

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

CuttingEdge Advisors

**13230 Tesson Ferry Road
Saint Louis, MO 63128**

Phone: (314) 919-2024

Fax: (314) 919-2096

This brochure provides information about the qualifications and business practices of CuttingEdge Advisors (“CuttingEdge”).

If you have any questions about the content of this brochure, please contact Norman Meyer, President, who is responsible for CuttingEdge’s legal and regulatory requirements, at the phone numbers listed above or by e-mail at nmeyer@cuttingedgeadvisors.com.

Additional SEC disclosures can be found in Part 1 of Form ADV, which can be located on the Internet through www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for CuttingEdge is 146371.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

This brochure was updated on March 1, 2016.

Thank you,

Norman Meyer
President
CuttingEdge Advisors

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

Material Changes Since Our Last SEC Disclosure Filing

Since the date of the filing of the previous version of this Form ADV, Part II document with the U.S. Securities and Exchange Commission (“SEC”), we have modified this SEC Disclosure Document, also called the Form ADV, Part II narrative (and herein referred to as the “brochure.”) Only the material changes since the last update of this brochure are set forth on this page. These material changes include:

1. Assets under Management. The amount of our Assets under Management have materially increased since our last Form ADV, Part II filing.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)**TABLE OF CONTENTS**

A. About CuttingEdge Advisors, Generally	Page 5
Our Firm’s History	
Amount of Assets Upon Which Investment Management is Provided	
B. CuttingEdge’s Investment Philosophies and Strategies	Pages 6 - 8
Generally	
Methods of Analysis	
Sources of Information	
Types of Investments	
Risk of Loss, Generally	
Risk of Loss, Certain Higher-Risk Securities	
Cash Balances in Client Accounts	
Account Reviews	
Reports on Client Accounts	
C. CuttingEdge’s Advisory Programs, Generally	Pages 9 - 14
CuttingEdge’s Asset Management Program	
CuttingEdge’s Third Party Referral Program	
CuttingEdge’s Investment Planning Program	
D. General Information on CuttingEdge’s Services and Fees	Pages 15- 17
Forms of Discretion Accepted	
Client Restrictions on Investment Selected for Portfolios	
Types of Reports Provided to Clients	
Our Billing Practices, Deduction of Fees from Client Accounts	
Fees of Mutual Funds, Other Products, and Custodians	
Cancellation and Termination of Advisory Agreements	
Our Policy on Class Actions, Bankruptcies and Other Legal Proceedings	
Our Proxy Voting Policies	
No Custody of Securities by CuttingEdge	
Block Trading	
Our Trade Error Policy	
E. Our Code of Ethics	Page 18
F. About Conflicts of Interests, Generally	Page 18
G. About Our Relationships with Custodians	Page 19
H. Other Business Activities	Page 19
I. Our Investment Advisory Team Members:	Page 20

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

Norman Meyer, President

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

A. About CuttingEdge Advisors, Generally

Our Firm’s History. CuttingEdge Advisors (“CuttingEdge”) was formed in 2008 by financial professionals who desired their clients to receive truly objective and unemotional investment advice. In recent years, the firm has devoted the vast majority of its business efforts toward the goal of construction of a world-class investment advisory firm, dedicated to the fiduciary principal that the client’s best interests should remain paramount at all times.

Amount of Assets upon Which Investment Management Services are Provided. As of March 1, 2016, CuttingEdge provides management services on approximately \$105,410,472 of financial assets (value generally determined as of December 31, 2015) for approximately 576 clients.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT ("BROCHURE")

B. CuttingEdge's Investment Philosophies and Strategies

Generally. CuttingEdge draws upon expansive academic research, investment information, signals received from third party investment professionals, and its own proprietary analysis to provide innovative and comprehensive fiduciary wealth management and investment advisory services. CuttingEdge monitors clients' portfolios, recommends a strategic asset allocation, recommends specific investments, and suggests changes when appropriate. CuttingEdge also suggests trading clients' portfolios utilizing a discipline approach to rebalancing (in order to maintain asset class exposures within desired risk tolerances, subject to variances permitted for tax planning or other reasons). CuttingEdge manages mutual funds, annuities, and 401(k) portfolios on a discretionary and/or non-discretionary basis.

