



Form ADV Part II

Full Company Name: Quovo, LLC

SEC File Number: 801-70646

IRS EIN: 27-0564833

Date: 3-28-2011

Contents

OVERVIEW.....3

TYPES OF CLIENTS.....3

SERVICES AND FEES.....3

TYPES OF INVESTMENTS5

PROXY VOTING POLICY.....5

INVESTMENT METHODS AND STRATEGIES5

EDUCATION AND BUSINESS STANDARDS.....6

EDUCATION AND BUSINESS BACKGROUND.....6

DISCIPLINARY INFORMATION.....6

CODE OF ETHICS.....6

MINIMUM ACCOUNT SIZE.....7

ACCOUNT REVIEWS AND REPORTS.....7

INVESTMENT DISCRETION.....7

BROKERAGE PRACTICES.....7

APPENDIX A: FINANCIAL STATEMENTS.....9

OVERVIEW

This brochure provides information about the qualifications and business practices of Quovo, LLC (hereinafter "Quovo"). Please contact, W. Lowell Putnam, Managing Member, if you have any questions about the contents of this brochure. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission or by any State securities authority.

Additional information about Quovo is available on the Internet at http://www.adviserinfo.sec.gov/IAPD/Content/IapdMain/iapd_SiteMap.aspx

You can search this site using Quovo, LLC as the name of the investment adviser.

TYPES OF CLIENTS

Quovo's client base and prospective client base is diverse and always growing. Our clients or prospective clients may include any of the following entities:

- Individuals
- Trusts, estates, or charitable organizations
- Pensions and profit sharing plans
- Corporations or business entities other than those listed above

In all cases, Quovo is dedicated to meeting the investment objectives of each client, and we will not take on any new client if such relationship precludes us from continuing to deliver a high level of service to our existing clients.

SERVICES AND FEES

Quovo provides investment management services to clients on a discretionary basis. Quovo's investment decisions, however, are guided by the individual investment opinions and strategies of Quovo's community of on-line internet-user clients. Clients of Quovo may be individuals, pension plans, or other types of investors.

Prospective clients may be asked to complete an on-line questionnaire that will provide guidance regarding the selection of an appropriate investment strategy.

Quovo may also offer investment advice for clients who do not wish to have an advisor directly manage their money, but who are seeking investment advice and guidance. This advice will be given to clients through Quovo's online systems, primarily based on the consensus-based algorithms described below.

As of December 31, 2010, approximately 90% of Quovo's business was focused on advisory advice and reports for clients, and the remaining 10% of the business was focused on the direct management of client funds. Going forward, this balance may shift towards more direct management, but in 2011 it is expected that the business will remain primarily focused on advisory reports and advice.

Quovo has created a proprietary set of algorithms that combine the independent views of Quovo's user clients into a consensus investment opinion. Quovo's web site includes blogs, group discussions, and polls where user clients may share information and opinions regarding investments in public companies. Quovo user clients may also link

their other investment accounts, from which Quovo may gather information about that user client's investment choices.

Based on the information shared by Quovo user clients, Quovo's proprietary algorithms will generate consensus opinions about securities investments. Quovo will further subject securities to votes by its user clients. Quovo will generate what it determines are consensus opinions from all of these sources of information to guide its management of client accounts. While Quovo will not always invest based on consensus opinions, it is Quovo's intention to primarily rely on such opinions for investment decision-making.

The outputs of our system may result in advice for long term purchases, short term purchases, or "trades" (selling a security within 30 days of purchase). In most cases, our system promotes a long term "buy and hold" strategy of investing.

As a result of this process, a user client may be invested in the same securities as other user clients even if a user client did not support a particular investment decision. User clients may, however, impose reasonable restrictions on investments that may be implemented in such person's accounts. While such restrictions may not be so broad as to nullify the discretionary authority of Quovo, individual securities restrictions may, for example, be requested by the user client.

To be a Quovo client, a person or institution must contractually agree to receive all record regulatory documents and other reports provided by Quovo via electronic delivery of email.

There is no guarantee that the securities market or securities that Quovo selects for investment will increase in value. It is possible to lose money by investing with Quovo. Quovo's proprietary algorithms have not been back-tested, and the generation of profitable securities recommendations cannot be guaranteed or promised.

The value of securities investments will go up and down in response to changes in the market value. Market value will change due to business developments concerning a particular issuer or industry, as well as general market and economic conditions. An undervalued stock may not increase in price as anticipated by Quovo if other investors fail to recognize the company's value or the factors that the Quovo believed would increase the price does not occur. A user client should be able to accept significant short-term fluctuations in value.

Quovo generally charges a fee of one percent of the assets under management for each user client. Quovo charges this fee quarterly in arrears based on the market value of the account. Quovo expects to limit investments to securities for which readily available market values are available, as reflected in reports and pricing from account custodians.

For clients who receive investment advice from Quovo (in lieu of or in addition to asset management services), fees will depend on the type or reports generated for that client. These reports vary in cost depending on the information and advice contained within each report. Prospective subscribers can see details on all of Quovo's reports on its website, although they will first be required to create a free account and establish a profile prior to seeing the available reports.

Quovo will request authority from clients to directly debit its advisory fee directly from the client's managed account(s). Fees are not individually negotiable.

