

Monex Asset Management, Inc.

Form ADV: Part II

Uniform Application for Investment Advisor Registration

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**Form ADV
Part II - Page 1**

Uniform Application for Investment Adviser Registration

Name of Investment Adviser:

Monex Asset Management, Inc.

Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone number:
5151 San Felipe, Suite 1350	Houston	Texas	77056	713-877-8234

**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.**

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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

(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.)

Applicant:
Monex Asset Management, Inc.

SEC File Number:
801-69526

Date:
01/22/2009

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 instructions below.)

Applicant:

<input checked="" type="checkbox"/>	(1) Provides investment supervisory services	100 %
<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 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 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).

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 type="checkbox"/> I. Options contracts on: |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input checked="" type="checkbox"/> (1) securities |
| <input checked="" type="checkbox"/> (3) foreign issuers | <input type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> B. Warrants | <input type="checkbox"/> J. Futures contracts on: |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| <input checked="" type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| <input type="checkbox"/> G. Investment company securities: | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> (2) variable annuities | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input 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 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 type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

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

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Long term purchases (securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases (securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input checked="" type="checkbox"/> Short sales | |

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

Applicant: Monex Asset Management, Inc.	SEC File Number: 801-69526	Date: 01/22/2009
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5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes ☒ No ☐

(If yes, describe these standards on Schedule F.)

6. Education and Business Background

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- | | |
|-----------------|--|
| • name | • 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 checked="" type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading advisor 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 in 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).

Applicant:

Monex Asset Management, Inc.

SEC File Number:

801-69526

Date:

01/22/2009

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

(If yes, describe on Schedule F)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

See Attached Schedule F

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

See Attached Schedule F

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

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Applicant:
Monex Asset Management, Inc.

SEC File Number:
801-69526

Date:
01/22/2009

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | Yes | No |
|--|-------------------------------------|-------------------------------------|
| (1) securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

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

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

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

Has applicant provided a Schedule G balance sheet?

Yes No
☐ ☒

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:
Monex Asset Management, Inc.

SEC File Number:
801-69526

Date:
01/22/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:
Monex Asset Management, Inc.

IRS Empl. Ident. No.:
26-2977896

**Part II, Page
2, Item 1D**

Advisory Services and Fees.

Monex Asset Management, Inc. ("Monex Asset or Advisor") provides discretionary and non-discretionary investment advisory and consulting services to individuals, trusts, estates and charitable organizations. Investment advice and portfolio management services are provided on a continuing basis including the appropriate allocation of managed assets among cash, stocks, mutual funds and bonds. This selection of specific securities will provide proper diversification and help to meet the client's stated investment objectives. These services include discretionary management services.

The fee schedule is as follows:

Assets Under Management	Annualized Fee
<hr/>	
\$0.00 to \$250,000.00	2.75%
\$250,000.01 to \$499,999.99	2.00%
\$500,000.00 to \$1,000,000.00	1.00%
\$1,000,000.01 to 2,000,000.00	0.75%
over \$2,000,000.01	0.25%

The client pays the Advisor for its investment management services based upon the client's assets under management as set forth in above fee schedule. Fees are calculated by multiplying the assets under management by the relevant percent and dividing such product by four (4). Accounts opened in mid-quarter will be assessed at a pro-rated management fee. Fees are payable semi-annually, in arrears and such fees may be deducted from client's account(s) quarterly within five (5) days following the end of the semi-annual for which said fees will be incurred. The advisory fee for the initial quarterly period shall be prorated for the initial semi-annual period, based on the opening date of the account and the net asset value of the assets held in the account on that date. All advisory fees are negotiable.

Fees are calculated on an incremental basis and are subject to change with 30 days written notice. Notwithstanding the above, certain clients of the Advisor with pre-existing relationships may initially be charged fees which are less than those set out above. Regarding employee-related accounts and certain other accounts, the quarterly fees may be less, depending upon a number of factors, including portfolio size, length of employment, and relationship to the employee.

Monex Asset maintains a Limited Power of Attorney for all discretionary accounts for the purposes of directing and/or otherwise effecting investments on behalf of the managed account for the direct payment of the Advisor's fees and or the payment of commissions, custodial fees, and or other charges incurred by the managed account.

To the extent mutual funds are selected to fill components of the overall investment strategy, the annual advisory fee set forth above does not include the customary fees and expenses associated with investing in mutual funds or other costs of establishing and maintaining an account with mutual funds including Rule 12b-1 fees and expenses. The client is advised that, in addition to the annual advisory fee set forth above, each mutual fund in which assets are invested will incur separate investment advisory fees and other expenses for which Client will bear a proportionate share.

