

SEC File Number 801-65169

FORM ADV, Part II, Schedule H  
Investment Advisor Wrap Program Brochure

Ralph Parks Investment Group, LLC  
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Pittsford, NY 14534  
585-248-5700

All Cap Diversified Equity Portfolio (Fusion)  
The Managed Balanced Portfolio

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This brochure provides clients with information about Ralph Parks Investment Group, LLC and the Investment Management Services that should be considered along with ADV Parts I and II before becoming a client of Ralph Parks Investment Group LLC. This information has not been approved or verified by any government authority.

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## **About Ralph Parks Investment Group LLC**

Ralph Parks Investment Group, LLC (“the Adviser” or “Adviser”) offers portfolio management for the Managed Balanced Portfolio and the All Cap Diversified Equity Portfolio (Fusion). The Adviser is responsible for supervising the rendering of any investment advice that may be provided by its personnel. The Adviser also manages client accounts through other fee based services including financial planning and implementation (See Schedule F).

### **Fees**

The client is charged a single quarterly fee which includes the Adviser’s advisory, clearing and custody fee as well as the cost of all transactions executed through Excel Securities. The Adviser 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.

Excel securities 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. Excel Securities collects fees and pays the Adviser its portion.

The schedule below reflects fees charged by Excel Securities on behalf of the Adviser. Subsequent to Excel Securities deducting their own fees and other third party payments, Excel Securities remits the balance to the Adviser.

The fee schedule for Managed Balanced Portfolio and the All Cap Diversified Equity Portfolio (Fusion) is 1.50% (Flat Fee).

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 independent of the Adviser 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 the Adviser delivers to clients.

Certain Adviser employees may also act as broker-dealer representatives through Excel Securities. Under the supervision of Excel Securities Ralph Parks Investment Group’s registered brokers may execute non discretionary trades and receive commission based compensation through Excel Securities. Commission transaction are not allowed in the fees based accounts.

**Investment Adviser**  
**Methods of Analysis and Investment Strategy**

**All-Cap Diversified Equity Growth Portfolio - A.K.A. 'Fusion'**

The Fusion portfolio investment strategy focuses on the macro and micro analysis of U.S. financial markets. The Fusion portfolio is available only on a discretionary basis. The investment process in this portfolio can be best described as a two step process.

**Step 1 : Macro Market Analysis** - In this step the adviser determines the macro direction of the equity markets in the United States. Only if the macro direction test is positive i.e. adviser believes the current market trend is moving upwards, the investment process moves to the next step. Otherwise all assets in the portfolio remain in money market funds until the above scenario is attained.

**Step 2 : Micro Market Analysis:** - Once it is determined that the overall market trend is positive, the adviser uses an advanced technical configuration to determine what would be the best possible investment opportunity available in the market at that given time. Such strategies are selected from a group of 3,000 - 4,000 pre selected U.S. equity securities. Careful consideration is made towards reaching the goals of adequate diversification, liquidity and volume.

All investment decisions or judgments are made based on a 100% technical analysis strategy. At no point in time, personal judgment or fundamental views are employed. The technical strategies employed have been designed and back tested by the advisor and are proprietary.

**Investment Time Horizon : 3 - 5 Years**

**Risk Profile : Moderate - Aggressive**

**Tax Efficiency : Low**

**Managed Balanced Portfolio**

This strategy is designed for the investor who has a long term objective in income and or growth. Client individual needs are analyzed. Each portfolio is custom designed to meet client individual investment objectives based on their financial profile. Investments are made on both discretionary or non-discretionary basis. Investments in this type of account include but are not limited to stocks, mutual funds, exchange traded funds, bonds, preferred stocks and certificate of deposits. The Adviser conducts periodic reviews to ensure goals of adequate diversification, liquidity and income are being achieved.

**Investment Time Horizon : Based on individual needs**

**Risk Profile : Based on individual needs**

**Tax Efficiency : Based on individual needs**

## **Termination**

Clients who terminate during the quarter will receive a pro-rata reimbursement for pre-paid fees.

## **Education and Business Standards**

The Adviser requires that employees have significant investment experience prior to providing services, to its investment advisory clients. Generally, this translates to at least 2 years experience in a related financial services business or equivalent education.

## **Officers and Investment Committee**

Name: Ralph Parks  
Date of birth: 02/19/1938  
Education: B.S. Michigan State University  
MBA – Finance - Michigan State University  
History: President & C.E.O of Ralph Parks Investment Group & an  
Investment Broker for Excel Securities 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.

Name: Gina Griffo  
Date of Birth: 04/14/69  
Education: University of Rochester  
History: Executive Vice President of Ralph Parks Investment Group, LLC  
& an Investment Broker for Excel Securities 12/2005-present

12 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, Gina Griffo was a Portfolio Management Associate at Smith Barney from 1998-November 2005. She was previously an Assistant Bursar for the University of Rochester.

Name: Rajiv Dixit  
Date of Birth: 05/17/79  
Education: BS in Finance and Information Systems Rochester Institute of

## Technology

History: Chief Operating Officer of Ralph Parks Investment Group, LLC & an Investment Broker for Excel Securities 12/2005-present  
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. Series 7 & 66 licenses held.

## Other Financial Industrial Activities and Affiliations

The Adviser does not engage in cross trading, principal trading, and or in accepting soft dollars arrangements.

## Participation or Interest in Client Transactions

The Adviser 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. 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, the Adviser prohibits allocating profitable trades at each day's end, disproportionately favoring certain clients. The Adviser does not manage its proprietary account in a favorable manner over client accounts.

The Adviser supervises the allocation of transaction costs and securities among clients' accounts. The designated CCO reviews to ensure that the Adviser is not unfairly favoring any client accounts.

For blocked trades with partial fills, the Adviser will allocate trades on a pro-rata basis.

## Code of Ethics

The Adviser's policy is to consider the clients interest before personal interests. Employees of the Adviser 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. The Adviser 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. The Adviser 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.

### **Conditions for Managing Accounts**

Generally, there is a minimum account size of \$500,000. However, the Adviser has the discretion to waive minimum balance requirements.

### **Performance Reporting & Review of Accounts**

The Adviser reviews accounts for performance on a portfolio level monthly and reviews securities held in the portfolios 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, the Adviser's accountant. Suitability reviews of client accounts are made on a Bi-Annual 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.

Pershing, as clearing agent, has custody of the assets and transmits trade confirmations to the client, Excel Securities, and the Adviser 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.”

### **Investment or Brokerage Discretion**

The Adviser has full trading discretion over the All Cap Diversified Equity Portfolio (Fusion) and either discretionary or non-discretion trading over the Managed Wrap Portfolio depending on the terms of the Client Agreement.

### **Best Execution**

The Adviser manages client portfolios on both a discretionary and non-discretionary basis and has a fiduciary responsibility when executing transactions for clients. The Adviser 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.

The Adviser 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.

The CCO or designee periodically tests and documents the execution quality for accounts over which the Adviser manages. The Adviser executes all trades through Excel Securities.

**Privacy Policy**

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 clients with our products and services. The Adviser maintains physical, electronic and procedural safeguards to insure the security of personal information.

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 client account(s) with us. Information may be disclosed to government agencies and regulatory organizations when required by law.

**Proxy Voting**

The Adviser's exercises proxy votes on behalf of its discretionary clients. The Adviser's voting history is available on request. As a matter of policy, the Adviser monitors corporate actions, receives information and assists clients upon request regarding proxy votes. The advisor discloses any potential conflicts of interest, voting proxies for portfolio securities consistent with the best economic interests of its clients.