

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

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Name of Investment Adviser:

**EI Adli Investment Advisors**

Address: (Number and Street)

(City)

(State)

(Zip Code)

Area Code: Telephone Number:

**1 Amber Sky Drive****Rancho Palos Verdes****CA****90275****( 310 ) 377-4322**

**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.**

**Table of Contents**

<b><u>Item Number</u></b>	<b><u>Item</u></b>	<b><u>Page</u></b>
1	Advisory Services and Fees . . . . .	2
2	Types of Clients . . . . .	2
3	Types of Investments . . . . .	3
4	Methods of Analysis, Sources of Information and Investment Strategies . . . . .	3
5	Education and Business Standards . . . . .	4
6	Education and Business Background . . . . .	4
7	Other Business Activities . . . . .	4
8	Other Financial Industry Activities or Affiliations . . . . .	4
9	Participation or Interest in Client Transactions . . . . .	5
10	Conditions for Managing Accounts . . . . .	5
11	Review of Accounts . . . . .	5
12	Investment or Brokerage Discretion . . . . .	6
13	Additional Compensation . . . . .	6
14	Balance Sheet . . . . .	6
	Continuation Sheet . . . . .	Schedule F
	Balance Sheet, if required. . . . .	Schedule G

(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.**

**FORM ADV****Part II - Page 2**

Applicant:

**EI Adli Investment Advisors**

SEC File Number:

801-n/a

Date:

**04/23/2008****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 .....  | <u>100</u> % |
| <input type="checkbox"/>            | (2) | Manages investment advisory accounts not involving investment supervisory services .....  | ___%         |
| <input type="checkbox"/>            | (3) | Furnishes investment advice through consultations not included in either service described above .....  | ___%         |
| <input type="checkbox"/>            | (4) | Issues periodicals about securities by subscription .....   | ___%         |
| <input type="checkbox"/>            | (5) | Issues special reports about securities not included in any service described above .....   | ___%         |
| <input type="checkbox"/>            | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities ..... | ___%         |
| <input type="checkbox"/>            | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities .....   | ___%         |
| <input type="checkbox"/>            | (8) | Provides a timing service .....   | ___%         |
| <input type="checkbox"/>            | (9) | Furnishes advice about securities in any manner not described above .....   | ___%         |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

**B.** Does applicant call any of the services it checked above financial planning or some similar term? .....Yes No  
☐ ☒**C.** Applicant offers investment advisory services for: (check all that apply)

- |   |   |
|---|---|
| <input 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 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 |  |

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

**FORM ADV****Part II - Page 3**

Applicant:

**EI Adli Investment Advisors**

SEC File Number:

801- n/a

Date:

**04/23/2008****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 checked="" type="checkbox"/> (3) foreign issues  | <input checked="" type="checkbox"/> (1) securities                         |
|   | <input type="checkbox"/> (2) commodities                                   |
| <input checked="" type="checkbox"/> B. Warrants   | J. Futures contracts on:   |
|   | <input type="checkbox"/> (1) tangibles                                     |
| <input checked="" type="checkbox"/> C. Corporate debt securities<br>(other than commercial paper) | <input type="checkbox"/> (2) intangibles                                   |
| <input checked="" type="checkbox"/> D. Commercial paper   | K. Interests in partnerships investing in:                                 |
| <input checked="" type="checkbox"/> E. Certificates of deposit                                    | <input checked="" type="checkbox"/> (1) real estate                        |
| <input checked="" type="checkbox"/> F. Municipal securities                                       | <input checked="" type="checkbox"/> (2) oil and gas interests              |
|   | <input type="checkbox"/> (3) other (explain on Schedule F)                 |
| G. Investment company securities:   | <input checked="" type="checkbox"/> L. Other (explain on Schedule F)       |
| <input checked="" type="checkbox"/> (1) variable life insurance                                   |  |
| <input checked="" type="checkbox"/> (2) variable annuities  |  |
| <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 checked="" 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<br>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<br>(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered<br>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  |   |

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

**FORM ADV****Part II - Page 4**

Applicant:

**EI Adli Investment Advisors**

SEC File Number:

**801-n/a**

Date:

**04/23/2008****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 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.)

