

Part 2B of Form ADV: *Brochure Supplement*

Item 1 Cover Page

Kevin P. Sullivan
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This brochure supplement provides information about Kevin P. Sullivan that complements the Sullivan & Associates brochure. You should have received a copy of that brochure. Please contact us at 719-576-4500 if you did not receive the Sullivan & Associate's brochure or if you have any questions about the contents of this supplement.

Additional information about Kevin P. Sullivan is available on the SEC's website at www.adviserinfo.sec.gov. Kevin Sullivan's CRD Number is 2373459.

Item 2 Educational Background and Business Experience

Kevin Sullivan (YOB: 1975) received his B.S. degree in Finance and Information Systems from the University of Colorado at Boulder in 1997. Mr. Sullivan is a Chartered Financial Analyst (“CFA”), Certified Financial Planner® (“CFP®”) and a Certified Investment Management Consultant (“CIMC”). Additionally, Mr. Sullivan holds the Series 7 (General Securities Representative), Series 24 (General Securities Principal), and Series 51 (Municipal Fund Securities Principal) FINRA licenses and the Series 31 (Futures Managed Funds Examination) and Series 63 (Uniformed Securities Agent State Law Examination) licenses. He also has his Colorado Resident Producer Life, Variable Products, Accident, and Health license.

In order to obtain the CFP® designation, one must adhere to certain standards. The current requirements include: a bachelor’s degree, three (3) years of full time relevant work experience, passing a rigorous examination, ongoing completion of continuing education, and meeting the CFP Board’s ethics standards. In order to become a CIMC, one must pass a rigorous examination, complete ongoing continuing education, and meet Investment Management Consultants Associations’ ethical standards.

The Chartered Financial Analyst (“CFA”) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients’ interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today’s quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including

ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

In order to obtain Mr. Sullivan's other noted licenses, a person must study and pass a rigorous examination for each license. Additionally, a person is subject to training requirements.

Business Background:

August 1997 to August 1999 - Mr. Sullivan worked for the Process group of Andersen Consulting, LLC.

August 1999 to present - Mr. Sullivan works as a financial planner and Registered Representative for Raymond James Financial Services and has served as Co-Branch Manager since June 2008.

Item 3 Disciplinary Information

Mr. Kevin Sullivan does not have any disciplinary history.

Item 4 Other Business Activities

Securities Brokerage

Kevin Sullivan, in his individual capacity as Registered Representatives of Raymond James Financial Services, Inc., may be paid fees and/or commissions on securities transactions, which represents a conflict of interest.

Insurance Broker/Agent

Sullivan & Associates and Kevin Sullivan may have insurance company affiliations from which they receive commissions, which represents a conflict of interest. Clients are under no obligation to execute recommendations relating to insurance and/or annuity products through the Adviser.

Investment Adviser Representative Raymond James Financial Services Advisors, Inc. ("RJFSA")

Kevin Sullivan may also be registered with RJFSA as an IAR. IARs may provide services for programs which are administered by RJA as an IAR under RJFSA and receive compensation, which represents a conflict of interest.

Board of Directors- Non-Profit Organizations

From time to time the Mr. Sullivan may sit on the Boards of non-profit organizations on a voluntary basis without compensation, which represents a conflict of interest. Currently Kevin Sullivan sits on the board of Disability Services, Inc. and the Stewardship Committee for Pike's Peak United Way.

However, the Adviser has created a Code of Ethics and policies and procedures to address conflict of interests, as noted in this section, to ensure that all IARs place Client's interest ahead of their own as required by their fiduciary duty. To read more about the Adviser's Code of Ethics, please see *Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading* of the Firm Brochure.

Kevin Sullivan spends approximately 25% of his time on all the above activities.

Item 5 Additional Compensation

From time to time Mr. Kevin Sullivan may receive compensation in the form of commissions from the activities disclosed in Item 4 above. These are conflicts of interest, Sullivan & Associates and Mr. Sullivan endeavor at all times to put the interests of its investment advisory Clients first. Clients should be aware, however, that the receipt of economic benefits by Sullivan & Associates or Mr. Sullivan in and of itself creates a potential conflict of interest. However, the Adviser mitigates these conflicts with a Code of Ethics and policies and procedures to ensure that all IARs place Client's interest ahead of their own as required by their fiduciary duty. To read more about the Adviser's Code of Ethics, please see *Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading* of the Firm Brochure.

Mr. Kevin Sullivan does not pay for or receive compensation for client referrals.

Item 6 Supervision

As the owner of Sullivan & Associates, Mr. Patrick Sullivan is ultimately responsible for any advice rendered to Clients. In this capacity, Patrick Sullivan is responsible for the supervision of Kevin Sullivan.

Patrick Sullivan received his B.S. degree in Business Administration from the University of Maryland in 1974 and his M.B.A. from Pepperdine University in 1977. Mr. Sullivan is a Certified Financial Planner® ("CFP®") and formerly a Certified Investment Management Consultant. Additionally, Mr. Sullivan holds the Series 7 (General Securities Representative), Series 24 (General Securities Principal), and Series 53 (Municipal Securities Principal) FINRA licenses and the Series 31 (Futures Managed Funds Examination) and Series 63 (Uniformed Securities Agent State Law Examination) licenses. Any questions regarding Kevin Sullivan's activities should be directed to Patrick Sullivan at 719-576-4500.

Item 7 Requirements for State-Registered Advisers

Mr. Kevin Sullivan does not have any disciplinary history.