

Item 1 – Cover Page

Crowell, Weedon & Co.
624 S. Grand Ave., Suite 2510
Los Angeles, CA 90017
(213)620-1850

www.crowellweedon.com

July 31, 2011

This Brochure provides information about the qualifications and business practices of Crowell, Weedon & Co. If you have any questions about the contents of this Brochure, please contact Audrey Maxwell at (213) 620-1850 or at amaxwell@crowellweedon.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Crowell, Weedon & Co. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” adopting new rules which amend the disclosure document “Brochure” that we provide to clients as required by SEC Rules. Accordingly, this Brochure is materially different in structure and requires certain new information that our previous brochure did not require. In accordance with the new SEC rules, we will ensure that all our current and prospective clients receive the Brochure, in its entirety, by the deadline set forth by the SEC.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Our Brochure is also available on our web site www.crowellweedon.com free of charge.

Item 3 -Table of Contents

| | |
|--|-----|
| Item 1 – Cover Page | i |
| Item 2 – Material Changes | ii |
| Item 3 -Table of Contents..... | iii |
| Item 4 – Advisory Business..... | 1 |
| Item 5 – Fees and Compensation | 5 |
| Item 6 – Performance-Based Fees and Side-By-Side Management | 9 |
| Item 7 – Types of Clients..... | 9 |
| Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss | 9 |
| Item 9 – Disciplinary Information | 11 |
| Item 10 – Other Financial Industry Activities and Affiliations..... | 12 |
| Item 11 – Code of Ethics..... | 14 |
| Item 12 – Brokerage Practices | 15 |
| Item 13 – Review of Accounts | 16 |
| Item 14 – Client Referrals and Other Compensation | 17 |
| Item 15 – Custody | 18 |
| Item 16 – Investment Discretion | 18 |
| Item 17 – Voting Client Securities..... | 18 |
| Item 18 – Financial Information | 19 |
| Privacy Policy | |
| Business Continuity Summary | |
| Brochure Supplement | |

Item 4 – Advisory Business

Firm Description

Crowell, Weedon & Co. (CWCOW) was founded in 1932 as a privately held general partnership. CWCOW is a federally registered investment advisor headquartered in Los Angeles, California, and is dually registered as an investment advisor and broker-dealer. For purposes of this disclosure document, reference will be made to the investment advisor as “CWCOW-IA”, and to the broker dealer as “CWCOW-BD”. CWCOW has 15 branch offices in Southern California:

- Big Bear Lake
- Carlsbad
- Covina
- Dana Point
- El Segundo
- Encino
- Fresno
- La Jolla
- Los Angeles
- Long Beach
- Newport Beach
- Pasadena
- Santa Barbara
- Ventura
- Westlake Village

Crowell, Weedon & Co. is one of the largest independent investment firms in the Western United States. For over 75 years, CWCOW has taken pride in its tradition of investing and providing advice and guidance to enable clients to achieve personal investment success. Clients include individuals, entities, pension and profit-sharing plans, IRA's, 401(k) plans and participants, 403(b)(7) plans and participants, trusts, charitable remainder trusts (CRTs), estates, and not-for-profit organizations. Client portfolios are managed on a discretionary or non-discretionary basis, depending on the needs of the client. The investment management and supervisory services that clients receive depends on the client's individual financial and personal needs, investment objectives, risk tolerance, and time horizon.

Principal Owners

As a privately held general partnership, CWCOW currently has 62 general partners, of which, the Crowell Family members and/or the Crowell Family Trust has more than 25% majority ownership.

Types of Advisory Services

CWCOW-IA offers a variety of investment management programs, which include customized portfolios, Advisor as manager programs, internal asset management programs, outside third party platform providers, separately managed asset programs, and mutual fund fee-based programs. Generally, investment management programs are for investors with a medium to long-term time horizon; however, various programs may be appropriate for certain investors with a short-term time horizon. Different time horizons may exist within a single portfolio.

With the assistance of your IAR, you will select an appropriate program based upon your individual needs. These include, but are not limited to, financial and personal needs, investment objectives, risk tolerance, and time horizon.

Minimum Account Size: Generally, the type of managed program will determine the initial and on-going account balance requirements. For internally managed programs, CWCO-IA may permit you to invest less than the program's initial investment amount or allow you to aggregate multiple account balances to meet the minimum investment amount if CWCO-IA believes, that based on information you provide to your IAR, investing a lower amount is appropriate for you or you have established additional managed accounts with CWCO-IA or the IAR.

Information on Advisor as Manager program

The Advisor as Manager program is an investment management program that enables CWCO-IA's IAR to continuously and actively manage your account in accordance with the your investment policy statement or selected investment strategy. CWCO-IA's IARs may, at your direction, be granted discretion over your account. Funds and securities may be held at CWCO-BD, Pershing, Schwab, TD Ameritrade, Fidelity or the qualified custodian of an outside third party manager.

