



Vision Capital Partners, Inc.

Form ADV Part 2A – Disclosure Brochure

Effective: December 15, 2015

This Disclosure Brochure provides information about the qualifications and business practices of Vision Capital Partners, Inc. ("VCP"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (248) 735-8470.

VCP is a registered investment advisor located in the State of Michigan. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through VCP to assist you in determining whether to retain the Advisor.

Additional information about VCP and its advisory persons are available on the SEC's website at www.adviserinfo.sec.gov by searching with our firm name or with our firm's CRD# **175147**.

Vision Capital Partners, Inc.
CRD No: 175147
21500 Haggerty Road, Suite 160
Northville, MI 48167
Phone: (248) 735-8470 * Fax: (248) 735-8471
<http://www.visioncapitalpartners.com/>

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of VCP.

VCP believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. VCP encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

There have been no material changes to this Disclosure Brochure since the last distribution to Clients.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of VCP.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or with our CRD# **175147**.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (248) 735-8470.

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Item 4 – Advisory Services

A. Firm Information

Vision Capital Partners (“VCP” or the “Advisor”) is a registered investment advisor located in the State of Michigan, which is organized as a Corporation under the laws of the State of Michigan. VCP was founded in 2006, is operated by Thomas Duncan, President and Julie Quick, Chief Compliance Officer, and owned by Mr. Duncan. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by VCP.

B. Advisory Services Offered

VCP offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, and businesses in State of Michigan and other states (each referred to as a “Client”).

Investment Management Services

VCP provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. VCP works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. VCP will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds, certificates of deposit, municipal securities, options, united states government bonds and other securities to meet the needs of its Clients.

VCP’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. VCP will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

VCP evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. VCP may recommend, on occasion, redistributing investment allocations to diversify the portfolio. VCP may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. VCP may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

Prior to rendering investment advisory services, VCP will ascertain, in conjunction with the Client, the Client’s financial situation, risk tolerance, and investment objective[s].

VCP will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will VCP accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

Managed Account Programs

VCP may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in a managed accounts program at the Client’s selected custodian (the “Program Sponsor”). The Client will then enter into a program and investment advisory agreement with the Program Sponsor and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account, the selection of the money manager[s], and defining any restrictions on the account. VCP will continue to provide oversight of the Client account and ongoing monitoring of the activities of the unaffiliated money managers.

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These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add VCP's Investment Advisory Fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. The asset-based program fee is tiered and varies depending on the size of the account, the asset class of the underlying securities and the sub-advisor selected. The overall fee (including the Advisor's Investment Advisory Fee) will not exceed 3% annually.

VCP does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than VCP's Investment Advisory Fee (described in Item 5).

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2 (or a brochure that makes the appropriate disclosures). In addition, VCP and its Client will agree in writing that that selected Program Sponsor will manage the Client's account on a discretionary basis.

Specifically, VCP may recommend Clients invest assets into comprehensive fee-based brokerage accounts managed through Triad Advisors, Inc. ("Triad"). Triad offers fee-based accounts with different characteristics depending on the needs of the Client. Investors should note that certain employees of VCP are also registered representatives of Triad Advisors, Inc.

Financial Planning and Consulting Services

VCP will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning or Consulting Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. VCP may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

Defined Contribution Plans

VCP will provide investment management and financial planning services to the sponsors and participants of "qualified retirement plans" as defined under the Employee Retirement Income Security Act of 1974 ("ERISA"), herein referred to as the "Plans". VCP is typically engaged to provide advice and guidance on the structure,

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investments and/or the ongoing investment management of a Plan. Based on this evaluation, VCP will make objective recommendations to the Plan Sponsor. As part of its process, VCP will provide an investment policy statement, which shall outline the goals for investment management and monitoring Plan investments.

Other Services

In conjunction with financial planning and consulting, the Advisor may assist individuals, families, and corporations and with various services for a fee, pursuant to a written Wealth Management Agreement. VCP offers corporations business succession planning, assistance with executive compensation and other services. In addition, the Advisor offers individuals and families Family Offices Services, which include consolidated performance reporting on multiple accounts, bill pay assistance, family education, and assistance with governance issues including facilitating family meetings.

C. Client Account Management

Prior to engaging VCP to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – VCP, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – VCP will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – VCP will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – VCP will provide investment management and ongoing oversight of the Client's portfolio and overall account.

D. Wrap Fee Programs

VCP does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by VCP.