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

**FORM ADV****Part II - Page 5**

Applicant:

**EI Adli Investment Advisors**

SEC File Number:

801- n/a

Date:

**04/23/2008****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
<input checked="" type="checkbox"/>	<input type="checkbox"/>

(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.

**Please refer to Schedule F, Item 11. A.**

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

**Please refer to Schedule F, Item 11. B.**

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

Applicant:

EI Adli Investment Advisors

SEC File Number:

801-n/a

Date:

04/23/2008

**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

☐ ☒

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>El Adli Investment Advisors</b>	801- n/a	<b>04/23/2008</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>El Adli, Fouad</b>		IRS Empl. Ident.No.: <b>AVAILABLE UPON REQUEST</b>
Item of Form (identify)	Answer	
Item 1.D.	<p><b>Advisory Services and Fees</b></p> <p>El Adli, Fouad, d/b/a El Adli Investment Advisors (hereinafter "Mr. El Adli" or the "Adviser") offers personalized investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. Individuals associated with the Adviser will provide its investment advisory services. These individuals are appropriately licensed, qualified, and/or authorized to provide advisory services on behalf of the Adviser. Such individuals are known as Investment Adviser Representatives (IARs).</p> <p>The Adviser is a sole proprietorship registered with the State of California as an investment adviser. This Schedule F narrative provides clients with information regarding the Adviser and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory client of the Adviser.</p> <p>Please contact Fouad El Adli, Sole Proprietor/Chief Compliance Officer, if you have any questions about this Schedule F narrative. Additional information about the Adviser is available on the Internet at "www.adviserinfo.sec.gov". You can search this site by a unique identifying number, known as a CRD number. The CRD number for the Adviser is 144007.</p> <p><b>Portfolio Management Services</b></p> <p>Mr. El Adli provides continuous discretionary and non-discretionary asset management and investment advisory services. Subject to any written guidelines, which the client may provide, the Adviser will be granted discretion and authority to manage the account. Accordingly, the Adviser is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include making all investment decisions on the (a) securities purchased/sold; (b) the amount of securities to be purchased/sold; (c) selection of the broker or dealer to execute the transaction(s), and (d) the commission rates to be paid. Once the portfolio is constructed, the Adviser provides ongoing supervision and re-balancing of the portfolio as changes in market conditions and client circumstances may require. Where the Adviser enters into non-discretionary arrangements with clients, Mr. El Adli will obtain client approval prior to the execution of a trade.</p> <p>The annual fee for portfolio management services is billed quarterly in advance based on the market value of client assets on the last day of the preceding quarter. Fees will be assessed pro rata in the event the portfolio management agreement is executed at any time other than the first day of a calendar quarter. On an annualized basis, the Adviser's fee for ongoing portfolio management services, subject to negotiation, will range from 1% to 2% of assets under management. The final fees will be clearly set forth in the agreement for services signed by the Adviser and the client.</p> <p>Mr. El Adli generally imposes a minimum of \$500,000 to open and maintain an advisory account. However, this account minimum may be waived at the Adviser's discretion. In limited circumstances, the Adviser may allow accounts of members of the same household to be aggregated for purposes of meeting the minimum account size. The Adviser may allow such aggregation, for example, where it services accounts on behalf of minor children of current clients, individual and joint accounts for a spouse, and other types of related accounts.</p> <p>Payment for management fees will be made by the qualified custodian holding the client's funds and securities provided the client provides written authorization permitting the fees to</p>	