Information about Crowell Weedon Advisor Accounts:

- ❖ **CW Portfolio Advisor and CW FundPort Advisor** - There are no ticket charges or over-limit trading charges for CW Portfolio Advisor, CW Fixed Income Advisor or CW FundPort Advisor. However, the CW Portfolio Advisor and CW FundPort Advisor have been designed for long-term investment accounts, not for active trading accounts. Overly active accounts may be converted to CW Portfolio AdvisorPlus at the sole discretion of CWCO. CWCO will provide 5 business days notice prior to converting accounts to CW Portfolio AdvisorPlus.
- ❖ **CW Portfolio AdvisorPlus** - The CW Portfolio AdvisorPlus has been designed for more actively traded accounts. In addition to the Management Fee, if CWCO-BD is either the Broker-Dealer or Custodian for your Account, you will also be assessed a \$15.00 per trade transaction fee (the "Transaction Fee") which is intended to offset the costs associated with completing the transaction. If you select another Broker-Dealer or Custodian, the transaction fees, if any, will be determined by the other Broker-Dealer and/or Custodian.
- ❖ **CW Asset Manager** - You may also be charged an additional 0.50% Management Fee for the Asset Manager's services. The Management Fee will be divided between the Investment Advisor Representative and the Asset Manager in accordance with the applicable fee and compensation schedules.

Information about Third party Platform Providers:

Outside third party platform providers, which may include separately managed assets and mutual fund fee-based programs. These programs are selected through a comprehensive due diligence process by consultants selected by the outside third party platform providers. Outside third party platform providers may select funds and programs using a screening process that looks at various investment criteria, including risk-adjusted performance, management continuity, portfolio composition, investment style, expense structure, turnover rate, asset growth rate, asset size, and various risk measurements. CWCO-IA currently uses Envestnet Direct SMA solution and Lockwood Advisors as Third Party Platform providers. CWCO also has relationships with Fidelity Investments and Schwab Institutional. Outside third party platform providers, managers and consultants are not affiliated with CWCO-IA.

Third Party Money Managers Crowell Weedon Direct:

Crowell, Weedon Direct allows investors to directly access independent investment managers on a dual contract service basis. This arrangement generally allows for lower pricing than when using outside platform providers directly. CWCO-BD provides trade execution and custody services. Managers currently in the program include:

- Affinity Investment Advisors, LLC (www.affinityinvestments.com)
- Capstone Asset Management (www.capstonefinancial.com)
- Davidson Investment Advisors (www.davidsoncompanies.com)
- Dorsey, Wright & Associates (www.dorseywright.com)
- Efficient Market Advisors (www.efficient-portfolios.com)
- First Republic Investment Management (www.firstrepublic.com)
- First Trust Advisors, L.P. (www.ftportfolios.com)
- Kelly Capital Management, LLC (www.kcm-invest.com)
- Lateef Investment Management (www.lateef.com)
- Liebau Asset Management Company, LLC (www.liebauasset.com)
- Miller, Tabak Asset Management (www.millertabakam.com)
- Ocean Park Asset Management (www.oceanparkam.com)
- Robert Bender & Associates (www.robertbender.com)
- SFE Investment Counsel (www.sfeic.com)

Third party Money managers are not affiliated with CWCO-IA. For additional information and a copy of the third party money manager's disclosure document, please contact the appropriate manager or your CWCO Financial Advisor.

Information about Crowell, Weedon Asset Management (CWAM) Programs:

CWAM consists of portfolio managers at CWCO who manage their clients' accounts as well as manage the portfolios of clients referred to them by other IARs. CWAM clients may be charged an additional 0.50% Management fee for the Asset Manager's services. Therefore, clients invested in CWAM programs may pay higher fees than clients whose accounts are not invested in a CWAM program. Clients are generally charged one management fee which is shared between the Asset Manager and referring IAR.

CWAM programs include Eagle Investment Portfolio, Foundations Portfolio, and Montecito Investment Portfolios. A brief description of each CWAM program is below:

Eagle Portfolio

Eagle Portfolio is a fee-only investment advisory program introduced through CWCO-IA. The Eagle Investment program employs a standardized portfolio approach, utilizing equity securities and a covered call writing strategy. The program focuses on "high quality stocks" that pay dividends and sell call options. The investor receives income in the form of dividends, and cash flow is increased through premiums received from selling "covered calls". Investors best suited for this program are neutral to moderately bullish on the stock market, willingly limit upside potential in exchange for increasing cash flow, and would like to be paid for assuming the obligation of selling a particular stock at a specified price in the future. Acceptable asset classes of investment vehicles include: common stock, convertible stock, preferred stock, American Depositary Receipts, covered-call options contracts, partnerships, municipal debt, treasury and government agency debt, investment-grade corporate debt, ETNs, ETFs, Mutual funds and money market funds.

