

Wrap Fee Program Brochure

November 27, 2012

Tandragee Global Advisors Wrap Program

Sponsored By



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This brochure provides information about the qualifications and business practices of Rose Capital Advisors, a d/b/a of Tandragee Global Advisors, LLC (hereinafter "Tandragee GA" or the "firm"). If you have any questions about the contents of this brochure, please contact Joseph P. Mara at (561) 578-5974. 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 Tandragee GA is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Tandragee GA is a state registered investment adviser. Registration does not imply any level of skill or training.

Item 2. Material Changes

In this Item, Tandragee GA is required to discuss the material changes that have occurred since the firm's last amendment to the Wrap Fee Program Brochure. As this is the initial version of this brochure, there are no such material changes to report.

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Item 4. Services, Fees and Compensation

The Tandragee Global Advisors Wrap Program (the “Program”) is an investment advisory program offered through Rose Capital Advisors, a division of Tandragee GA.

This Brochure describes the business of Tandragee GA as it relates to clients receiving services through the Program. Certain sections also describe the activities of the Firm’s *Supervised Persons*, which refer to any officers, partners, directors (or other person occupying a similar status or performing similar functions), employees, or other persons who provide investment advice on Tandragee GA’s behalf and are subject to the Firm’s supervision.

In addition to the Program, the Firm also provides asset management, financial planning, and investment consulting services under different arrangements than those described herein. Information about these services is contained in Tandragee GA’s Disclosure Brochure, which appears as Part 2A of the firm’s Form ADV.

Description of the Program

The Program is offered as a wrap fee program, which provides clients with the ability to trade in certain investment products without incurring separate brokerage commissions or transaction charges. A wrap fee program is considered any arrangement under which clients receive investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and the execution of client transactions for a specified fee or fees not based upon transactions in their accounts.

Prior to receiving services through the Program, clients are required to enter into a written agreement with Tandragee GA setting forth the relevant terms and conditions of the advisory relationship (the “*Agreement*”). Clients must also open a new securities brokerage account and complete a new account agreement with Fidelity Institutional Wealth Services (“*Fidelity*”) or another broker-dealer Tandragee GA approves under the Program (collectively “*Financial Institutions*”).

At the onset of the Program, clients complete an investor profile describing their individual investment objectives, liquidity and cash flow needs, time horizon and risk tolerance, as well as any other factors pertinent to their specific financial situations. After an analysis of the relevant information, Tandragee GA assists its clients in developing an appropriate strategy for managing their assets. Clients’ investment portfolios are generally managed on a discretionary or non-discretionary basis by either Tandragee GA’s Principal and/or investment adviser representatives or an independent investment manager (collectively “*Independent Managers*”), as recommended or selected by Tandragee GA. Tandragee GA and/or the *Independent Managers* generally allocate clients’ assets among the various investment products available under the Program, as described further in Item 6 (below).

Fees for Participation in the Program

Investment management services are offered through the Program on a fee basis, meaning that clients pay a single annualized fee based upon assets under management. The Firm also offers advisory services outside of the Program under different fee arrangements than those discussed below.

Tandragee GA's asset based fee generally varies between 50 and 150 basis points (0.50% – 1.00%), depending upon the amount of the assets being managed under the Program and the type of investment management services rendered

This fee is prorated and billed quarterly in advance, based upon the average daily balance of the assets being managed by Tandragee GA during the previous quarter, as valued by Envestnet, a third-party service provider the Firm has engaged to perform various back office functions ("Envestnet"). Since the fee is determined by average daily account balance, if assets are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is adjusted accordingly. .

For the initial term of the Program, the fee is calculated on a *pro rata* basis. In the event the *Agreement* is terminated, the fee for the final billing period is prorated through the effective date of the termination and the unearned portion is refunded to the client, as appropriate.

Fee Comparison

A portion of the fees paid to Tandragee GA are used to cover the securities brokerage commissions and transactional costs attributed to the management of its clients' portfolios, as well as the fees charged by the *Independent Managers* engaged to provide services under the Program. *Independent Managers* servicing accounts through the Program receive a fee based upon the assets under their management, which generally ranges up to half of the fees paid to Tandragee GA for participation in the Program.

A portion of the fees paid to Tandragee GA are used to cover the securities brokerage commissions and transactional costs attributed to the management of its clients' portfolios.

Services provided through the Program may cost clients more or less than purchasing these services separately. The number of transactions made in clients' accounts, as well as the commissions charged for each transaction, determines the relative cost of the Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. Fees paid for the Program may also be higher or lower than fees charged by other sponsors of comparable investment advisory programs.

Fee Discretion

Tandragee GA, in its sole discretion, may negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets

to be managed, related accounts, account composition, pre-existing client relationship, account retention and *pro bono* activities.