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

Applicant:
Monex Asset Management, Inc.

SEC File Number:
801-69526

Date:
01/22/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Monex Asset Management, Inc.		IRS Empl. Ident. No.: 26-2977896
	<p>Proxy Voting. The Advisor shall not take any action or render any advice with respect to the voting of proxies solicited by, or with respect to, the issuers of any securities held in the Accounts.</p> <p>Termination. The relationship between the parties may be terminated by either party upon 30 days written notice. Notwithstanding the above, if the appropriate disclosure statement was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory contract with this investment adviser, then the client has the right to terminate the relationship, contract without penalty, within five (5) business days after entering into the contract. The Client will be entitled to a pro rata refund of any pre-paid quarterly fee based upon the number of days remaining in the quarter after termination.</p>	
Part II, Page 4 Item 5	<p>Education and Business Standards.</p> <p>Monex Asset generally requires associated persons to have a college degree or a minimum four years related experience, have displayed a high degree of integrity in previous business background, have high standards of morals and ethics and be committed to providing quality investment advice. All associated persons must have the required licenses for an investment adviser.</p>	
Part II, Page 4, Item 6	<p>Education & Business Background.</p> <p>Jesus Heiras Born: 1973</p> <p>Employment History: 11/2005 to Present –Vice President and General Principal, Monex Asset Management, Inc. 10/2005 to Present – Registered Principal, Registered Representative, Monex Securities, Inc. 11/2004 to 10/2005 – Registered Representative, Actinver Securities 10/2001 to 10/2004 – President, General Securities Principal, First Capital Securities, Inc.</p> <p>Jorge Ramos Landero Born: 1962</p> <p>Education: Year 1988 – Graduated from Reading University with a Master of Arts in International Business and International Financial Management Degree.</p> <p>Employment History: 11/2005 to Present – President, & Chief Compliance Officer, Monex Asset Management, Inc. 11/2003 to Present – President, General Securities Principal, Chief Compliance Officer, Monex Securities, Inc. 06/2006 to Present – Supervisor, Manager of Equity Trading Department, Monex Casa De Bolsa. 1/2000 to 08/2003 – Registered Representative, Invex, Inc.</p> <p>Jose Balcazar Born: 1982</p> <p>Education: Year 2006 - Graduated from Instituto Tecnológico de Estudios Superiores de Monterrey University with an Industrial and Systems Engineering Degree.</p> <p>Employment History: 08/2007 to Present – Registered Representative, Monex Asset Management, Inc.</p>	

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:
Monex Asset Management, Inc.

SEC File Number:
801-69526

Date:
01/22/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Monex Asset Management, Inc.		IRS Empl. Ident. No.: 26-2977896
	11/2003 to Present – Registered representative, Monex Securities, Inc. 09/2006 to 09/2007 – Product Specialist, Monex Casa De Bolsa. 08/1996 to 08/2006 – Student	
Part II, Page 4, Item 8C (1)	Other Financial Industry Activities or Affiliations. The principal executive officers and other employees are separately licensed as registered representatives of Monex Securities, a FINRA registered broker/dealer and investment adviser located in Houston, Texas. They will be able to effect securities transactions and offer insurance products for clients, for which they will receive separate, yet customary compensation in addition to any advisory fees paid by the Client. This presents a conflict of interest to the extent that the associate recommends that a client invest in a security which results in a commission being paid to the associate. Principals and associates will devote their time as needed between these functions, but the majority of their time is currently devoted to the broker/dealer activities. While these individuals endeavor at all times to put the interest of the clients first as part of Monex Asset's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.	
Part II, Page 5, Item 9E	Participation or Interest in Client Transactions. No security may be bought or sold by a principal or employee of Monex Asset before Monex Asset's clients' accounts have had the opportunity to make such transactions as appropriate. Principals and employees will not receive a more favorable execution price on a particular day than those received by Monex Asset's investment advisory clients. To prevent conflicts of interest, all employees of Monex Asset must comply with the firm's Supervisory Procedures, which imposes restrictions on the purchase or sale of securities for their own accounts and the accounts of certain affiliated persons. The Supervisory Procedures require that all trades made by employees or related persons of Monex Asset, who make recommendations or participate in the determination of which recommendation shall be made, will require review for all securities transactions by the designated person responsible (except transactions in investment company securities and/or other exempt transactions). Monex Asset will also maintain quarterly reports on all personal securities transactions, except transactions in investment company securities and/or other exempt transactions. Further, the Supervisory Procedures impose certain policies and procedures concerning the misuse of material non-public information that are designed to prevent insider trading by any officer, partner, or associated person of Monex Asset. Notwithstanding the above, Monex Asset, and/or their officers, directors or employees may purchase for themselves similar or different securities as are purchased or recommended for investment advisory clients of Monex Asset, and that different securities or transactions may be affected or recommended for different investment advisory clients of Monex Asset. Code of Ethics Monex Asset has adopted a Code of Ethics to ensure that securities transactions by the Adviser's employees are consistent with the Firm's fiduciary duty to its clients and to ensure compliance with legal requirements and the adviser's standards of business conduct. Monex Asset requires transaction confirmation and quarterly reporting. A written copy of Monex Asset's Code of Ethics is	

