

Part II - Page 1

Name of Investment Adviser: Anvik Advisers LLC	
Address: (Number and Street) (City) (State) (Zip Code) 44 Wall Street, 15th Floor, New York, NY 10005-2297	Area Code: Telephone Number (212) 248-0750

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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(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.

Applicant:

Anvik Advisers LLC

SEC File Number:

801-

Date:

11/30/2007

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 checked="" type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services..... | <u>100</u> % |
| <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 the applicant call any of the services it checked above financial planning or some similar term? ☐ Yes ☒ No

C. Applicant offers investment advisory services for: (check all that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input checked="" type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input 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 | |

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 checked="" type="checkbox"/> A. Equity Securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | I. Options contracts on: |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input checked="" type="checkbox"/> (1) securities |
| <input checked="" type="checkbox"/> (3) foreign issues | <input 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 type="checkbox"/> (1) real estate |
| 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 checked="" type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input 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 checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the
Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

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

- | | |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input 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 | |

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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 checked="" 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 checked="" 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 Yes ☒ No ☐
and impose a minimum dollar value of assets or other conditions for starting or maintaining an account? ☒ ☐

(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 for details

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

See Schedule F for details

Applicant:

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

	Yes	No
B. Does applicant or a related person suggest brokers to clients?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

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

	Yes	No
Has applicant provided a Schedule G balance sheet?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:

Anvik Advisers LLC

SEC File Number:
801-67869

Date: 11/30/2007

(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:
Anvik Advisers LLC

IRS Empl. Ident. No.:
16-1771880

Item 1. A. (2)

Anvik Advisers LLC (the "Applicant") manages accounts for individuals, pension and profit-sharing plans, trusts and estates, and business entities for which it invests in equity securities and zero-coupon municipal and U.S. Treasury bonds, and engages in a "buy/write" option program of writing covered call options against equity securities in their portfolios. Applicant also invests client assets in interest-paying municipal, corporate and U.S. Treasury debt securities, and may purchase put options to offer some protection against price declines in the market or in a particular security (a "protective put"), or as part of a "collar" strategy when combined with a covered call option on the same underlying security. Applicant is also the investment adviser to Anvik Capital Partners, LP, a privately-offered investment partnership (the "Partnership"), for which it makes many of the same types of investments.

In connection with its management of client assets, Applicant seeks to maximize the client's returns, from both capital appreciation and income, primarily through the investment of the client's assets in common stocks that are, in Applicant's opinion, undervalued relative to their prospects for generating future earnings growth on a long-term basis or otherwise have prospects for future capital appreciation. Zero-coupon bonds and interest paying debt securities, and a call option writing program, are used to generate additional income for clients.

In connection with its portfolio investments, Applicant does not generally limit its investments to any specific market capitalization, and may invest in large-capitalization, mature companies, as well as small and mid-capitalization companies, in each case depending on Applicant's determinations regarding expected future appreciation. Applicant may also invest in exchange traded funds ("ETFs"), which are baskets of securities that are designed to generally track an index (such as the broad stock or bond market, an industry sector, or international securities), which trade on securities exchanges like individual stocks.

In the event that call options written in a client's account are exercised, the underlying security will be sold at the exercise price of the option, and commission expense will be incurred on the transaction. As a result, covered call writing activities could result in greater portfolio turnover and commission expense, and an increased recognition of gains or losses for tax purposes, than if a client invested in the underlying securities without the related option transactions. In addition, since put and call options by their nature are relatively short-term instruments, unlike the underlying securities which can be held indefinitely, options must either be exercised, bought or sold to close out the position, or, if they expire, a new position would have to be established if the position is to be continued. Each additional option transaction involves a separate brokerage commission, so that engaging in the related options transaction may increase the costs of engaging in the buy/write option program.

**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Anvik Advisers LLC

SEC File Number:
801-67869

Date: 11/30/2007

(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:
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FEE SCHEDULE

Applicant's fee for accounts held by individuals, pension and profit-sharing plans, trusts and estates and business entities is 0.95% annually of the net assets of the client's account based upon the value of the account as of the close of the previous calendar quarter. Such fee is payable quarterly in advance. For the first quarter in which a client's assets are subject to Applicant's management, the fee will be based upon the value of the client's account when it is first placed under management, and will be charged *pro rata* for the remaining balance of the quarter. Although not considered to be negotiable, such fee may be subject to negotiation in given situations based upon such factors as the size of the particular account, its relationship to other accounts managed by Applicant, and other factors deemed significant to Applicant.

In addition to the asset-based fee for client accounts as discussed above, and in an amount and under circumstances to be negotiated on a case-by-case basis with each client, Applicant may also receive a performance-based fee equal to a percentage of the profits earned in a client's account. Such performance-based fee, which would not exceed 20% of such profits, would only be charged to clients who satisfy the definition of "qualified clients" as defined under Rule 205-3 of the Investment Advisers Act of 1940, as amended, and California Code of Regulations Section 260.234 and Section 260.234 of the Illinois Securities Law of 1953.