Methods of Analysis. In designing investment plans for clients, CuttingEdge will rely on information supplied by the client, clients completed risk questionnaire, clients' investment time horizon and risk tolerance. This information becomes the basis for the strategic asset allocation plan which CuttingEdge believes best meets the client's long term stated goals. The investment plan (or portfolio) which sets forth the strategic asset allocation provides for investments in those asset classes which CuttingEdge believes (based on historical data and CuttingEdge's proprietary analysis) will possess attractive combinations of return, risk, and correlation over the long term.

Investment policy and overall portfolio weightings between equities and fixed income investments are formulated based upon client's needs and desires, tolerance and need to assume various risks, and investment time horizon. The portfolios of clients follow models designed by CuttingEdge to fit the overall weightings of equities (mutual funds) and fixed income investments (bond funds) in an investor's portfolio. For other clients, the investment portfolio's strategic asset class allocation are customized to meet the specific circumstances of a client, the presence of investments in 401(k) or other accounts, as well as CuttingEdge's perception of the client's understanding of the fundamental forces affecting risk and return in the capital markets. In addition, a client's initial strategic asset allocation may be influenced by CuttingEdge's own evaluation of the relative valuation levels of various asset classes and the investment time horizon of that client.

CuttingEdge's investment approach is firmly rooted in the belief that markets are efficient and that investor's returns are determined principally by asset allocation decisions. Cutting Edge focuses on developing globally diversified portfolios, principally through the use of actively managed mutual funds that are generally available only to institutional investors and clients of a network of selected investment advisers.

Sources of Information. CuttingEdge's security analysis is based upon a number of factors including those derived from commercially available software technology, securities rating services, general economic and market and financial information.

CuttingEdge also receives research and signals from consultants and/or firms. Consultants and/or firms may provide historical market analysis, risk/return analysis, and continuing education services to CuttingEdge. CuttingEdge may also utilize various computer software programs from

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT ("BROCHURE")

third parties in an attempt to better model the historical and/or expected returns of designed portfolios and/or to better assist clients in achieving their goals.

Types of Investments. CuttingEdge will typically create a portfolio with no-load mutual funds and bond mutual funds based on risk and/or investment goals. CuttingEdge's portfolios will primarily consist of actively managed mutual funds. The mutual funds that make up the client's portfolio offer broad diversification and most are structured for low turnover, so as to substantially lessen or eliminate the often-substantial transaction costs incurred by funds and ETF's as they trade securities within the fund. Consequentially, the mutual funds inside CuttingEdge's portfolios are believed to be generally lower than the total fees and expenses incurred by many mutual funds (including many ETF's and index funds.)

Some investment portfolios may also include individual fixed income investments (bonds, etc.). For clients with substantial fixed income allocation, CuttingEdge generally recommends a combination of bond funds and individual fixed income investments, with actual investments dependent upon CuttingEdge's views of the risk/return relationship for various forms of fixed income investments or bond funds.

Client portfolios may also include some individual equity securities, but these are generally part of clients' investment holdings prior to working with CuttingEdge.

CuttingEdge may recommend public real estate investment trusts (REITS) and commodities index or passive mutual funds or ETF's for certain clients who desire to include real estate or commodities in their asset allocation strategy.

CuttingEdge will also evaluate insurance products such as annuities and various types of life insurance products. CuttingEdge may recommend clients to invest in variable annuities when appropriate for the situation of the client. Often, this occurs when a client possesses an existing high-cost variable annuity, and a rollover of the annuity is indicated for tax planning purposes (rather than redemption), in order to seek to lower the total fees and costs paid by the client and/or to provide different investment choices.

