

## Item 1 Cover Page

Part 2A of Form ADV

Firm Brochure

Valpar, Inc.

701 P Street, Suite 303

Lincoln, NE 68508

Phone: (402) 440-3910

Date: March 16, 2012

This brochure provides information about the qualifications and business practices of Valpar, Inc. If you have any questions about the contents of this brochure, please contact us at (402)440-3910. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Valpar, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Please note that registration as an investment advisory firm does not imply a certain level of skill or training.

## **Item 2      Material Changes**

As of this filing, we are changing registrations from SEC to State registrations.

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## **Item 4      Advisory Business**

### **About the Firm**

Valpar, Inc. (the “Adviser”) is a qualified retirement plan management company and a Registered Investment Adviser servicing small and mid-sized plan sponsors with from 1 to 500 employees. We also give advice, through a sub-advisory agreement, to another registered investment advisor.

We started offering these services in 2008. Our owner is Don A. Brubaker.

### **Description of Advisory Services**

We offer a variety of services including:

- Qualified Plan Design
- Qualified Plan Document Drafting and Approval
- Contract Qualified Plan Annual Compliance & Reporting
- Investment Policy Consulting and Drafting
- Qualified plan Mutual Fund Investment Selection and Monitoring
- Plan Participant Education and Asset Allocation Advice
- Exit Planning Advice for Retiring Plan Participants including Asset Allocation and Distribution Advice
- Individual Retirement Account Asset Allocation Advice
- Individual Investment Advice for Taxable Accounts

Many of the services listed above constitute pension consulting. We manage client assets. As of December 31, 2011, our discretionary assets under management were \$2,200,000 and our non-discretionary assets under management were \$69,400,000.

## **Item 5      Fees and Compensation**

### ***Fees to Plan Sponsors or Participants***

We offer our services as a percentage of assets under management, through annual fixed fees and through annual participant-based fees or a combination of a percentage of assets under management and annual fixed fees and annual participant-based fees. These fees range as listed below, and the actual fee(s) paid by a plan sponsor or participant vary based upon the size of the plan, the quantity of participants and the services selected.

- Annual fixed fees range from \$500 to \$10,000.

- Annual participant based fees range from \$25 to \$300 per participant
- Annual Asset Based fees range from .1% to 1%

Asset-based fees are calculated at the end of each billing period which may be monthly, quarterly, or annually. The asset-based fee is based on the asset value as of the last day of the billing period and is charged in arrears.

Fees billed and or assessed may be offset by any type of service related revenue received by or for the plan from investment/fund companies where all or part of the plan's assets are invested.

### ***Fees for Retirement Plan Compliance Management***

These fees are paid annually.

- Annual fixed fees range from \$600 to \$1,500.
- Annual participant based fees range from \$10 and \$15 per participant
- Accounting fee ranging from \$250 to \$1,500

### ***Fees for Sub-Advice***

For our subadvisory services, we receive a portion of the fee charged to clients of the third party advisor. This fee is typically 30% of the fee charged by the third party advisors.

### ***Information about Fees***

All fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. Such fees will generally include a management fee, other fund expenses and a possible distribution fee. Lower fees for comparable services may be available from other sources

You could invest in a mutual fund directly, without our services. In that case, you would not receive the other services we provide, which are designed, among other things, to assist you in determining which mutual fund or funds are most appropriate to your financial condition and objectives. Accordingly, you should review both the fees charged by the funds and the fees we charged to fully understand the total amount of fees you will pay and to thereby evaluate the advisory services being provided.

Upon receiving your written authorization, fees will be automatically deducted from the account. You are provided a quarterly statement reflecting the deduction of the advisory fee.

You can terminate, without penalty, our Advisory Agreement within five business days. Thereafter, either of us can serve written notice of termination.

If you terminate our services in the middle of a quarter, you will owe us a pro-rated amount of fees. The pro-rated fees will depend upon actual services and termination costs incurred up to and at the time of termination of the Adviser's services.

## **Item 6      Performance-Based Fees and Side-by-Side Management**

We do not accept performance-based fees.

## **Item 7      Types of Clients**

We typically work with small and mid-sized plan sponsors with from 1 to 500 employees. We also give advice to individuals.

We have no minimum account size.

## **Item 8      Methods of Analysis, Sources of Information and Risk of Loss**

All investing involves risk that you should be prepared to bear. You may lose some or all of your money.

We use the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

We use the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)

There are no unusual risks associated with our investment strategies or methods of analysis other than those associated with investing in general. All investments are subject to market risk. Market risk is the risk that your investments will be worth less than when you originally invested. Markets fluctuate, causing the value of your investments to fluctuate.

## **Item 9      Disciplinary Information**

Neither the Firm nor any of our management persons have been involved in any events that are material to a client's or prospective client's evaluation of the Firm or the integrity of its management.

