of the RPIG advisory services. The scope of such services will be determined at the time such services are requested. Services are subject to the provisions of the respective Agreements, including the provisions relating to separate payment of fees and the limitations of Adviser's duties and liabilities. The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation from the Adviser. For certain clients, the advisor may provide advice concerning investments not involving securities products, as part of a total client portfolio.</p> <p>Fees are automatically deducted from the Client's account on a quarterly basis, in advance.</p> <p>Typically, the client is charged a single fee which includes the RPIG advisory, clearing and custody fee as well as the cost of all transactions executed through Excel Securities. RPIG uses the clearing and custody services of Pershing, a member of the New York Stock Exchange and SIPC, for safekeeping assets and Excel Securities for execution of securities transactions for its clients.</p> <p>Excel calculates the fee and directly debits the client account. Fees are automatically deducted from the Client's account on a quarterly basis, in advance. Fees are calculated as an annual percentage of assets based on the value of the account on the last day of the prior quarter. Fees are billed on a prorated basis from inception of the account for the remainder of the calendar quarter and quarterly in advance thereafter. Fees will be adjusted for significant contributions and withdrawals during the quarter. Clients who terminate during the quarter will receive a pro-rata reimbursement for pre-paid fees. Excel Securities collects fees and pays RPIG its portion.</p> <p>The schedule below reflects fees charged by Excel Securities on behalf of RPIG. Subsequent to Excel Securities deducting their own fees and other third party payments (which total approximately 45bp), Excel Securities remits the balance to RPIG.</p> <p>The fee schedule is:</p> <p>3.0% Fee for Managed Growth Portfolio Under \$500,000 2.5% Fee for Managed Growth Portfolio From 500,000 To \$1 Million 2.0% Fee for Managed Growth Portfolio Over \$1 Million</p> <p>There may be situations when a mutual fund or other vehicle will be used to fill a specific asset class. Mutual funds, or other vehicles that may be used in the clients account, may have charges and expenses that are imposed independently from RPIG and may include investment management administrative and transaction expenses. Therefore, in cases where mutual funds or other vehicles are used, the client may be charged the underlying management fee for these mutual funds or other vehicles. These are explained fully in the prospectuses or other disclosure documents that we deliver to clients.</p> <p>Certain RPIG employees may also act as broker-dealer representatives through Excel Securities.</p>	