Fee Debit

The firm's *Agreement* and the separate agreement with any *Financial Institutions* generally authorize Tandragee GA and/or the *Independent Managers* to debit its clients' accounts for the amount of the Program fee and to directly remit that fee to Tandragee GA or the *Independent Managers*. Any *Financial Institutions* recommended by Tandragee GA have agreed to send statements to clients not less than quarterly indicating all amounts disbursed from the account, including the amount of Program fees paid directly to Tandragee GA. Alternatively, clients may elect to have Tandragee GA send them an invoice for payment.

Account Additions and Withdrawals

Clients may make additions to and withdrawals from their account at any time, subject to Tandragee GA's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets on notice to Tandragee GA, subject to the usual and customary securities settlement procedures. However, Tandragee GA designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. Tandragee GA may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Other Charges

Clients may incur certain charges imposed by third parties in addition to the Program fee. These additional charges may include fees charged by the *Independent Managers*, charges imposed directly by a mutual fund or exchange-traded fund ("ETF") in the account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Compensation for Recommending the Program

Tandragee GA has no internal arrangements in place whereby persons recommending the Program are entitled to receive additional compensation as a result of clients' participation.

Item 5. Account Requirements and Types of Clients

Tandragee GA provides its services through the Program to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

No Minimum Account Requirements

Tandragee GA does not impose a stated minimum fee or minimum portfolio value for participation in the Program. Certain *Independent Managers* may, however, impose more restrictive account requirements and varying billing practices than Tandragee GA. In these instances, Tandragee GA may alter its corresponding account requirements and/or billing practices to accommodate those of the *Independent Managers*.

Item 6. Portfolio Manager Selection and Evaluation

Clients' investment portfolios are managed either directly by Tandragee GA or through the use of certain *Independent Managers*, as referenced above.

Portfolio Management

Tandragee GA manages its clients' investment portfolios on a discretionary or non-discretionary basis.

For accounts managed through the Program, Tandragee GA primarily allocates assets among various mutual funds, ETFs, individual debt and equity securities, and options, as well as other *Independent Managers*. In addition, Tandragee GA may also recommend that clients who qualify as accredited investors, as defined under Rule 501 of the Securities Act of 1933, invest in private placement securities, which may include debt, equity and/or pooled investment vehicles (e.g., hedge funds). The Firm also provides advice about any type of legacy position or investment otherwise held in its clients' portfolios.

Clients may also engage Tandragee GA to advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts, and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, Tandragee GA directs or recommends the allocation of client assets among the various investment options available with the product. Client assets are generally maintained at the underwriting insurance company or the custodian designated by the product's provider.

Tandragee GA tailors its advisory services to accommodate the needs of its individual clients and continuously seeks to ensure that its clients' portfolios are managed in a manner consistent with their specific investment profiles. Clients are advised to promptly notify Tandragee GA if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if

Tandragee GA determines, in its sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to the Firm's management efforts.

Tandragee GA manages investment portfolios through the Program in substantially the same manner as those it manages outside of the Program. In return for these services, Tandragee GA receives a portion of the fees paid for participation in the Program, as described in Item 4.

Selection or Recommendation of Independent Managers

Tandragee GA evaluates various information about the *Independent Managers* in which it recommends or selects to manage client portfolios under the Program. The firm generally reviews a variety of different resources, which may include the *Independent Managers'* public disclosure documents, materials supplied by the *Independent Managers* themselves, and other third-party analyses it believes are reputable. To the extent possible, the firm seeks to assess the *Independent Managers'* investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposures. Tandragee GA also takes into consideration each *Independent Manager's* management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other related factors.

Tandragee GA generally monitors the performance of those accounts being managed by *Independent Managers* by reviewing the account statements and trade confirmations produced by the *Financial Institutions*, as well as other performance information furnished by the *Independent Managers* and/or other third-party providers. The Firm does not verify the accuracy of any such performance information and does not ensure its compliance with presentation standards. Clients are advised that any performance information they receive from the *Independent Managers* may not be calculated on a uniform and consistent basis. Clients should compare all supplemental materials with the account statements they receive from their respective custodians.

The terms and conditions under which the client engages an *Independent Manager* are set forth in a separate written agreement between Tandragee GA or the client and the designated *Independent Manager*. In addition to this Brochure, the client also receives the written disclosure brochure of the designated *Independent Managers* engaged to manage their assets.

Side-By-Side Management

Tandragee GA does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

Methods of Analysis

Tandragee GA employs a largely bottom-up, fundamental approach to analyzing investments, while incorporating a series of technical indicators to assess buy and sell opportunities.

Fundamental analysis involves an evaluation of an issuer's fundamental financial condition and competitive position. Tandragee GA generally analyzes the financial condition, capabilities of management, earnings capacity, new products and services, as well as the company's markets and position amongst its industry competitors in order to determine the recommendations made to clients. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

Technical analysis involves the examination of past market data rather than specific company information in determining the recommendations made to clients. Technical analysis may involve the use of mathematical based indicators and charts, such as moving averages and price correlations, to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. A substantial risk in relying upon technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Tandragee GA will be able to accurately predict such a reoccurrence.