## **Item 10      Other Financial Industry Activities and Affiliations**

We have no other financial industry activities or affiliations. We feel that all material conflicts of interest under CCR 260.238 (k) (n) are disclosed regarding Valpar, Inc. its representative, or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice

## **Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Associated persons may buy or sell for their own accounts the same securities recommended to you. This is limited to no-load mutual funds. They may do so at the same time as they, or a related person, buy or sell the same securities for their own account. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to you. We request information about all of our associate's transactions and monitor them for any wrongdoing.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Advisor does not deem appropriate to buy or sell for clients.

We have adopted a Code of Ethics to instruct our personnel in their ethical obligations and to provide rules for their personal securities transactions. The Firm and our personnel owe a duty of loyalty, fairness and good faith to their clients, and the obligation to adhere not only to the specific provisions of the code but also to the general principles that guide the Code. The Code covers a range of topics including general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. We will provide a copy of the Code to any client or prospective Client upon request.

## **Item 12 Brokerage Practices**

We do not receive any research or other products or services other than execution from a broker-dealer or third party in connection with your securities transactions. Nor do we receive any client referrals from a broker-dealer or third party.

Due to the nature of our service, as an ordinary course of business, seldom do any trading.

We typically recommend MG Trust Company as a Custodian. This firm was chosen on the basis of it being conducive to conducting investment advisory business, its low trading costs and access to the desired variety of products and research services. Another important factor in selecting MG Trust Company is that it has over 40 years of trust and fiduciary experience and currently services more than 20,000 plan accounts with more than \$15 Billion in aggregate plan assets.

## **Item 13 Review of Accounts**

Don Brubaker reviews accounts on a regular basis. This review may be as frequent as daily or as infrequent as monthly and is dependent on market volatility and customer objectives.

We provide ongoing written reports to clients upon their request.

## **Item 14     Client Referrals and Other Compensation**

We do not pay anyone for client referrals for our accounts.

## **Item 15     Custody**

We have custody of client funds in that we deduct fees from your accounts. The custodian of your assets sends quarterly statements directly to you. You should carefully review those statements.

## **Item 16     Investment Discretion**

We accept discretion on a very limited basis. At this time, discretionary accounts are limited to immediate family members of Don Brubaker and one testamentary trust. In order to grant discretion, clients must first sign a form giving us discretion.

## **Item 17     Voting Client Securities**

We do not vote proxies on your behalf. You retain that right unless you make other arrangements with the custodian of your assets. You will receive proxies or other solicitations directly from the custodian of your assets. You may contact us with questions about proxies.

## **Item 18     Financial Information**

We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to you.

## **Item 19     Requirements for State-Registered Advisers**

Don A. Brubaker Born: July 3, 1956

### Educational Experience

Bachelor of Business Management, Doane College, Crete, NE, 1978

Qualified Pension Administrator, American Society of Pension Actuaries, 1994

Enrolled Retirement Plan Agent, 2009

### Business Experience for preceding ten years:

Valpar, Inc.

President, 2007 – Present

Pine Lake Advisors, Inc.

President/CEO/CCO 1997 – 2006



Assurity Life/Security Financial Life of Lincoln Nebraska

Vice President, Group Life Division 1991- 2005

Vice President, Retirement Plan Division 1990 – 1997

Our firm also provides Retirement Plan Compliance Services. The fees for this service are described in Item 5. As of March 2012 this service comprises 50% of Don Brubaker's time.

## **Brochure Supplement**

### **Item 1      Cover Page**

Part 2B of Form ADV

Valpar, Inc.

701 P Street, Suite 303

Lincoln, NE 68508

Phone: (402) 440-3910

Date: March 31, 2011

This brochure supplement provides information about Don A. Brubaker that supplements our firm brochure. Please contact us at (402) 440-3910 if you did not receive Valpar, Inc.'s brochure or if you have any questions about the contents of this supplement.

### **Item 2      Educational Background and Business Experience**

Don A. Brubaker Born: July 3, 1956

#### **Educational Experience**

Bachelor of Business Management, Doane College, Crete, NE, 1978

Qualified Pension Administrator, American Society of Pension Actuaries, 1994

Enrolled Retirement Plan Agent, 2009

#### **Business Experience for preceding ten years:**

Valpar, Inc.

President, 2007 – Present

Pine Lake Advisors, Inc.

President/CEO/CCO 1997 – 2006

Assurity Life/Security Financial Life of Lincoln Nebraska

Vice President, Group Life Division 1991- 2005

Vice President, Retirement Plan Division 1990 – 1997

### **Item 3      Disciplinary Information**

Mr. Brubaker is not subject to any material legal or disciplinary event.

### **Item 4      Other Business Activities**

Mr. Brubaker has no outside business activities.

### **Item 5      Additional Compensation**

There are no such issues to be disclosed.

### **Item 6      Supervision**

Mr. Brubaker is the sole owner and associate of Valpar, Inc. and supervises himself. Mr. Brubaker, Member and Chief Compliance Officer can be reached at (402) 440-3910 should you have any concerns.

### **Item 7      Requirements for State-Registered Advisers**

We have no further information to disclose in this item.