Pursuant to Rule 205-3 of the Investment Advisers Act, a "qualified client" is defined as follows:

(i) A natural person who or a company that immediately after entering into the contract has at least \$750,000 under the management of the investment adviser;

(ii) A natural person who or a company that the investment adviser entering into the contract (and any person acting on his behalf) reasonably believes, immediately prior to entering into the contract, either:

(A) Has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$1,500,000 at the time the contract is entered into; or

(B) Is a qualified purchaser as defined in section 2(a)(51)(A) of the Investment Company Act of 1940 (15 U.S.C. 80a-2(a)(51)(A)) at the time the contract is entered into; or

(iii) A natural person who immediately prior to entering into the contract is:

(A) An executive officer, director, trustee, general partner, or person serving in a similar capacity, of the investment adviser; or

**Schedule F of
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Continuation Sheet for Form ADV Part II

Applicant:

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(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:
Anvik Advisers LLC

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(B) An employee of the investment adviser (other than an employee performing solely clerical, secretarial or administrative functions with regard to the investment adviser) who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar functions or duties for or on behalf of another company for at least 12 months.

Applicant's management fee for the Partnership is 2.00% per annum of the net assets of the Partnership, payable quarterly in advance. Lower fees for services comparable to the Applicant's may be available from other sources.

Applicant will provide a *pro rata* refund of any fee paid in advance if a client's account is terminated prior to the end of a calendar quarter. Except for the first quarter during which an account is managed (for which a *pro rata* fee is charged for the period for which the account is managed), no fees will be charged on assets added to an account during a quarter until the start of the following quarter, and no refund will be given for partial withdrawals from an account during a quarter.

Investment Management Agreements entered into between clients and Applicant will continue in effect until terminated by either the client or Applicant by one party giving notice to the other in writing at least seven (7) days prior to the date of termination (the "Termination Date"). Effective with the Termination Date, Applicant will refrain, without liability, from taking any further action with respect to the client's account, and Applicant will cease to be entitled to receive advisory fees for any period following the Termination Date. If an Investment Management Agreement is terminated after fees have been collected in advance for a given period, a *pro rata* refund of such fees will be paid to the client for that period.

Clients may also terminate Investment Management Agreements with Applicant, without penalty, within five (5) business days after the date of execution, provided, however, that any investment action taken by Applicant with respect to the client's account prior to the effective date of such termination, shall be at the client's risk.

Item 2. G.

Applicant provides investment advice to a limited partnership as described in Item 1.A. above.

Item 5.

At a minimum, advisory personnel associated with Applicant must possess the following: A college degree and/or appropriate business experience and all required licenses.

**Schedule F of
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Continuation Sheet for Form ADV Part II

Applicant:

Anvik Advisers LLC

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Date: 11/30/2007

(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:
Anvik Advisers LLC

IRS Empl. Ident. No.:
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Item 6.

The following individuals are the managing members of Applicant. Mr. McLaughlin is primarily responsible for the general investment management services provided to clients and to the investment partnership managed by Applicant.

JAMES C. MCLAUGHLIN, Date of Birth: 05/30/1952

Graduated from the University of Montana in 1974 with a Bachelor of Science Degree in biology and physics, and graduated from Boston College in 1976 with a Masters of Business Administration Degree in Finance. Mr. McLaughlin has been employed with McLaughlin, Piven, Vogel Securities, Inc., an SEC-registered broker-dealer and an investment adviser registered with the State of New York, since 1977, and is currently Chairman of the Board of Directors. He is also an officer of MPV Insurance (Agency), Inc.

ALLAN M. VOGEL, Date of Birth: 07/07/1941

Graduated from Brooklyn College in 1963 with a Bachelor of Science Degree in Accounting. Mr. Vogel was one of the founders of McLaughlin, Piven, Vogel Securities, Inc. in 1977, then joined Rooney, Pace Inc. in 1981, and rejoined McLaughlin, Piven, Vogel Securities, Inc. in 1982 where he has been employed since 1982. He is currently President, Secretary and Director of McLaughlin, Piven, Vogel Securities, Inc. He is also an officer of MPV Insurance (Agency), Inc.

EDWARD T. BRIENZA, Date of Birth: 01/03/1955

Mr. Brienza has been employed by McLaughlin, Piven, Vogel Securities, Inc. since 1982 and is currently Senior Vice President, Options Manager, and a Branch Manager.

Item 7. C.