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

Applicant:
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Date:
01/22/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Monex Asset Management, Inc.		IRS Empl. Ident. No.: 26-2977896
	<p>available upon request.</p> <p>Business Continuity Plan Monex Asset has developed a Business Continuity Plan to address how the Firm will respond to events that may disrupt its business. Since timing and impact of disasters is unpredictable, the Firm will have to be flexible in responding to the events as they occur.</p> <p>This Plan is designed to permit our Firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. The Business Continuity Plan covers data back up and recovery, mission critical systems financial and operational assessments, alternative communications, alternate business locations, bank and counter-party impact, regulatory reporting and the assurance of prompt access to funds and securities for our customers.</p> <p>Varying Disruptions – Significant business disruptions can vary in their scope, such as emergencies affecting only a single building housing our Firm, the business district where our Firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our Firm or a building housing our Firm, we will transfer our operations to an emergency-ready local site, moving a select group of trained employees and expecting to recover and resume business within four hours. In a disruption affecting our business district, city, or region, we will move appropriate staff to a site outside of the affected area to be able to communicate with Pershing, LLC on behalf of our clients. In either situation, we plan to continue in business, transferring operations to our clearing firm, if necessary.</p> <p>If you have questions about the Firm's Business Continuity Plan, please feel free to contact us.</p>	
Part II, Page 5, Item 11A	<p>Review of Accounts.</p> <p>Jorge Ramos will review all accounts on a quarterly basis and compare each investment on a transaction basis to insure that each transaction is: (i) suitable to the respective client's investment objectives; (ii) meets that client's quality standards; and (iii) to make sure that their investment objectives are still pertinent to the managed account arrangement. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances or the market economic or political environment.</p>	
Part II, Page 5, Item 11B	<p>Reports.</p> <p>The clients receive brokerage transaction confirmations and monthly statements from the custodian of the account.</p>	
Part II, Page 5, Item 12 A and B	<p>Investment or Brokerage Discretion/Recommendations. Monex Asset will supervise and direct the investments of the client accounts subject to such limitations as the client may impose in writing. Monex Asset, as agent and attorney-in-fact with respect to the client's account, without prior consultation with the client, may, (a) direct the purchase, sell, exchange, conversion, and otherwise trade in stocks, bonds and other securities including money market instruments, (b) direct the amount of securities purchased, sold, exchanged, and otherwise traded, (c) place orders for the execution of such securities transactions with Actinver Securities or other third party broker/dealers, and (d) determine the commission rates paid.. Monex Asset will allocate brokerage transactions in a manner it believes to be fair and responsible to its clients, and consistent with client objectives. Adhering to a strict formula will not be practicable given the variation in client objectives and guidelines.</p>	

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

Applicant:
Monex Asset Management, Inc.

SEC File Number:
801-69526

Date:
01/22/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:
Monex Asset Management, Inc.

IRS Empl. Ident. No.:
26-2977896

Unless Client instructs Monex Asset otherwise, the firm may place orders for the execution of transactions with or through a broker/dealer as Monex Asset may select, and complying with Section 28(e) of the Securities Exchange Act of 1934, may pay a commission on transactions in excess of the amount of commission another broker or dealer would have charged. Monex Asset will select such brokers that can effect transactions at the best price and execution under the prevailing circumstances. In managing investment portfolios, Monex Asset acts in a manner in keeping with what it understands and believes to be the best interests of the client. Individual securities are selected to provide diversification among economic sectors and industries which are chosen to achieve the desired balance between expected risk and expected return. Transactions of an unusual nature are discussed with clients before execution.

It is not Monex Asset's practice to negotiate "execution only" commission rates; thus the client may be deemed to be paying for other services provided by the broker which are included in the commission rate. These other services may include research, services such as marketed publications, advice, analysis, reports or on line financial information. Research services furnished by Monex Asset to its brokerage clients may or may not be used by Monex Asset in the servicing of its investment advisory clients.