CuttingEdge evaluates new clients' existing investments in light of the desired investment policy objectives, and works with new clients to develop a plan to transition them from a client's existing portfolio to the desired portfolio. Investment management may be offered on any investments held by a client at the start of the advisory relationship. CuttingEdge then monitors each client's portfolio holdings and strategic asset allocation, taking into account the cash flow needs of the client. CuttingEdge holds regular review meetings with clients regarding their assets under management.

CuttingEdge will typically request discretionary authority from clients to manage their investments, as such may be necessary to enable CuttingEdge to purchase and sell assets in a timely manner.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT ("BROCHURE")

Risk of Loss, Generally. Investing in securities involves a risk of loss that clients should be prepared to bear. CuttingEdge's investment recommendations seek to limit risk through broad diversification in mutual funds. While CuttingEdge's investment management seeks to limit losses through broad diversification, CuttingEdge's investment methodology will still subject the client to short-term declines in the value of their portfolios, which can at times be dramatic.

Risk of Loss, Certain Higher-Risk Securities. Certain securities that CuttingEdge may implement in its portfolios, such as U.S. small cap value, (and mid-small cap value) mutual funds, international small cap (and mid-small cap value), and high-yield bond funds, possess higher levels of volatility. CuttingEdge employs these securities as part of an overall strategic asset allocation for a client, and when such is done CuttingEdge possesses a reasonable belief that the risk-return relationship for these securities will likely be beneficial for the investor, over the long term.

Cash Balances in Client Accounts. Cash in clients' investment accounts are typically swept into the money market accounts at TD Ameritrade Institutional. CuttingEdge discusses with each client, during the time of review conferences and at other times, upcoming cash flows needs and seeks to plan accordingly to meet those needs. While it is not the practice to encourage clients to maintain a large amount of cash in their accounts, such may be undertaken at the request of the client, in anticipation of the redemption of a security at which time investments will be undertaken, or for other good reasons. Upon request of a client, CuttingEdge will invest cash balances for temporary purposes.

Account Reviews. Client portfolios are reviewed for purposes of ascertaining whether rebalancing may be indicated on a daily, weekly, monthly, and quarterly basis. Client accounts may be reviewed upon a significant movement in the valuation of an asset class since the time of the last periodic review, in the judgment of CuttingEdge. Generally, a movement in valuation of greater than 10% is required to trigger such a review.

Reports on Client Accounts. CuttingEdge and its custodians provide written reports to clients on a semi-annual, quarterly, or monthly basis. Generally, written reports include:

- Client account statements are provided monthly and directly by custodians by either mail or e-mail, and either monthly, quarterly, or annual statements from client's other custodians.
- CuttingEdge provides a consolidated view of assets under management with quarterly reports, which generally include a statement of holdings by asset class and consolidated performance reporting over various periods.
- CuttingEdge also provides clients with access to various consolidated reports online, updated each business day, for assets under management.
- CuttingEdge provides realized capital gains and losses reports to most clients each January, for purposes of tax filings to gains and losses in taxable accounts.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

C. CuttingEdge’s Advisory Programs, Generally

CuttingEdge Advisors offers three programs to new individual clients of the firm.

- CuttingEdge Asset Management Program is our core service offering and is generally available for clients with greater than \$30,000 of assets under management. The program combines ongoing investment advisory services and additionally wealth management services to clients based upon their unique circumstances and needs.
- CuttingEdge Third Party Referral Program is a service where client accounts are referred to outside third party money managers for management. These outside registered investment advisors provide advisory services outside of CuttingEdge.
- CuttingEdge Investment Planning Program offers discrete financial planning and/or investment advisory services to clients whose special circumstances indicate that they are not appropriate for the other programs. This program is not available to all prospective clients of the firm, but is determined on a case-by-case basis by the firm’s advisors.