All fees paid to Quovo for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds, including money market accounts, to their shareholders. In addition, user clients are responsible for all broker and custodian fees respective to their accounts.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 5 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

TYPES OF INVESTMENTS

Quovo provides investment advice on the following types of financial instruments:

- Exchange-listed securities (including but not limited to: common stock, preferred stock, exchange traded funds (ETFs), etc.)
- Securities traded "over-the-counter"
- Mutual fund shares

PROXY VOTING POLICY

Quovo exercises discretionary proxy voting authority for its user clients unless otherwise specified. Quovo has adopted voting policies designed to vote proxies with the ultimate goal to benefit the economic interests of user clients. At Quovo's discretion, Quovo may accept from its user client community input regarding proxy voting decisions, and may solicit such opinions and, at times, voting input. Typically, Quovo will only seek input from the client user community for matters it determines of substantial interest or that may materially impact a company's value.

In the event of a vote involving a conflict of interest that does not meet the specific voting parameters of Quovo's proxy voting guidelines or requires additional company-specific decision-making, Quovo will vote according to the results of its proprietary algorithmic analysis tools.

In addition, Quovo clients may engage in their own proxy voting. In these cases, user clients may use the Foliofn online proxy voting systems.

Clients may request a copy of Quovo's proxy voting policy via Quovo's web site. Clients may also request voting records of how securities have been voted in their particular account. Please provide Quovo with a reasonable time to compile records following a client request.

INVESTMENT METHODS AND STRATEGIES

As described above, Quovo utilizes client user information from sources such as investment accounts, blogs, group discussions, and polls to generate consensus opinions on securities.

EDUCATION AND BUSINESS STANDARDS

Quovo requires investment personnel to have appropriate education and business background. From time to time, Quovo employees may buy and sell the same securities that are recommended to our clients.

EDUCATION AND BUSINESS BACKGROUND

(Warren) Lowell Putnam
Born 10/31/1982

Mr. Putnam received a Bachelor of Arts Degree from Harvard College in June 2005 (majoring in American History and Literature). He began as an Associate in the Investment Banking Division of Lehman Brothers/Barclays Capital from July 2005 to October 2008. Since October 2008, he has been working on the development of Quovo, which he formally established as the Managing Member in June, 2009.

As a business entity, Quovo LLC has other members and employees, however, as of the date of this brochure, none of such members or employees have access to client information or are responsible for making investment advisory decisions.

DISCIPLINARY INFORMATION

Neither Quovo nor any of its principal employees have been involved in any material disciplinary, criminal or civil actions.

CODE OF ETHICS

Quovo has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. Quovo's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth Quovo's practice of supervising the personal securities transactions of employees with access to client information.

Individuals associated with Quovo may buy or sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of Quovo 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.

To supervise compliance with its Code of Ethics, Quovo requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the firm's Chief Compliance Officer or his or her designee. Quovo also requires such access persons to receive approval from the Chief Compliance Officer (CCO must receive pre-approval from a separate appropriate person) prior to investing in any IPO's or private placements.

MINIMUM ACCOUNT SIZE

The minimum account size is \$5,000.

ACCOUNT REVIEWS AND REPORTS

Quovo's proprietary system regularly reviews current holdings and a designated watch list of potential investments. Lowell Putnam further reviews holdings and results from the algorithms to exercise investment discretion. Additional account reviews are performed to monitor for contributions to accounts. New accounts and additional contributions to accounts may be implemented according to the portfolio then established for each particular investment strategy.

Quovo does not intent to send user clients regular reports. Quovo will however provide regular updates on investment decisions through its web site application.

INVESTMENT DISCRETION

As described above, user clients may be required to provide Quovo with investment discretion to select securities and the amount of securities to purchase and sell within investment management accounts, subject to reasonable restriction that may be imposed.

Quovo does not engage in any brokerage or other service referrals to our clients, and we do not receive compensation from any outside source for providing investment advice or referring any outside service to our clients.

BROKERAGE PRACTICES

Quovo requires that client users establish brokerage accounts at FOLIOfn Investments, Inc., a FINRA member broker dealer. Quovo has negotiated an annual brokerage fee of 0.35% for each client account maintained at FOLIOfn. A minimum fee charged by FOLIOfn of \$100 per account applies, as well as fees for wire transfers and other administration.

Quovo has selected FOLIOfn based on its reputation, pricing schedule and execution capabilities. Quovo will regularly monitor the execution capabilities of Foliofn in effecting securities transactions, and seek best execution for client users accordingly. FOLIOfn does not however permit Quovo to trade client accounts through other brokers and to settle such trades into FOLIOfn accounts. Quovo's ability to achieve best execution by receiving

multiple quotes from various brokers is therefore limited and best execution may not be achieved. Clients should understand that by receiving services from Quovo that Quovo will execute all securities transaction through FOLIOfn.

Client transactions for accounts with the same investment strategy are generally executed at the same time and receive equal pricing. Client accounts may be traded separately from other similarly managed accounts for cash management purposes or to accommodate reasonable investment restrictions that may affect pricing of securities transactions.

APPENDIX A: FINANCIAL STATEMENTS

Because Quovo follows the custody procedures described above, and does not require prepayment of fees, we are not required to include a balance sheet with this Form ADV.