James C. McLaughlin, Allan M. Vogel and Edward T. Brienza are officers of McLaughlin, Piven, Vogel Securities, Inc. and Messrs. McLaughlin and Vogel are officers of MPV Insurance (Agency), Inc. The

majority of their time is spent in such capacities, but much of their work in connection with McLaughlin, Piven, Vogel Securities, Inc. is also applicable to their duties on behalf of Applicant.

Item 8. C. (1)

The managing members of Applicant are officers of McLaughlin, Piven, Vogel Securities, Inc., a broker-dealer that is registered with the SEC and is a member of the Financial Industry Regulatory Authority ("FINRA"). It is anticipated that virtually all clients of Applicant will

**Schedule F of
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Continuation Sheet for Form ADV Part II

Applicant:

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maintain brokerage accounts with McLaughlin, Piven, Vogel Securities, Inc., which, along with its clearing agent, Ridge Clearing & Outsourcing Solutions, Inc., will execute most securities transactions for such accounts.

Item 8. D.

James C. McLaughlin and Allan M. Vogel are managing members of Anvik GP LLC, the General Partner of the Partnership, a privately-offered investment partnership which invests in equity securities, zero-coupon municipal and U.S. Treasury bonds, writes call options against equity securities in its portfolio and engages in other options transactions.

Item 9. Code of Ethics

Applicant has adopted a Code of Ethics which sets forth the standards of conduct expected of its associated persons, and which addresses the conflicts that can arise from personal trading by them. The Code of Ethics requires that accounts of associated persons must generally be opened at McLaughlin, Piven, Vogel Securities, Inc., and requires pre-approval of transactions that are not to be executed as part of a bunched order on behalf of both clients and associated persons. The Code of Ethics also requires periodic reporting by such persons through duplicate copies of confirmations and account statements or otherwise, so that Applicant can monitor such persons' trading to prevent any violations of the Code of Ethics or other conflicts of interest which could result from employee trading. A copy of the Code of Ethics will be provided to clients or prospective clients upon request.

The managing members of Applicant, and other associated persons thereof, may buy or sell securities identical to those recommended to clients for their personal accounts. Although any of such persons may engage in the same or similar transactions as those effected for clients, it is the policy of Applicant that no person employed by Applicant may purchase or sell any security prior to a known transaction(s) being implemented for an advisory account.

It is Applicant's policy to treat all client accounts fairly and equitably, and Applicant does not favor one group of client accounts over any other. In order to handle transactions for all of its clients in the most cost effective and fairest manner possible, Applicant may bunch orders to get a better price for the particular security for those client accounts who, Applicant believes, are suitable for such transaction. In other words, rather than effecting multiple transactions in the same security, i.e., one for each client account, Applicant would buy or sell one or more larger blocks of the security in question and allocate the transactions among the appropriate designated accounts. All clients whose accounts are included in the bunched order will pay or receive the average price obtained with respect to the entire order.

Item 9.B.

The managing members of Applicant are also officers and principals of McLaughlin, Piven, Vogel Securities, Inc., which, along with its clearing agent, Ridge Clearing & Outsourcing

**Schedule F of
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Continuation Sheet for Form ADV Part II

Applicant:

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Solutions, Inc., will effect securities transactions for clients of Applicant in its capacity as a registered broker-dealer. McLaughlin, Piven, Vogel Securities, Inc. also effects securities transactions for the Partnership, and may also participate in the offer of limited partnership interests in the Partnership to investors. When acting as a broker in effecting transactions for clients of Applicant, McLaughlin, Piven, Vogel Securities, Inc. will charge a commission in such transactions.

Item 9. E.

Applicant's associated persons are not prohibited from buying, selling or holding securities that have been bought or sold for client accounts. As a result, if associated persons wish to buy or sell the same securities at the same time as they are being bought or sold for clients, such employees' orders may be withheld until completion of client orders or may be included in a bunched order being placed for both clients and such associated persons. If the entire order can be filled on the day the order is placed, all participants in that order, including both clients and Applicant's associated persons, will receive or pay the average price obtained in filling that order.

However, if the entire order cannot be filled on the same day, Applicant's policy is as follows:

(1) First, all associated persons will be eliminated in order to determine whether all client orders can be satisfied with the portion of the order that was filled.

(2) Second, if the quantity filled is still insufficient to satisfy all of the client orders after elimination of the associated persons' orders, Applicant will allocate the amount filled on a *pro rata* basis based upon the amount of the order that was intended to be bought or sold for each client account (e.g., if only 60% of an order was filled, each account would receive 60% of the amount originally intended for such account). In making such *pro rata* allocations, however, accounts that would otherwise receive an odd lot allocation may be rounded up to a round lot.