E. Assets Under Management

As of September 30, 2015 the most recent date for which such calculations are provided pursuant to securities regulations, VCP manages the following assets:

| Assets Under Management | Assets |
|--------------------------|---------------|
| Discretionary Assets | \$27,782,461 |
| Non-Discretionary Assets | \$72,580,351 |
| Total | \$100,362,812 |

Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of VCP and the Client.

A. Fees for Advisory Services

Investment Management

Investment advisory fees are paid quarterly in advance pursuant to the terms of the investment advisory agreement.

Investment advisory fees are based on the market value of assets under management at the end of each calendar quarter. Investment advisory fees range from 0.40% to 1.85% based on the following schedule:

| Assets Under Management | Annual Rate |
|--------------------------------|--------------------|
| \$0 to \$500,000 | 1.85% |
| \$500,000 to \$1,000,000 | 0.90% |
| \$1,000,000 to \$4,000,000 | 0.60% |
| \$4,000,000 and Over | 0.40% |

Investment advisory fees in the first quarter of service are prorated from the inception date of the account to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by VCP will be independently valued by the designated Custodian. VCP will not have the authority or responsibility to value portfolio securities.

Triad Advisors, Inc.

Investment advisory fees invested in the Triad accounts range from 0.25% to 2.75% depending on the size and complexity of the Client relationship. Fees are paid quarterly in advance pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of each calendar month.

Managed Accounts Programs

Fees for Clients participating in managed accounts programs will include VCP's Investment Advisory Fee above plus the Program Sponsors Fee.

Financial Planning and Consulting Services

VCP offers financial planning or consulting services on an hourly basis ranging from \$100 to \$300 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

In addition, VCP offers financial planning or consulting services on a fixed fee basis ranging from \$3,000 to \$25,000 which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

Defined Contribution Plans

Pursuant to the terms of the investment advisory agreement with each Plan Sponsor, the Advisor will receive an investment advisory fee, billed quarterly in advance of each quarter based on the value of the Plan assets under advisement on the last day of the prior quarter. Fees are charged at an annual rate ranging from 0.25% to 2.75% of Plan assets annually.

Other Services

VCP offers services to individuals, families, and corporations. In some instances the Advisor charges fixed fees on a transactional or periodic basis, and other instances the Advisor charges basis points, depending on the nature and complexity of the arrangement. From time-to-time the Advisor may also charge hourly fees for these services. The fees are determined after considering many factors and are agreed to prior to entering into an agreement with the Client.

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The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

B. Fee Billing

Investment Management

Investment advisory fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with VCP at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting VCP to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Triad Advisors, Inc.

Investment advisory fees will be automatically deducted from the Client Account by the Custodian. Generally Triad sends an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective month end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with VCP at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee.

For both the Account Portfolio Management and Triad Investors, Inc. assets, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting VCP or the unaffiliated investment advisor to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Managed Accounts

Clients participating in a managed accounts program or referred to unaffiliated money managers or investment advisors will be billed in accordance to the investment advisory agreement with the respective Program Sponsor or advisor. Program Sponsors will add VCP's investment advisory fee and deduct the overall fee from the Client's account[s]. In situations where a Client is referred to an unaffiliated investment advisor, the investment advisor will collect its fee and compensate VCP out of its fee. Details are described in Item 14 below.

Financial Planning and Consulting Services

Financial planning and consulting fees are invoiced upon execution of the Financial Planning and Consulting Agreement, and are completed in less than six months.

Defined Contribution Plans

Fees are automatically deducted from the Plan accounts by the Plan Administrator as directed by the Plan Sponsor. Clients receive participant statements at least quarterly from the Plan Sponsor and/or Plan Administrator.

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Other Services

Fees for other services may be billed in advance or in arrears depending on the type of engagement. The terms are agreed to in advance and are based on the needs of the Client.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than VCP, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The investment advisory fee charged by VCP is separate and distinct from these custodian and execution fees.

In addition, all fees paid to VCP for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of VCP, but would not receive the services provided by VCP which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by VCP to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Investment Management

VCP is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their investment advisory agreement with VCP, in whole or in part, by providing advance written notice. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's written approval.

Triad Advisors, Inc.

For the Triad accounts, VCP is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their investment advisory agreement, in whole or in part, by providing advance written notice. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without Client's written approval.

Managed Accounts Programs

In the event that a Client should wish to terminate their relationship with a managed accounts program or unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. VCP will assist the Client with the termination and transition as appropriate.

Financial Planning and Consulting Services

Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro rata basis.

Other Services

Fees for other services may be billed in advance or in arrears depending on the type of engagement. In the event the Client would like to terminate this arrangement any prepaid fees, which are the result of collecting a deposit will be returned to the Client within 5 business days.