Each of these programs is further described on the pages that follow.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT ("BROCHURE")

The CuttingEdge Asset Management Program. The CuttingEdge Asset Management Program provides the following services:

- ***Ongoing investment advisory services***, which includes a review of client portfolios for the purposes of rebalancing.
- ***Client review conferences*** annually or semi-annually during which discussions may occur regarding a range of issues, including a review of progress toward a client's lifetime financial goals, investment portfolio design and strategies, and a broad range of planning issues. Additional conferences or telephone conferences may be requested by clients to supplement the scheduled review conferences. The broad range of services provided to clients under the CuttingEdge Asset Management Program may include:
 - *Develop a total client profile*: Identify and document client's personal lifetime financial goals; discuss and analyze the clients risk tolerance; and determine personal preferences for receipt of professional services.
 - *Development of action steps* for investment strategy implementation, including tax sensitive portfolio design strategies and investment selection; establish accounts with discount broker (custodian – TD Ameritrade) as appropriate; undertake account transfers.
 - *Obtain cost basis* of securities held in taxable accounts from client then record cost basis with new custodian (TD Ameritrade).
 - *Evaluate 401(k), 403(b) and Other Employer-Sponsored Retirement Plan Investment Options*, provide recommendations to client, and integrate with other portfolio holdings.
 - *Security Evaluation: Hold, Buy or Sell*. Evaluate each existing security transferred to our firm for purposes of investment advice; Develop recommendation and review with client; Undertake agreed-upon sales and purchases for implementation of the investment strategy.
 - *Annuity and VUL Contract Reviews*. Review of variable annuity (VA) and equity (fixed) income (EIA/FIA) contracts and variable universal life insurance policies.
 - *Single Stock Exposure/Strategy Formulation*. Discussion of techniques to deal with exposure to concentrated positions in publicly traded stock, and where appropriate implementation of those techniques.
 - *Cash Reserve Account*. Assess client's need, provide recommendations, assist client with account establishment for a personal cash reserve account.
 - *Review of Total Client Profile/Goals*. Periodic review of each client's personal financial situation and any changes thereto, including the client's progress toward the attainment of that client's lifetime financial goals, and undertake any modification to those goals.
 - *Cash Flow Management; Debt Reduction Strategies; Major Financial Purchases*. Discussion of these issues as presented and/or periodically.
 - *Funding of Retirement Accounts*. Determine optimum funding for a client's qualified retirement plan account and traditional RIA accounts upon which we provide management.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

- *Retirement Account Distribution Planning.* For qualified retirement plan accounts and traditional IRA’s: required minimum distribution or other services.
- *Retirement Portfolio Withdrawal Rate.* Establish and/or review the rate and/or amount of withdrawals from a client’s investment portfolio during retirement, or to meet other current or future client needs.
- **Reports to clients, which include:**
 - Client account statements are provided monthly and directly by custodians by either mail or e-mail, and either monthly, quarterly, or annual statements from client’s other custodians.
 - CuttingEdge provides a consolidated view of assets under management with quarterly reports, which generally include a statement of holdings by asset class and consolidated performance reporting over various periods.
 - CuttingEdge also provides clients with access to various consolidated reports online, updated each business day, for assets under management.
 - CuttingEdge provides realized capital gains and losses reports to most clients each January, for purposes of tax filings to gains and losses in taxable accounts.

CuttingEdge’s annual fee for the services set forth above are charged as a percentage of assets under management, according to the schedule below (or as negotiated with the client). Billing generally occurs quarterly.

Amount of assets under management			Annual Fee
Up	to	\$500,000	2.50 %
\$500,001	-	\$1,000,000	2.00 %
\$1,000,001	-	\$1,500,000	1.50 %
\$1,500,001	and	above	1.00 %

* All fees and minimums are subject to negotiation.

Fees shall be payable quarterly, in advance, and are calculated based on the market value of the assets in the account, including any cash balances or balances held in a money market account. The initial fee is charged from the date of inception of the account through the end of the first calendar quarter in which the account is opened for at least 30 days.

Thereafter, fees are payable quarterly based upon the market value of assets in the account at the end of each calendar quarter. Assets exceeding \$10,000 deposited to an account during any quarter are charged a pro-rated quarterly fee based upon the number of days remaining in the quarter. No adjustment is made to the quarterly fees for changes in the market value of securities held in the account during the calendar quarter. No adjustment is made if assets are withdrawn during the quarter.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

CuttingEdge may, at its discretion, combine the value of related accounts for fee calculation purposes. It may also amend its fees upon 30 days advance notice to the client.