Investment Strategies

Tandragee GA's approach to investing is premised on the evaluation and selection of strong portfolio managers, rather than the active trading of individual securities. When building a portfolio for a client, the Firm looks to issuers and companies that illustrate a strong fundamental position across the board, while also considering external capital market factors, such as interest rate cycles and general economic outlook, which play a significant part in the duration of a security.

While Tandragee GA seeks to remain agnostic to industry trends, there are three important parameters in the buy/sell determination:

1. The present to historical evaluation of book value;
2. The strength of present to historical market niche of key products; and
3. The price of a security to present cash flow generation

The firm tends to avoid highly leveraged balance sheets, boards that pay executives excessively while firing employees and cutting back on services to customers, and other characteristics that appear to illustrate instability and mismanagement.

Risks of Loss

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

Market Risks

The profitability of a significant portion of Tandragee GA' recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that Tandragee GA will be able to predict those price movements accurately.

Mutual Funds and Exchange-Traded Funds (ETFs)

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their *pro rata* NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Options

Options allow investors to buy or sell a security at a contracted strike price (not necessarily the current market price) at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge against potential losses or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase or decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

Use of Independent Managers

Tandragee GA may recommend the use of *Independent Managers*. In these situations, Tandragee GA continues to do ongoing due diligence of such managers, but such recommendations rely to a great extent on the *Independent Managers'* ability to successfully implement their investment strategies. In addition, Tandragee GA generally may not have the ability to supervise the *Independent Managers* on a day-to-day basis.

Use of Private Collective Investment Vehicles

Tandragee GA recommends that certain clients invest in privately placed collective investment vehicles (e.g., hedge funds, private equity funds, etc.). The managers of these vehicles have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. Hedge funds may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because the vehicles are not registered as investment companies, there is an absence of regulation. There are numerous other risks in investing in these securities. Clients should consult each fund's private placement memorandum and/or other documents explaining such risks prior to investing.

Voting of Client Securities

Tandragee GA does not accept the authority to vote clients' securities (i.e., proxies) on their behalves. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the firm at the number listed on the cover of this brochure with questions about proxies and/or other such solicitations.

Item 7. Client Information Provided to Portfolio Managers

In this Item, Tandragee GA is required to describe the type and frequency of the information it communicates to the *Independent Managers*, if any, managing its clients' investment portfolios. Clients participating in the Program generally grant Tandragee GA the authority to discuss certain non-public information with the *Independent Managers* engaged to manage their accounts. Depending upon the specific arrangement, the Firm may be authorized to disclose various personal information including, without limitation: names, phone numbers, addresses, social security numbers, tax identification numbers and account numbers. Tandragee GA may also share certain information related to its clients' financial positions and investment objectives in an effort to ensure that the *Independent Managers'* investment decisions remain aligned with its clients' best interests. This information is communicated on an initial and ongoing basis, or as otherwise necessary to the management of its clients' portfolios.

Item 8. Client Contact with Portfolio Managers

In this Item, Tandragee GA is required to describe any restrictions on clients' ability to contact and consult with the portfolio managers managing their investment portfolios. There are no restrictions on clients' ability to correspond with Tandragee GA. Clients can generally contact the *Independent Managers* managing their portfolios through Tandragee GA by providing the Firm with written request and identification of the questions or issues to be discussed with the *Independent Managers*. After receiving the client's written request, Tandragee GA, at its sole discretion, may contact the *Independent Managers* for the client or arrange for the *Independent Managers* and the client to communicate directly.

Item 9. Additional Information

Disciplinary Information

Tandragee GA has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management.

Other Financial Industry Activities and Affiliations

Registered Representatives of a Broker-Dealer

Certain of the Firm's *Supervised Persons* are registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKSI") Spire Securities, LLC ("*Spire*") and may provide clients with securities brokerage services under a separate commission-based arrangement. A conflict of interest exists to the extent that Tandragee GA recommends the purchase of a security and its *Supervised Person* receives a portion of the commissions paid to PKSI or *Spire*. Tandragee GA has procedures in place to ensure that all recommendations are made in the best interests of clients regardless of any additional compensation earned. For accounts covered by ERISA (and such others that Tandragee GA, in its sole discretion, deems appropriate), the Firm provides investment advisory services on a fee offset basis. In this scenario, Tandragee GA may offset its fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Firm's *Supervised Persons* in their capacities as registered representatives of PKSI or *Spire*.