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E. Compensation for Sales of Securities

VCP does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Item 6 – Performance-Based Fees and Side-By-Side Management

VCP does not charge performance-based fees for its investment advisory services. The fees charged by VCP are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

VCP does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

VCP provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- 501(c)(3) Non-Profit Organizations – mission-based, non-profit organizations
- Corporations and Businesses – taxable business entities, investing cash reserves

The relative percentage of each type of Client is available on VCP’s Form ADV Part 1. These percentages will change over time. VCP generally does not impose a minimum account size for establishing a relationship.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

VCP primarily employs modern portfolio theory in developing investment strategies for its Clients. Research and analysis from VCP is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, VCP generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. VCP will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, VCP may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. VCP will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

VCP structures strategically designed portfolios using the principles of Modern Portfolio Theory (“MPT”). MPT is an investment methodology that suggests that investors may benefit from having a portfolio of holdings invested in a variety of assets classes. To the extent that these asset classes are non-correlated, the portfolio will experience investment returns with mitigated risk. VCP constructs Client investment portfolios based upon the premise that asset allocation models can be developed using historical performance data and academically tested assumptions about the future. This information can be used to optimize the risk-adjusted expected rate of return of a given portfolio.

While VCP performs an analysis to determine the asset classes are not correlated, it does not mitigate all of the risk. Investment prices that do not appear correlated may in fact be correlated and the portfolio could lose value.

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It is important to point out that while the analysis assists the Advisor in selecting investments, it does not guarantee a positive return. More details on the Advisor's review process are included in Item 13.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

VCP may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. VCP may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. VCP's investment strategy encompasses active trading in concentrated portfolios. Following are some of the risks associated with Options, Margin and Short-Sale transactions:

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (248) 735-8470.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving VCP or any of its employees. VCP and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

To review the firm information contained in Form ADV Part 1, select the option for "Investment Adviser Search", then selecting "Firm" and enter **175147** in the field labeled "Firm Name or CRD# or SEC#". This will provide access to Form ADV Parts 1 and 2. Item 11 of the Form ADV Part 1 lists legal and disciplinary disclosure questions.

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Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Certain advisory persons may also be a registered representative of Triad Advisors, Inc of Norcross, Georgia. Triad Advisors, Inc. is a registered broker-dealer (CRD No. 25803), member FINRA, SIPC. In their separate capacity as a registered representative, the advisory person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the advisory person. Neither the Advisor nor the advisory person will earn investment advisory fees in connection with any services implemented in the advisory person's separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by VCP to its Clients are implemented by the advisory person in their role as an investment advisory representative, not in their role as a registered representative. As such, Clients of VCP will only pay advisory fees as described above. In no circumstances will VCP earn an advisory fee and a commission on the same investment. In the event that the advisory person earns a commission on an investment, the advisory fee will be waived by VCP.

Insurance Agency Affiliations

Certain advisory persons may also serve as an insurance professional. This activity is done separate and apart from her role with VCP. As an insurance professional, the advisory person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the advisory person or the Advisor.

Managed Accounts

As noted in Item 4, the Advisor may select unaffiliated money managers to assist with the implementation of a Client's investment strategy. In such arrangements, the Advisor will receive a portion of the investment advisory fees collected by the unaffiliated money managers from the Client. The Advisor will not charge its own investment advisory fee for assets referred to an unaffiliated money manager.

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

A. Code of Ethics

VCP has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with VCP. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. VCP and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of VCP associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (248) 735-8470.

B. Personal Trading with Material Interest

VCP allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. VCP does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. VCP does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

VCP allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities

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reporting procedures. When trading for personal accounts, employees of VCP may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by VCP requiring reporting of personal securities trades by its employees for review by the employee's supervisor or the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

D. Personal Trading at Same Time as Client

While VCP allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards.

At no time will VCP, or any associated person of VCP, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

VCP does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize VCP to direct trades to this custodian as agreed in the investment advisory agreement. Further, VCP does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where VCP does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by VCP.

VCP may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. VCP does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **VCP does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

2. Brokerage Referrals - VCP does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where VCP will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, VCP will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

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B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. VCP will execute its transactions through an unaffiliated broker-dealer selected by the Client. VCP may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by Thomas Duncan. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify VCP if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by VCP

Broker-Dealer Affiliation

Certain advisory persons are also registered representatives of Triad Advisors, Inc. of Norcross, Georgia. Triad Advisors, Inc. is a registered broker-dealer (CRD No. 25803), member FINRA, SIPC. In their separate capacity as a registered representative, employees of the Advisor will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisor. Please see Item 10 Other Financial Industry Activities and Affiliations for additional information.