Accounts valued at under \$100,000 may be charged an additional \$30 quarterly as an administration fee.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

CuttingEdge Third Party Referral Program. CuttingEdge may provide advisory services to clients using third-party manager services.

For such clients, CuttingEdge will analyze the client’s current investments. Should CuttingEdge believe that third-party managers will add value, CuttingEdge will assist the client in using the third-party managers services.

CuttingEdge will periodically monitor the performance of the third-party managers services and discuss any potential changes with the client.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

CuttingEdge Investment Planning Program. CuttingEdge provides select clients financial planning and/or investment advisory services for a fixed fee or on the basis of hourly fees. Generally, such clients are accepted by CuttingEdge on a case-by-case basis.

Financial plans may encompass all or some of the following areas of concern to a client:

1. Estate planning
2. Retirement income planning
3. Education planning
4. Retirement needs analysis
5. Risk management counsel
6. Other financial and tax planning decisions; and/or
7. Advice on assets outside of our ongoing management.

Information for formulation of the financial plan is obtained through one or more personal interviews, which generally includes a discussion of the client’s financial status, attitudes towards money, future lifetime goals, and obtaining copies of pertinent investment and insurance information.

A written financial plan will be prepared and provided.

Fees under the CuttingEdge Investment Planning Program may be charged on an hourly or fixed fee (project) basis. Once determined, the exact fee arrangement must be set forth in writing. Fixed fees are determined based upon an estimate of the time required to perform the requested service, the complexity of the issues to be addressed and the expertise required, and the value of CuttingEdge’s advice and services. A fixed fee is then quoted for the services requested, and the exact scope of services and fee arrangement are set forth in writing. All fees are subject to negotiation.

Implementation of recommendations made under the CuttingEdge Investment Planning Program is entirely at the client’s discretion.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT ("BROCHURE")

D. General Information on CuttingEdge's Services and Fees – Applicable to All Programs

Forms of Discretion Accepted. CuttingEdge accepts limited forms of discretion over clients' accounts, as follows, with the consent of the client. Clients' grant of discretion is evidenced in the client services agreement signed by each client, and is further evidenced to the custodians through a limited power of attorney contained in the account establishment form signed by the client or a separate limited power of attorney document signed by the client. Nearly all clients appoint CuttingEdge as the client's agent with respect to undertaking trades in the client accounts. CuttingEdge's ability to enter trades electronically for clients often provides reduced transaction fees and other benefits to the client.

Pursuant to such authorization, CuttingEdge may, in its sole discretion and at client's risk, purchase, sell, exchange, convert and otherwise trade in the securities and other investments in the client's account on such markets, at such prices and at such commission as CuttingEdge believes to be in the best interest of the client. CuttingEdge shall also have authority to arrange for delivery and payment in connection with transactions for the client, and act on behalf of client and in all other matters necessary or incidental to the handling of the client's account. This authorization does not grant CuttingEdge permission to take delivery or possession of the client's funds or securities except for fees due to CuttingEdge.

CuttingEdge shall invest with limited discretionary trading authority of the client, the securities, cash and/or other assets held in the client's account with the custodian with due regard for the investment policies and restrictions the client may impose by written notice to CuttingEdge.

Client Restrictions on Investment Selected for Portfolios. Clients may place restrictions upon the investments to be held in an investment portfolio. However, because of CuttingEdge's utilization of broadly diversified mutual funds, CuttingEdge's ability to avoid investments in a specified company or industry in accordance with a client's wishes may be limited.