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>EI Adli Investment Advisors</b>	801- n/a	<b>04/23/2008</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>EI Adli, Fouad</b>		IRS Empl. Ident.No.: <b>AVAILABLE UPON REQUEST</b>
Item of Form (identify)	Answer	
Item 1.D. (continued)	<p>be paid directly from their account. The Adviser will not have access to client funds for payment of fees without client consent in writing. Further, the qualified custodian agrees to deliver an account statement, on at least a quarterly basis directly to the client showing all disbursements from the account. The client is encouraged to review their account statements for accuracy. The Adviser will receive a duplicate copy of the statement that was delivered to the client.</p> <p>The Adviser or the client may terminate the management agreement within five days of the date of acceptance without penalty to the client. After the five-day period, either party, upon 30 business days' written notice to the other, may terminate the management agreement. The management fee will be pro-rated for the quarter in which the cancellation notice was given and any unearned fees will be returned to the client.</p> <p><b>General Information on Advisory Services and Fees</b> The Adviser shall never have custody of any client funds or securities, as the services of an independently qualified custodian will be used for these asset management services.</p> <p>The fees charged are calculated as described above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory client (15 U.S.C. §80b-5(a)(1)).</p> <p>The Adviser does not represent, warrant, or imply that the services or methods of analysis used by the Adviser can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections.</p> <p>Advice offered by the Adviser may involve investments in mutual funds. Clients are hereby advised that all fees paid to the Adviser for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, there may be transaction charges involved with the purchasing or selling of securities. The Adviser does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the client funds or securities. The client should review all fees charged by mutual funds, the Adviser, and others to fully understand the total amount of fees to be paid by the client.</p>	
Item 3.L.	<p><b>Types of Investments</b> The Adviser's investment strategy generally focuses on investments in biotechnology stocks and municipal securities. The Adviser may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship and will explore other investment options at the client's request. Additionally, the Adviser reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives.</p>	
Item 6.	<p><b>Education and Business Background</b> <b>Fouad EI Adli</b> <i>Year of Birth:</i> 1947 <i>Formal Education After High School:</i></p> <ul style="list-style-type: none"> <li>• University of California, Los Angeles, PhD, Molecular Biology, 1977.</li> <li>• University of California, Los Angeles, Masters, Molecular Biology, 1974.</li> <li>• University of California, Los Angeles, B.S., Biology, 1973.</li> </ul>	

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



**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>El Adli Investment Advisors</b>	801- n/a	<b>04/23/2008</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>El Adli, Fouad</b>		IRS Empl. Ident.No.: <b>AVAILABLE UPON REQUEST</b>
Item of Form (identify)	Answer	
Item 7. A. Item 7. B. Item 13. A.	<p><b>Business Background for the Previous Five Years:</b></p> <ul style="list-style-type: none"> <li>• El Adli Investment Advisors, Sole Proprietor, 04/2007 to Present.</li> <li>• Wachovia Securities, LLC, Registered Representative, 07/2003 to 05/2007.</li> <li>• Prudential Securities Incorporated, Registered Representative, 09/2000 to 07/2003.</li> </ul> <p><b>Other Business Activities</b> Fouad El Adli, Sole Proprietor/CCO is also registered as an insurance agent. As such, Mr. El Adli may occasionally sell insurance products, including, but not limited to, life, health, and long-term care products, for additional and separate compensation, in the form of commissions.</p>	
Item 9. E.	<p><b>Participation or Interest in Client Transactions</b> The Adviser or individuals associated with the Adviser may buy or sell – for their personal account(s) - investment products identical to those recommended to clients. It is the expressed policy of the Adviser that employees shall not have priority in any purchase or sale over clients' accounts. <sup>(1)(2)</sup></p> <p>The Adviser has adopted a Code of Ethics, the full text of which is available to clients and prospective clients upon request. The Adviser has several goals in adopting this Code. The Adviser desires to comply with all applicable laws and regulations governing its practice, and the management of the Adviser has determined to set forth guidelines for professional standards, under which all associated persons of the Adviser are to conduct themselves. The Adviser has set high standards, the intention of which is to protect client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith and fair dealing with clients. All associated persons are expected to adhere strictly to these guidelines, as well as the procedures for approval and reporting established in the Code of Ethics primarily related to personal securities transactions, and violations of the Code. In addition, the Adviser maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Adviser or any person associated with the Adviser.</p> <p>Footnotes:</p> <p>(1) This investment policy has been established recognizing that some securities being considered for purchase and/or sale on behalf of the Adviser's Clients trade in sufficiently broad markets to permit transactions by Clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with the Adviser's records in the manner set forth above.</p> <p>(2) The foregoing does not apply to certain types of securities, such as obligations of the U.S. Government, and shares in open-end mutual funds. Open-end mutual funds are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds by Advisory Representatives are not likely to have an impact on the prices of the fund shares in which Clients invest.</p>	
Item 10.	<p><b>Conditions for Managing Accounts</b> The Adviser generally imposes a minimum of \$500,000 to open and maintain an advisory account. However, this account minimum may be waived at the discretion of the Adviser if, for example, the client appears to have significant potential for increasing assets under management. Also in its discretion, the Adviser may household client accounts to meet the stated minimum.</p>	
Item 11.A. Item 11.B.	<p><b>Review of Accounts/Reports to Clients</b> Fouad El Adli, Sole Proprietor/Chief Compliance Officer, will monitor client accounts on a</p>	