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

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	<p>Under the supervision of Excel Securities RPIG registered brokers may execute non discretionary trades and receive commission based compensation through Excel Securities.</p> <p><u>Investment Management of the Ralph Parks Cyclical Equity Fund</u> The Fund entered into an investment advisory agreement with RPIG on June 1, 2006. The Advisor has overall supervisory responsibility for the general management and investment of the Fund and its securities portfolio. Under the investment advisory agreement, the Advisor manages the fund's investments and business affairs, subject to the supervision of the Board of Trustees. The Fund pays an annual investment advisory fee to the Advisor equal to 3.00% of the average daily net assets of the Fund.</p> <p><u>Portfolio Management for the Technical Analysis Growth Portfolio</u> RPIG utilizes proprietary technical formulas as the basis for investment decisions. The research process includes a proprietary screening and evaluation of investments, including stocks and mutual funds. RPIG's investment strategy is based on unique and proprietary software system of technical charting and analysis for long and short buying. Weekly, the software identifies the strongest performing stocks for the buy list and continuously monitors performance that, in turn, identifies an optimum sell point.</p> <p>RPIG's strategy is designed for the investor seeking above average returns while protecting capital from undue risk. RPIG invests in a variety of companies from many different sectors. The strategy continuously evaluates various market indices, inflation and individual stock performance to assure that the client is never left reacting to a market downturn after the fact.</p> <p>The All-Cap Diversified Equity Growth Portfolio is available to advisory clients of RPIG, and to other investment advisors. RPIG has agreements in place with the following advisors, who offer the All-Cap Diversified Equity Growth Portfolio under contractual agreements with RPIG.</p>	
Item 2. Clients	<p>Clients include individuals, investment companies, pension and profit sharing plans, trusts, estates and charitable organizations and other investment advisors.</p>	
Item 4. Method, Strategy	<p>RPIG method of analysis, investment strategy includes the All-Cap Diversified Equity Growth Portfolio described above.</p>	
Item 5 Education and Business Standards	<p>RPIG requires that employees have significant investment experience prior to providing services, other than clerical or administrative, to its investment advisory clients. Generally, this translates to at least 2 years experience in a related financial services business or equivalent education.</p>	
Item 6 Education and Business Background	<p>Name: Ralph Parks Date of birth: 02/9/1938 Education: B.S. Michigan State University MBA – Finance - Michigan State University History: President & C.E.O of Ralph Parks Investment Group 12/2005-present. 35 years in financial services industry after a long career in banking. Sr. VP of Smith Barney for 13 years, previously with Merrill Lynch and Edward D. Jones. With special training on managing discretionary portfolios Ralph concentrates on managing a variety of investment portfolios for both pre- and post-retirement individual investors, businesses and corporations. Series 7, 63 and 65, Life Accident and Health Insurance licenses held.</p>	
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	<p>Name: Gina Griffo Date of Birth: 4/14/69 Education: University of Rochester History: 10 years in the financial services industry holding Series 7, 63, 65, Life Accident and Health Insurance licenses. Gina Griffo is the Executive Vice President and Portfolio Manager of Ralph Parks Investment Group, LLC. Prior to accepting this position, Ms. Griffo was a Portfolio Management Associate at Smith Barney from 1998-November 2005. She was previously the Assistant Bursar for the University of Rochester.</p> <p>Name: Rajiv Dixit Date of Birth: 5/17/79 Education: MS in Information Technology from Rochester Institute of Technology & BS in Finance and Information Systems. History: Chief Operating Officer of Ralph Parks Investment Group LLC. 11/2005 – Present. Prior to joining Ralph Parks Investment Group, Rajiv was President and Director of Information Technology for Campus Ventures LLC. As a Director of Campus Ventures Rajiv developed and co-coordinated several Information Technology & financial research projects.</p> <p>RPIG manages a mutual fund, The Ralph Parks Cyclical Equity Fund, under a contract with the Fund dated June 1, 2006; Dale Driggs and Gregory Kuras of American Portfolio's offer the All-Cap Diversified Equity Growth Portfolio as Portfolio Management under agreements with RPIG to their clients.</p> <p>Certain RPIG employees act as broker-dealer representatives through Excel Securities. Under the supervision of Excel Securities RPIG registered brokers may execute non discretionary trades and receive commission based compensation through Excel Securities. (Any commission payments received are included in the calculation of the advisory fee for the client's account.)</p> <p>RPIG's policy is to consider the clients interest before personal interests. Employees of RPIG may execute transactions in their personal accounts in the same securities that are being executed in client accounts as long as there is not a perceived or potential conflict of interest. RPIG has adopted a Code of Ethics and Personal Trading Policy in compliance with Investment Advisers Act rule 204A-1. The Adviser requires all associated persons to adhere to the highest ethical standards; placing client interest before personal interest. RPIG requires access persons to report initial and annual holdings reports, quarterly transaction reports, and to pre-clear transactions in IPO's and private placements. In addition, the Adviser has outlined the sanctions for failing to comply with the Adviser's Policies and Procedures. The Code of Ethics is available upon request.</p> <p>Generally, there is a minimum account size of \$500,000. However, RPIG has the discretion to waive minimum balance requirements.</p> <p>A. RPIG reviews accounts on a portfolio level monthly, reviewing securities held in portfolios or considered for purchase weekly. Recommendations are documented and implemented by a principal of the firm. Performance information is not verified by a third party. It is calculated by Pershing on a uniform and consistent basis. Performance information is examined periodically by Mengel Metzger & Barr & Co. LLP, RPIG's accountant. Suitability reviews of client accounts are</p>	
Item 8. Other Affiliations		
Item 9 Participation or Interest in Client Transactions		
Item 10: Conditions for Managing Accounts		
Item 11: Account Review and Reporting		
Complete amended pages in full, circle amended items and file with execution page (page 1).		

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Item12: Brokerage Discretion	<p>made on a biennial basis at a minimum; Investment performance reports, provided by Pershing, are reviewed by the principals of the firm upon receipt and with the client periodically upon request.</p> <p>B. Pershing, as clearing agent, has custody of the assets and transmits trade confirmations to the client, Excel Securities, and RPIG for all transactions executed, monthly statements for each month in which there is activity, and statements of securities held in custody at least quarterly to clients. Pershing also provides clients with investment performance reports.”</p> <p>RPIG has full discretion over trading in client accounts. Under the supervision of Excel Securities RPIG registered brokers may execute non discretionary trades and receive commission based compensation through Excel Securities for brokerage accounts.</p> <p>Best Execution</p> <p>RPIG manages client portfolios on a discretionary basis and has a fiduciary responsibility when executing transactions for clients. RPIG executes securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances.</p> <p>The Firm has an obligation to obtain the “best execution” for its client(s) transactions. “Best execution” is defined as the most favorable, quality execution possible while considering the broker’s services, commissions charged, volume discounts offered, execution capability, reliability and responsiveness of the broker/dealer.</p> <p>The CCO or designee periodically tests and documents the execution quality for accounts over which RPIG has brokerage discretion. RPIG executes all trades through Excel Securities.</p> <p>Allocation</p> <p>RPIG allocates trades fairly and does not favor certain performance-based or other client accounts with "hot issues". The adviser will not aggregate transactions unless aggregation is consistent with its duty to seek best execution and the terms of the investment advisory agreement with each client for which trades are being aggregated. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all adviser’s transactions in that security on a given business day, with transaction costs shared pro-rata based on each client’s participation in the transaction. In addition, RPIG prohibits allocating profitable trades at each day's end, disproportionately favoring certain clients. RPIG does not manage a proprietary account in a favorable manner over client accounts.</p> <p>RPIG supervises the allocation of transaction costs and securities among clients’ accounts. The designated CCO reviews to ensure that RPIG is not unfairly favoring any client accounts.</p> <p>For blocked trades with partial fills, RPIG will allocate trades on a rotational basis.</p> <p>Cross Trading, Principal Trading, Soft Dollars</p> <p>RPIG does not engage in these activities.</p>	