Types of Reports Provided to Clients. Quarterly reports are provided by CuttingEdge to its CuttingEdge Asset Management Program clients. Generally, these reports include a consolidated view of the client's accounts grouped by asset classes, a comparison of the client's actual assets class weightings to their desired targets, and a performance report showing the overall performance of the account since inception and over various time periods. Other reports may be provided from time to time, including a realized gain and losses report (typically provided in January, for the prior calendar year, for taxable accounts). In addition, clients may be provided online access to a consolidated view of the assets under advisement which provides updates to client holdings each business day. All clients receive monthly, quarterly, or annual reports of their account holdings, directly from the custodians.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

Our Billing Practices, Deduction of Fees from Client Accounts

Fees shall be payable quarterly, in advance, and are calculated based on the market value of the assets in the client’s account, including any cash balances or balances held in a money market account.

The initial fee is charged from the date of inception of the account through the end of the first calendar quarter in which the account is opened for at least 30 days. Thereafter, fees are payable quarterly based upon the market value of assets in the account at the end of each calendar quarter. Assets exceeding \$10,000 deposited to an account during any quarter are charged a pro-rated quarterly fee based upon the number of days remaining in the quarter. No adjustment is made to the quarterly fees for changes in the market value of securities held in the account during the calendar quarter. No adjustment is made if assets are withdrawn during the quarter. CuttingEdge may, at its discretion, combine the value of related accounts for fee calculation purposes. It may also amend its fees upon 30 days advance notice to the client. Accounts valued at under \$100,000 may be charged an additional \$30 quarterly as an administration fee.

Client authorizes its account custodian(s) to deduct any and all fees when due from assets held in the client’s account. Client also authorizes CuttingEdge to liquidate, without obtaining prior permission from the client, money market funds and other securities in the client’s account in amounts sufficient to cover CuttingEdge’s fees.

The management fee excludes all transaction costs including brokerage commissions. Such brokerage costs, if any, and the costs or charges not included in the fee described herein will be separately charged to the clients account.

Fees of Mutual Funds, Other Products, and Custodians. All fees paid to CuttingEdge for investment advisory services and financial planning services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders or the transaction fees charged by the custodian(s). Mutual funds expenses are described in each fund’s prospectus. These expenses will generally include a management fee, other fund expenses, and possibly a distribution fee.

Clients may also incur “account termination fees” upon the transfer of an account from one brokerage firm (custodian) to another. The range for these account termination fees is generally \$0 to \$175, but at times may be much higher. Clients should contact their custodians to determine the amount of account termination fees which may be charged and deducted from their accounts.

Cancellation and Termination of Advisory Agreements. Upon termination of the client and CuttingEdge’s agreement, fees are prorated to the date of termination. Prepaid unearned fees paid by the client are refunded, except for a termination administration fee of \$100 if the client agreement is terminated during its first year, and \$50 if terminated after the first year.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

Our Policy on Class Actions, Bankruptcies and Other Legal Proceedings. Clients should note that CuttingEdge will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities held or previously were held in the client’s account(s), including, but not limited to, the filing of “Proof’s of Claim” in class action settlements. If desired, clients may direct CuttingEdge to transmit copies of class action notices to the client or a third party. Upon such discretion, CuttingEdge will make commercially reasonable efforts to forward such notices in a timely manner.

Our Proxy Voting Policies. As a matter of firm policy and practice, CuttingEdge does not accept the authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

No Custody of Securities by CuttingEdge. It is CuttingEdge’s policy not to accept custody of a client’s securities. However, with a client’s consent CuttingEdge is provided authority to seek deduction of its fees from client’s accounts.

Block Trading. CuttingEdge may conduct block trades of funds in a clients account. As a result, CuttingEdge may achieve better pricing as to the transaction costs associated with either fixed income or mutual fund or equity trades.

Our Trade Error Policy. In circumstances involving trade errors caused by CuttingEdge, where clients incur losses as a result, clients may be “made whole” by CuttingEdge. In circumstances involving trade errors caused by CuttingEdge, where clients incur gains, such gains will be deducted from the clients account and transferred to CuttingEdge. CuttingEdge does not possess an account to offset trade error gains against losses.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT ("BROCHURE")

Our Code of Ethics. CuttingEdge Advisors has adopted a Code of Ethics, to which all investment advisor representatives and employees are bound to adhere. The key component of our Code of Ethics states:

CuttingEdge Advisors and its investment advisor representatives and employees shall always:

- Act in the best interests of each and every client;
- Act with integrity and dignity when dealing with clients, prospects, team members, and others;
- Strive to maintain and continually enhance our high degree of professional education; and
- Seek at all time to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients.