(3) If an order cannot be completely filled on a single trading day, it is Applicant's policy to cancel the balance of the order. Depending upon the market in that security on the following trading day(s), an order may be placed for the balance of the order on another day, with allocations to be made among the accounts in a manner that will fill, as nearly as possible under the circumstances, the original amounts intended for each of the clients' accounts. Orders for associated persons which had been eliminated in the previous allocation may be included with such later orders if inclusion of those orders will not prevent the filling of client orders.

Item 10.

Applicant normally requires a minimum account size of \$250,000 in separately managed accounts, and the investment partnership it advises normally requires a minimum investment

**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Anvik Advisers LLC

SEC File Number:
801-67869

Date: 11/30/2007

(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:
Anvik Advisers LLC

IRS Empl. Ident. No.:
16-1771880

of \$500,000. Such minimums may be waived based on various factors, such as the relationship of the account to other accounts, present or potential clients or other factors deemed significant by Applicant.

Item 11. A.

Applicant conducts the following reviews with respect to client accounts:

On the day following the trade date for any client transactions, Applicant's operations and/or compliance personnel review trade reports to ensure that each transaction was properly executed and correctly reported by the executing broker-dealer.

Applicant's managing members, James McLaughlin, Allan Vogel and Edward Brienza, normally meet on a monthly basis, and more often as needed, to review the fundamentals and performance of all securities held in clients' accounts to determine whether any changes should be made to such holdings.

In addition, on a regular basis, but not less frequently than quarterly, the managing members of Applicant review all accounts on an individual basis to consider the particular account's portfolio holdings, performance and adherence to the account's investment objectives and any limitations or restrictions. Account reviews also occur as a result of (a) client requests, (b) changes in a client's personal or financial condition when Applicant is advised of such changes, (c) changes in tax laws or in economic factors that would affect a client's financial position, or (d) special circumstances such as a significant change in the market place. All reviews are made with a view toward long-term preservation of capital, risk exposure and compliance with account trading guidelines, limitations or restrictions.

Item 11. B.

Applicant provides clients with monthly reports of investment activity.

Item 12. A.

Although Applicant will normally have full discretionary authority to make investments on behalf of the individual accounts it manages, clients may impose upon Applicant reasonable restrictions or constraints on the way their account will be managed. There are no limitations on the discretionary authority of Applicant to determine the type or amount of securities to be bought or sold for the Partnership.

Applicant has complete authority to select the broker-dealers who will execute securities transactions on behalf of the Partnership. Applicant intends to select those executing broker-dealers, which may include McLaughlin, Piven, Vogel Securities, Inc. and its clearing agent, Ridge Clearing & Outsourcing Solutions, Inc., that will provide best execution services to the Partnership. Applicant will base its selection of executing broker-dealers upon such factors as

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the depth of the market for the security involved in the transaction, the price of the security, the financial condition, market expertise and execution capability of the broker-dealer, the reasonableness of the commissions and its periodic assessments of execution costs and quality. Applicant may also consider the value of any research or other services eligible for the safe harbor provided by Section 28(e) of the Securities Exchange Act of 1934, as amended, that have been provided to or purchased for the Applicant by any such executing broker. The brokerage commissions paid by the Partnership may not reflect the lowest rates available. Rather, the services received and the cost of such services reflect Applicant's assessment of execution cost and quality. Other than the services described above, Applicant will not receive, directly or indirectly, any compensation in connection with the execution of brokerage orders on behalf of the Partnership.

It is expected that virtually all transactions for the separate accounts managed by Applicant will be effected through McLaughlin, Piven, Vogel Securities, Inc. and Ridge Clearing & Outsourcing Solutions, Inc. In determining to use McLaughlin, Piven, Vogel Securities, Inc. and Ridge Clearing & Outsourcing Solutions, Inc., Applicant has considered numerous factors relating to such firms' execution capabilities, costs and execution quality that warrant their use for such executions. The brokerage commissions paid by such accounts may not reflect the lowest rates available.

It is anticipated that, where Applicant purchases or sells a security on behalf of more than one advisory client, Applicant may place such orders in a bunched order for all such clients and allocate the executions among the clients on an average price basis. To the extent that such orders are not executed in full on a particular trading day, the executions would be allocated to advisory clients in an equitable manner, normally *pro rata* among the clients who were intended to participate in the order. The unfilled balance of the order may be filled in succeeding trading days. Applicant will periodically review such allocations to monitor whether its allocation methodologies are consistently achieving equitable results. Please see Item 9.E. above for a further description of Applicant's policies and procedures relating to the execution and allocation of bunched orders.

Item 13. B.

Applicant may enter into arrangements and make payments to third parties for client referrals as permitted under Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended, but has no such arrangements in effect at the present time.

Miscellaneous

Generally, Applicant does not vote proxies for securities held in clients' accounts. However, Applicant will vote proxies for securities held in accounts of clients that are subject to ERISA, unless the fiduciary for such client retains the right to vote such proxies.