Insurance Agency Affiliations

Certain advisory persons also serve as sales agent for various insurance companies. This activity is done separate and apart from their role with the VCP. As an insurance agent, the employees may receive customary commissions and other related revenues from the various insurance companies whose products are sold.

B. Client Referrals from Solicitors

VCP does not engage paid solicitors for Client referrals.

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Item 15 – Custody

VCP does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct VCP to utilize that custodian for the Client's security transactions. VCP encourages Clients to review statements provided by the account custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

Item 16 – Investment Discretion

VCP generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by VCP. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by VCP will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

VCP does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither VCP, nor its management, have any adverse financial situations that would reasonably impair the ability of VCP to meet all obligations to its Clients. Neither VCP, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. VCP is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

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Form ADV Part 2B – Individual Disclosure Brochure

for

**Thomas W. Duncan
President**

Effective: December 15, 2015

This Brochure Supplement provides information about the background and qualifications of Thomas W. Duncan (CRD# **4309377**) in addition to the information contained in the Vision Capital Partners (“VCP” or the “Advisor” CRD #141201) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or VCP’s Disclosure Brochure, please contact us at 248-735-8470.

Additional information about Thomas W. Duncan is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

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Item 2 – Educational Background and Business Experience

Thomas W. Duncan is the President of Vision Capital Partners. Mr. Duncan, born in 1970, is dedicated to serving the Clients of Vision Capital Partners. Mr. Duncan earned an MBA from University of Michigan, Ann Arbor in 1999. Mr. Duncan also earned a Bachelor of Business Administration in Accounting and Economics from Harding University in 1992.

In addition, Mr. Duncan is a Certified Public Accountant (“CPA”), although he is not currently in public practice. More information about the CPA designation is included below.

Certified Public Accountant (“CPA”)

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include:

- minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting),
- minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and
- successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education each year (or 80 hours over a two year period or 120 hours over a three year period).

Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA’s Code of Professional Conduct within their state accountancy laws or have created their own.

Additional information regarding Mr. Duncan’s employment history is included below.

Employment History:

| | |
|---|--------------------|
| President, Vision Capital Partners | 06/2015 to Present |
| Registered Representative, Triad Advisors, Inc | 08/2006 to Present |
| Vice President, Vision Capital Partners | 08/2006 to 07/2015 |
| Registered Representative, Lincoln Financial Advisors | 11/2000 to 08/2006 |
| Agent, Lincoln National Life Insurance Company | 11/2000 to 04/2006 |

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Duncan. Mr. Duncan has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Duncan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Duncan.***

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However, we do encourage you to independently view the background of Mr. Duncan on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **4309377** in the field labeled "Individual Name or CRD Number".

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Duncan is also a registered representative of Triad Advisors, Inc. of Norcross, Georgia. Triad Advisors, Inc. is a registered broker-dealer (CRD No. 25803), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Duncan will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Mr. Duncan. Neither the Advisor nor Mr. Duncan will earn investment advisory fees in connection with any services implemented in Mr. Duncan's separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by VCP to its Clients are implemented by Mr. Duncan in his role as an investment advisor representative, not in his role as a registered representative. As such, Clients of VCP only pay only advisory fees as described above. In no circumstances will VCP earn an advisory fee and a commission on the same investment. In the event that Mr. Duncan earns a commission on an investment, the advisory fee will be waived by VCP.

Insurance Agency Affiliations

Mr. Duncan, President of VCP, may serve as sales agent for various insurance companies. This activity is done separate and apart from his role with the VCP. As an insurance agent, Mr. Duncan may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Duncan or the Advisor.

Item 5 – Additional Compensation

Mr. Duncan is also a registered representative of Triad Advisors, Inc. of Norcross, Georgia. Triad Advisors, Inc. is a registered broker-dealer (CRD No. 25803), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Duncan will typically receive commissions for the implementation of recommendations for commissionable transactions.

Mr. Duncan, President of VCP, may serve as sales agent for various insurance companies. This activity is done separate and apart from his role with the VCP. As an insurance agent, Mr. Duncan may receive customary commissions and other related revenues from the various insurance companies whose products are sold.

Item 6 – Supervision

Mr. Duncan serves as the President of VCP and is supervised by Julie Quick, the Chief Compliance Officer. Ms. Quick can be reached at 248-735-8470.