CuttingEdge has adopted a detailed Code of Ethics expressing the firms' commitment to ethical conduct. CuttingEdge's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth CuttingEdge's practice of supervising the person securities transactions of employees with access to client information. Individuals associated with CuttingEdge may buy and sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of CuttingEdge that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

CuttingEdge will provide a complete copy of its Code of Ethic to any client upon request.

E. About Conflicts of Interests, Generally.

Proper Management of Conflicts of Interests Relating to the Fees We Receive from You. The vast majority of our clients pay CuttingEdge fees based upon a percentage of the assets we manage. This is a very common form of compensation for registered investment advisory firms and avoids the multiple inherent conflicts of interests associated with commission-based compensation. Asset-advised-upon percentage method of compensation can still at times lead to conflicts of interests between our firm, its advisers, and our client as to the advice we provide.

While CuttingEdge does not accept commission-based compensation of any nature, nor does CuttingEdge accept 12b-1 fees, its advisers may receive commission-based compensation and/or 12b-1 fees along with management fee compensation. While CuttingEdge is not affiliated with any brokerage firm, its advisers may be dually registered with a brokerage firm.

We have adopted internal policies to properly manage these and other potential conflicts of interest. Our goal is that our advice to you remains at all times in your best interest, disregarding any impact of the decision to be undertaken upon our firm or our advisers.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT ("BROCHURE")

F. About Our Relationships with Custodians.

Use of Custodians, Generally. CuttingEdge utilizes the services of TD AMERITRADE INSTITUTIONAL. The custodian provides CuttingEdge with access to institutional trading and custody services, which services are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis and at no charge to them. However, not all independent investment advisors recommend their client to particular custodians.

TD AMERITRADE INSTITUTIONAL. The benefits provided by the custodian include assistance with practice management and assistance with the management of client accounts, including but not limited to:

1. Receipt of duplicate client confirmations;
2. Receipt of bundled duplicate statements;
3. Access to a trading desk serving investment adviser firm participants exclusively, and providing research, pricing information and research materials; and
4. Permitting CuttingEdge to access an electronic communication network for client order entry and to access clients' account information and which may otherwise assist CuttingEdge with its back-office functions, including recordkeeping and client reporting.

Participation in the custodian's programs also provides access to certain mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors.

The benefits received through participation in the custodian's programs may depend upon the amount of transactions directed to, or amount of assets placed in custody with TD AMERITRADE.

G. Other Business Activities.

Norman Meyer, in his individual capacity, is also a registered representative of a broker/dealer that is independent from CuttingEdge. Mr. Meyer, in his individual capacity, is also licensed and provides to his clients insurance services. Mr. Meyer clients may be clients of more than one business type that Mr. Meyer receives compensation from.

As of March 1st, 2016 FORM ADV, PART II DISCLOSURE DOCUMENT (“BROCHURE”)

H. Investment Advisory Team Members.

The educational backgrounds and employment histories of CuttingEdge Advisors President is described in the following pages.

CuttingEdge requires each person with professional designations to complete annual continuing education requirements, if they are required to do so by reason of the professional designation or certification program

Norman Meyer. President.

Educational Background. Norman Meyer is a graduate of Quincy University with a B.S. degree in Finance.

Employment History. Mr. Meyer has founded CuttingEdge and has served as its President since 2008. Previously, he has also served as a financial professional and an office of supervisory jurisdiction (OSJ) for a number of years.

Personal Summary. Mr. Meyer was born and raised in Saint Louis, MO. He is married and has two children with whom he enjoys horseback riding, various sports, and spending time outdoors.