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>El Adli Investment Advisors</b>	801- n/a	<b>04/23/2008</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>El Adli, Fouad</b>		IRS Empl. Ident.No.: <b>AVAILABLE UPON REQUEST</b>
Item of Form (identify)	Answer	
Item 12. A.	<p>continuous basis to ensure the advisory services provided to the client are consistent with the client's investment needs and objectives. The Adviser will offer clients a formal account review on an annual basis or more often upon request from the client. Triggering factors that may stimulate a review include, but are not limited to, significant market corrections, large deposits or withdrawals from an account and the client's request for an additional review. Clients will receive reports, at least quarterly, from the custodian holding their funds and securities.</p> <p><b>Investment or Brokerage Discretion</b> Generally, clients grant the Adviser complete discretion over the selection and amount of securities to be purchased or sold, the broker/dealer to be used and the commission rates to be paid for their account without obtaining their prior consent or approval. However, the Adviser's investment authority may be subject to specified investment objectives, guidelines and/or conditions imposed by the client. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio, restrictions or prohibitions of transactions in the securities of a specific industry, and/or directed brokerage. Where the Adviser enters into non-discretionary arrangements with clients, Mr. El Adli will obtain client approval prior to the execution of a trade.</p>	
Item 12.B. Item 13.A.	<p><b>Suggestion of Brokers/ Additional Compensation</b> The Adviser may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab &amp; Co., Inc. ("Schwab Institutional"), a registered broker-dealer, to maintain custody of clients' assets and to effect trades for their accounts. The Adviser and Schwab Institutional are separate, unaffiliated entities. Schwab Institutional provides the Adviser with access to its institutional trading and operations services typically not available to Schwab's retail customers. These services generally are available to independent investment advisory firms at no charge to them so long as a total of at least \$10 million of the advisor's clients' account assets are maintained at Schwab Institutional. Schwab Institutional's services include brokerage, custody, research, access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. Schwab Institutional also makes available to the Adviser other products and services that benefit the Adviser. Some of these other products and services assist the Adviser in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as balances, positions and transactions, as well as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of the Adviser's fees from its clients' accounts, and assist with back-office support, record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of the Adviser's accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional may also provide the Adviser with other services intended to help the Adviser manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing.</p> <p>Schwab Institutional also provides various products, services and other benefits to the Adviser at no cost or a reduced cost based upon the Adviser's commitment that the Adviser's clients will place or maintain a specified dollar amount of assets in accounts with Schwab Institutional within a specified period of time. The Adviser may be influenced by this</p>	