VCP has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of VCP. Further, VCP is subject to regulatory oversight by various agencies. These agencies require registration by VCP and its employees. As a registered entity, VCP is subject to examinations by regulators, which may be announced or unannounced. VCP is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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<http://www.visioncapitalpartners.com/>

Form ADV Part 2B – Individual Disclosure Brochure

for

Julie M. Quick
Chief Compliance Officer

Effective: December 15, 2015

This Brochure Supplement provides information about the background and qualifications of Julie M. Quick (CRD# **4399536**) in addition to the information contained in the Vision Capital Partners (“VCP” or the “Advisor” CRD #141201) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or VCP’s Disclosure Brochure, please contact us at 248-735-8470.

Additional information about Julie M. Quick is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Julie M. Quick is the Chief Compliance Officer of Vision Capital Partners. Ms. Quick, born in 1979, is dedicated to serving the Clients of Vision Capital Partners.

Ms. Quick earned a Bachelors of Business Administration with a major in economics and a minor in finance from Oakland University in 2002. In addition Ms. Quick earned the Certified Financial Planner designation. More information this designation is included below.

About the CFP® Designation

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Additional information regarding Ms. Quick’s employment history is included below.

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Employment History:

| | |
|--|--------------------|
| Chief Compliance Officer, Vision Capital Partners | 06/2015 to Present |
| Registered Representative, Triad Advisors, Inc | 08/2006 to Present |
| Investment Advisor Representative, Vision Capital Partners | 08/2006 to 07/2015 |
| Registered Rep, Lincoln Financial Advisors | 02/2000 to 08/2006 |
| Registered Rep, UBS Paine Webber | 12/2002 to 02/2003 |

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Quick.

Ms. Quick has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Quick.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Quick.***

However, we do encourage you to independently view the background of Ms. Quick on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **4399536** in the field labeled "Individual Name or CRD Number".

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Ms. Quick is also a registered representative of Triad Advisors, Inc. of Norcross, Georgia. Triad Advisors, Inc. is a registered broker-dealer (CRD No. 25803), member FINRA, SIPC. In her separate capacity as a registered representative, Ms. Quick will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Ms. Quick. Neither the Advisor nor Ms. Quick will earn investment advisory fees in connection with any services implemented in Ms. Quick's separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by VCP to its Clients are implemented by Ms. Quick in her role as an Investment Advisor Representative, not in her role as a Registered Representative. As such, Clients of VCP only pay only advisory fees as described above. In no circumstances will VCP earn an advisory fee and a commission on the same investment. In the event that Ms. Quick earns a commission on an investment, the advisory fee will be waived by VCP.

Insurance Agency Affiliations

Ms. Quick, Investment Advisor Representative of VCP, may serve as sales agent for various insurance companies. This activity is done separate and apart from her role with the VCP. As an insurance agent, Ms. Quick may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Quick or the Advisor.

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Item 5 – Additional Compensation

Ms. Quick is also a registered representative of Triad Advisors, Inc. of Norcross, Georgia. Triad Advisors, Inc. is a registered broker-dealer (CRD No. 25803), member FINRA, SIPC. In her separate capacity as a registered representative, Ms. Quick will typically receive commissions for the implementation of recommendations for commissionable transactions.

Ms. Quick, Investment Advisor Representative of VCP, may serve as sales agent for various insurance companies. This activity is done separate and apart from her role with the VCP. As an insurance agent, Ms. Quick may receive customary commissions and other related revenues from the various insurance companies whose products are sold.

Item 6 – Supervision

Ms. Quick serves as the Chief Compliance Officer of VCP. Ms. Quick can be reached at 248-735-8470.

VCP has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of VCP. Further, VCP is subject to regulatory oversight by various agencies. These agencies require registration by VCP and its employees. As a registered entity, VCP is subject to examinations by regulators, which may be announced or unannounced. VCP is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective Date: December 15, 2015

Our Commitment to You

Vision Capital Partners ("VCP" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. VCP (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

VCP does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

| | |
|--|---------------------------------|
| Social security or taxpayer identification number | Assets and liabilities |
| Name, address and phone number(s) | Income and expenses |
| E-mail address(es) | Investment activity |
| Account information (including other institutions) | Investment experience and goals |

What Information do we collect from other sources?

| | |
|---|---|
| Custody, brokerage and advisory agreements | Account applications and forms |
| Other advisory agreements and legal documents | Investment questionnaires and suitability documents |
| Transactional information with us or others | Other information needed to service account |

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

| Basis For Sharing | Do we share? | Can you limit? |
|---|--------------|----------------|
| Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. | Yes | No |
| Marketing Purposes VCP does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where VCP or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes. | No | Not Shared |
| Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s). | Yes | Yes |
| Information About Former Clients VCP does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients. | No | Not Shared |

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (248) 735-8470.

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