Directed Brokerage

Monex Asset may place all or a portion of the transactions with a broker with whom the client has a special advisory or consulting relationship. Such transactions are placed with a broker who may have provided manager selection services, performance measurement services, asset allocation services, or a variety of other consulting or monitoring assistance, all with the specific knowledge and full approval of the client.

Monex Asset does not maintain agreements with referring brokers regarding our internal allocation of brokerage transactions. However, all or a sizable portion of a particular clients' brokerage transaction business may be directed to a particular broker if the client has directed, agreed or stipulated us to do so. Commissions are not intended to compensate brokers for client referrals.

With regard to client directed brokerage, Monex Asset is required to disclose that they may be unable to negotiate commissions, block or batch client orders or otherwise achieve the benefits described above, including best execution, if you limit our brokerage discretion. Directed brokerage commission rates may be higher than the rates Monex Asset might pay for transactions in non-directed accounts. Also, clients that restrict our brokerage discretion may be disadvantaged in obtaining allocations of new issues of securities that we purchase or recommend for purchase in other clients' accounts. It is the Monex Asset's policy that such accounts not participate in allocations of new issues of securities obtained through brokers and dealers other than those designated by the client. As a general rule, Monex Asset encourages each client to compare the possible costs or disadvantages of directed brokerage against the value of the custodial or other services provided by the broker to the client in exchange for the directed broker designation.

Aggregate of Trades

When Monex Asset trades the same security in more than one client account, they generally attempt to batch or "bunch" the trades in order to create a "block transaction." Generally, buying and selling in blocks helps create trading efficiencies, prompt attention and desired price execution. We will place all or substantially all transactions to purchase or sell common stocks

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

Applicant:
Monex Asset Management, Inc.

SEC File Number:
801-69526

Date:
01/22/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Monex Asset Management, Inc.		IRS Empl. Ident. No.: 26-2977896
	<p>with the client's "directed" broker, when applicable. (See the discussion above entitled, "Directed Brokerage") Whenever possible, the we will attempt to batch or aggregate trades for clients who use the same directed brokers in order to create a "block transaction."</p> <p>The commission amount and per share commission rate will differ between our clients with directed brokerage relationships due to the dollar value and the size (number of shares) of the trade for each account, and the total relationship between the client and their broker. Because each client may differ in portfolio size, investment objective, equity exposure and the extent of the relationship with their broker, we do not negotiate commission discounts on the block transaction itself.</p> <p>No commission is added to transactions in the case where the client has established a "fee in lieu of commission" account. We may identify instances for which we are unable to achieve best execution of securities trades in "fee in lieu of commission" or "wrap" accounts that we manage. In those circumstances, we may execute a trade as a "step-out" transaction with another broker that has agreed to execute the transaction without charging a commission. We will, however, trade with such brokers at their prevailing commission rates for our non-wrap clients for whom we have brokerage discretion either as part of the same "block transaction" or for different transactions.</p>	
Part II, Page 5, Item 13 A	<p>Additional Compensation</p> <p>Monex Asset's advisory representatives may receive benefit in the form of commissions for securities.</p> <p>Monex Asset may receive from custodians, without cost, software and support which allows the Company to better monitor and service client accounts. The Firm may receive the software and support without cost because Monex Asset renders investment advisory services to clients that maintain accounts with certain custodians.</p> <p>Monex Securities also makes available to Monex Asset other products and services that benefit Monex Asset but may not benefit its client's accounts. Some of these other products and services assist Monex Asset in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such 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 Monex Asset's fees from its clients accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Monex Asset's accounts, including accounts not maintained at Monex Securities. Monex Securities also makes available to Monex Asset other services intended to help Monex Asset to manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Monex Securities may make available, arrange and/or pay for these types of these services or pay all or a part of the fees of a third party providing these services to Monex Asset. While as a fiduciary, Monex Asset endeavors to act in it's clients' best interests, and recommends that clients maintain their assets in accounts at Monex Securities may be based in part on the benefit to MonexAsset of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Monex Securities, which may create a potential conflict of interest.</p>	

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**Part II, Page 5,
Item 13 B**

Monex Asset may enter into written agreements to pay referral fees to other investment advisers who are unaffiliated individuals. Prior to entering into any investment advisory agreement with a client through these referral agreements, the Firm will determine if the solicitor has provided the client with a written disclosure document stating that the solicitor is being compensated for referring The Firm and the terms of the compensation arrangement.