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>EI Adli Investment Advisors</b>	801- n/a	<b>04/23/2008</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>EI Adli, Fouad</b>		IRS Empl. Ident.No.: <b>AVAILABLE UPON REQUEST</b>
Item of Form (identify)	Answer	
Item 13. A. (continued)	<p>commitment in recommending or requiring that clients' establish brokerage accounts at Schwab Institutional.</p> <p>The products and services or other benefits provided by Schwab Institutional include payments offsetting the fees otherwise payable by the Adviser for compliance consulting services provided by experienced industry professionals.</p> <p>Some of the products, services and other benefits provided by Schwab Institutional benefit the Adviser but may not benefit the Adviser's clients' accounts. The Adviser's recommendation that a client place assets in Schwab's custody may be based in part on benefits Schwab provides to the Adviser, and not solely on the nature, cost or quality of custody and execution services provided by Schwab.</p> <p><i>Directed Brokerage</i> In limited circumstances and in the Adviser's discretion, some clients may instruct the Adviser to use one or more particular brokers for the transactions in their accounts. Clients who may want to direct the Adviser to use a particular broker should understand that this may prevent the Adviser from effectively negotiating brokerage compensation on their behalf and may also prevent the Adviser from obtaining the most favorable net price and execution. Moreover, clients that direct brokerage may incur additional costs for performance reporting. Thus, when directing brokerage business, clients should consider whether the commission expenses and execution, clearance and settlement capabilities that they will obtain through their broker are adequately favorable in comparison to those that the Adviser would otherwise obtain for its clients.</p> <p><b>Miscellaneous</b> <i>Proxy Voting</i> The Adviser will not vote proxies on behalf of client accounts. Although, at the client's request the Adviser may offer clients advice regarding corporate actions and the exercise of proxy voting rights.</p> <p><i>Aggregation of Trades</i> The Adviser may aggregate orders with respect to a security for advisory client accounts if such aggregation is consistent with achieving best execution for the various client accounts. When orders are aggregated, each participating account receives the weighted average share price for all transactions in a particular security effected to fill such orders at the time of execution and transaction costs are shared pro rata based upon each accounts participation in the transaction. However, smaller clients may bear higher charges if they fail to meet the minimum account sizes set by the broker. Allocations of orders among client accounts must be made in a fair and equitable manner.</p> <p><i>Class Action Lawsuits</i> From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. The Adviser has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. It also has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, the Adviser has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct, or negligence by corporate management of issuers whose securities are held by clients.</p>	

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

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>El Adli Investment Advisors</b>	801- n/a	<b>04/23/2008</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>El Adli, Fouad</b>		IRS Empl. Ident.No.: <b>AVAILABLE UPON REQUEST</b>
Item of Form (identify)	Answer	
	<p>Where the Adviser receives written or electronic notice of a class action lawsuit, settlement, or verdict affecting securities owned by a client, it will forward all notices, proof of claim forms, and other materials, to the client. Electronic mail is acceptable where appropriate if the client has authorized contact in this manner.</p> <p><i>Confidentiality</i></p> <p>Mr. El Adli views protecting his customers' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, the Adviser has instituted policies and procedures to ensure that customer information is kept private and secure.</p> <p>The Adviser does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, the Adviser may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants and lawyers.</p> <p>The Adviser restricts internal access to nonpublic personal information about its clients to those employees who need to know that information in order to provide products or services to the client. The Adviser maintains physical and procedural safeguards that comply with federal standards to guard a client's nonpublic personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be the Adviser's policy never to sell information about current or former customers or their accounts to anyone. It is also the Adviser's policy not to share information unless required to process a transaction, at the request of the Adviser's customer, or as required by law.</p> <p>A copy of the Adviser's privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the advisory agreement. Thereafter, the Adviser will deliver a copy of the current privacy policy notice to its clients on an annual basis. If you have any questions on this policy, please contact Fouad El Adli, Sole Proprietor, at (310) 377-4322.</p>	

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