Affiliated Institutional Consulting Firm

Tandragee GA is under common ownership and control with Tandragee Capital Management, LLC ("*TCM*"), an institutional consulting firm that provides business development services to asset managers, registered investment advisers, pension funds, for-profit entities, and not-for-profit entities. *TCM* may provide services to, or have other business relationships with, certain of the *Independent Managers* engaged to manage the investment portfolios of the Firm's advisory clients. These types of arrangements may give rise to a potential conflict of interest in that there may exist a financial incentive to recommend

one *Independent Manager* over another. Tandragee GA seeks to ensure that all investment decisions are aligned with its clients' best interests.

Code of Ethics

Tandragee GA and persons associated with Tandragee GA ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with Tandragee GA's policies and procedures.

Tandragee GA has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("*Code of Ethics*"). Tandragee GA's *Code of Ethics* contains written policies reasonably designed to prevent the unlawful use of material non-public information by Tandragee GA or any of its associated persons. The *Code of Ethics* also requires that certain of Tandragee GA's personnel (called "*Access Persons*") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

When Tandragee GA is engaging in or considering a transaction in any security on behalf of a client, no *Access Person* may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the *Access Person*) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the *Access Person* is completed as part of a batch trade (as defined below in Item 12) with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

This *Code of Ethics* has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by *Access Persons* to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated above.

Clients and prospective clients may contact Tandragee GA to request a copy of its *Code of Ethics*.

Account Reviews

Tandragee GA monitors its clients' investment portfolios on a continuous and ongoing basis, and conducts regular account reviews at least quarterly. Such reviews are conducted by one of the Firm's investment adviser representatives of by the Firm's Principal. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Tandragee GA and to keep Tandragee GA informed of any changes thereto. Tandragee GA contacts ongoing investment advisory clients at least annually to review its previous services and recommendations, and to discuss the impact resulting from any changes in their financial situation and/or investment objectives.

Account Statements and General Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the *Financial Institutions*. Clients in the Program also receive reports from Tandragee GA that may include relevant account and/or market-related information, such as an inventory of account holdings and account performance as clients may request from time to time. Clients should compare any supplemental reports they receive from Tandragee GA and/or the *Independent Managers* with the account statements they receive from the *Financial Institutions*.

Client Referrals

Tandragee GA does not compensate any unaffiliated third-party for referring clients to the Program.

Receipt of Economic Benefit

Tandragee GA has arrangements in place whereby the Firm receives an economic benefit from a third-party for providing investment advice to clients participating in the Program. Specifically, *PKSI* or *Spire* may provide the Firm with computer software and related systems support, which allow Tandragee GA to better monitor client accounts maintained at *PKSI* or *Spire*. Tandragee GA may receive the software and related support without cost because Tandragee GA renders investment management services to clients that maintain assets at *PKSI* or *Spire*. The software and related systems support may benefit Tandragee GA, but not its clients directly. In fulfilling its duties to its clients, Tandragee GA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Tandragee GA's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence Tandragee GA's choice of broker-dealer over another that does not furnish similar software, systems support, or services.

Software and Support Provided by Financial Institutions

Tandragee GA may receive from *Fidelity*, without cost to Tandragee GA, computer software and related systems support, which allow Tandragee GA to better monitor client accounts maintained at *Fidelity*. Tandragee GA may receive the software and related support without cost because Tandragee GA

renders investment management services to clients that maintain assets at *Fidelity*. The software and related systems support may benefit Tandragee GA, but not its clients directly. In fulfilling its duties to its clients, Tandragee GA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Tandragee GA's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence Tandragee GA's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Additionally, Tandragee GA may receive the following benefits from *Fidelity* through the Fidelity Institutional Wealth Services Group:

- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its Institutional Wealth Services Group participants;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and
- Access to an electronic communication network for client order entry and account information.

Financial Information

Tandragee GA is not required to disclose any financial information pursuant to this Item due to the following:

- The firm does not require or solicit the prepayment of more than \$500 in fees six months or more in advance;
- The firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The firm has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 10. Requirements for State Registered Investment Advisers

Principal Executive Officers and Management Persons

Below is the formal education and business background of each of Tandragee GA's principal executive officers and management persons:

JOSEPH P. MARA

Born 1951

Post-Secondary Education

University at Albany, State University of New York | MA, Educational Communications | 1977

Queen's University | BSC, Honors Biology | 1974

Recent Business Background

Tandragee Global Advisors, LLC | President | February 2012 – Present

Purshe Kaplan Sterling Investments | Representative | January 2012 – Present

Fairholme Capital Management | Director of Business Development | June 2006 – December 2011

PFPC Distributors, Inc. | Registered Representative | May 2009 – December 2009

Quasar Distributors, Inc. | Registered Representative | April 2007 – March 2009

Citigroup Global Markets Inc. | SVP-Investments & Portfolio Manager | March 1994 – June 2006

TANDRAGEE

TANDRAGEE GLOBAL ADVISORS

Prepared by:



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The Adviser's Advisor®