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Item 13B-Client Referrals	<p>RPIG may enter into arrangements from time to time and with clients whereby RPIG agrees to reduce client fees when clients refer other clients to RPIG. The RPIG advisory fee charged to the client is not affected by the use of a third party in connection with the client's account(s), and the client will not be assessed any additional fees for the use of such services by RPIG. If the services of a third party are used in connection with the client's account, the structure of the arrangement and the compensation paid to the third party will be fully disclosed to the client pursuant to Rule 206(4) of the Investment Advisers Act of 1940 and all subsequent amendments thereto.</p> <p>Proxy Voting</p> <p>RPIG's voting history is available on request. As a matter of policy, RPIG monitors corporate actions, receives and votes client proxies and discloses any potential conflicts of interest, voting proxies for portfolio securities consistent with the best economic interests of its clients.</p> <p>Privacy Policy</p> <p>The adviser maintains high standards to safeguard nonpublic personal information at all times. The firm restricts access to personal information to those employees who need that information to provide you with our products and services. The Adviser maintains physical, electronic and procedural safeguards to insure the security of personal information.</p> <p>The Adviser does not disclose any nonpublic personal information about its current or former clients to anyone, except as permitted by law, and for the purpose of serving its clients' financial needs. The Adviser may, as necessary, disclose nonpublic personal information to certain third parties, such as brokers, to execute trades or to otherwise support your account(s) with us. Information may be disclosed to government agencies and regulatory organizations when required by law.</p> <p>We offer all our clients the opportunity to receive a fee discount credit for client referrals if the credit is mutually agreed among the parties.</p>	

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

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

OMB Number: 3235-0049
Expires: July 31, 2008
Estimated average burden
Hours per response... 9.402

Name of Investment Adviser:

Ralph Parks Investment Group. LLC

Address: (Number and Street)

(City)

(State)

(Zip Code)

Area Code: Telephone Number:

101 Sully's Trail Building 10**Pittsford****NY****14534****(585) 248-5700**

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

FORM ADV**Part II - Page 2**

Applicant:

Ralph Parks Investment Group LLC

SEC File Number:

801-65169

Date:

03/30/20091. **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 | 50% |
| <input checked="" type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services | 40% |
| <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 checked="" type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities | 10% |
| <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
<input checked="" type="checkbox"/>	<input 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 checked="" 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 checked="" type="checkbox"/> | C. | Investment companies | <input checked="" type="checkbox"/> | G. | Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> | D. | Pension and profit sharing plans | | | |

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

FORM ADV**Part II - Page 3**

Applicant:

Ralph Parks Investment Group, LLC

SEC File Number:

801- **65169**

Date:

03/30/2009**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Equity securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | I. Options contracts on: |
| <input type="checkbox"/> (3) foreign issues | <input checked="" type="checkbox"/> (1) securities |
| | <input checked="" type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | J. Futures contracts on: |
| <input checked="" 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 | K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input checked="" type="checkbox"/> (1) real estate |
| G. Investment company securities: | <input checked="" 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 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 checked="" 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 checked="" type="checkbox"/> Technical | |

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

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

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

FORM ADV**Part II - Page 4**

Applicant:

Ralph Parks Investment Group, LLC

SEC File Number:

801-65169

Date:

03/30/2009**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 checked="" 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.)

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

FORM ADV**Part II - Page 5**

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801- **65169**

Date:

03/30/2009**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.

See Schedule F

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

See Schedule F

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FORM ADV**Part II - Page 6**

Applicant:

Ralph Parks Investment Group, LLC

SEC File Number:

801-65169

Date:

03/30/2009**12. Investment or Brokerage Discretion.**

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

(1) securities to be bought or sold?

Yes ☒ No ☐

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

Yes ☒ No ☐

(3) broker or dealer to be used ?

Yes ☒ No ☐

(4) commission rates paid?

Yes ☒ No ☐

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

Yes ☒ No ☐

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

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

13. Additional Compensation.

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

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

Yes ☐ No ☒

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

Yes ☒ No ☐

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

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

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

Has applicant provided a Schedule G balance sheet?

Yes ☐ No ☒**Complete amended pages in full, circle amended items and file with execution page (page 1).**