Foundations Portfolio

Foundations is a fee-only investment advisory program introduced through CWCO-IA, and is designed to be the foundation of a long-term investor's core assets. It is appropriate for both private investors and fiduciaries, and can be tailored to meet the needs of either taxable or non-taxable accounts. Four alternative strategic asset allocation models are structured according to a client's primary goals: Capital Preservation, Income with Growth, Growth with Income, or Capital Appreciation. *Foundations* use an investment process that seeks to actively align the portfolio with long-term client goals while adjusting for risks and opportunities in the shorter-term. An appropriate investment posture is generally different in each of the four distinct phases of the economic cycle: Early Growth, Mature, Early Decline, and Recession. Portfolio Managers seek to navigate the economic cycle by tactically adjusting the asset allocation within permitted ranges and selecting securities based upon fundamentals, valuation and market conditions. A *Foundations* Portfolio invests in four distinct asset classes: stocks, debt securities, cash equivalents, and shares representing hard assets. Foundations portfolios may hold individual securities, exchange-traded funds, and/or mutual funds at net asset value.

Montecito Investment Portfolios

Montecito investment Portfolios is a fee-only investment advisory program introduced through CWCO-IA. The mission of Montecito Investment Portfolio is to provide diversified, disciplined, long-termed investment solutions, and service and guidance to help our clients. Assets are generally allocated amongst ownership of corporate stock, income securities, and income producing real estate and asset based securities. Using these asset classes and rebalancing to a client's allocation range generally creates a strategy for clients to endure change over economic cycles. Additionally, over the long term, rebalancing helps provide the discipline for assets to be purchased at lows vs. highs; and usually reduces the overall volatility of a portfolio. Eligible securities include individual debt and equity securities, mutual funds, index funds, exchange-traded funds, master limited partnerships, and other eligible securities the manager deems appropriate. Options and futures are prohibited.

Financial Planning Services

On more than an occasional basis, CWCO furnishes advice to clients on matters not involving securities, such as financial planning matters.

Financial planning services will typically involve the review of a client's overall financial situation, personal and financial goals, risk tolerance, investment objectives, and time horizon. Financial planning services may include, but are not limited to:

Portfolio Review and Evaluation
Cash Flow and Net Worth Analysis
Retirement Planning
Education Funding Planning
Assist in developing a Financial Plan

Retirement Account Analysis
Risk Management Analysis
Planning for Family Member Special Needs
Consulting with Qualified Plan Sponsors
Assist in the development of an Estate Plan

Tailored Relationships

CWCO offers a variety of financial services to both existing and prospective clients that are tailored to your stated objectives. Each client whose account is managed on a discretionary basis is required to execute an Investment Policy Statement (IPS) for that account. An IPS includes the client's investment objectives and risk tolerance as well as guidelines of how the portfolio is to be managed, and any restrictions on investing in

certain securities or types of securities in the portfolio. The IPS is generally executed by you, your financial advisor and supervisor of the financial advisor.

Agreements may not be assigned without client consent.

ERISA Statement

This section shall apply if the investment management account(s) is for (i) a pension or other qualified employee benefit plan (including a 401(k) plan) governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”); (ii) a tax-qualified retirement plan under section 401(a) of the Internal Revenue Code of 1986, as amended (the “Code”), and not covered by ERISA; or (iii) an individual retirement account (“IRA”) under Section 408 of the Code.

You represent that CWCO-IA, IAR, and Portfolio Manager(s), as applicable, have been furnished complete copies of all documents that establish and govern the plan and evidencing your authority to retain CWCO-IA, IAR, and Portfolio Manager(s). You shall promptly furnish any amendments to the plan, and you agree that, if any amendment affects the rights or obligations of CWCO-IA, IAR, and/or Portfolio Manager(s), such amendment shall be binding on CWCO-IA, IAR, or Portfolio Manager(s) only when agreed to in writing.

You agree to maintain appropriate ERISA bonding for the managed account(s) and to include within the coverage of the bond CWCO-IA, IAR, and Portfolio Manager(s), as applicable, and their personnel and representatives as may be required by law.

Firm acknowledgment:

If you are a pension or other qualified plan subject to ERISA, you appoint CWCO-IA, IAR or Portfolio Manager(s), and CWCO-IA, IAR or Portfolio Manager(s) accept the appointment only as “investment manager” for purposes of ERISA and the Code, and CWCO-IA, IAR and Portfolio Manager(s) acknowledge that they are a “fiduciary” within the meaning of Section 3(21) of ERISA and Section 4975(e)(3) of the Code (but only with respect to the provision of services normally associated with a Portfolio Manager(s)).

Assets under Management

As of April 29, 2011, CWCO-IA manages assets below:

| | Assets Under Management | Total# of Accounts |
|-------------------|--------------------------------|---------------------------|
| Discretionary | 325,841,796.00 | 858 |
| Non-Discretionary | 496,994,876.00 | 1657 |
| Total | 756,434,161.00 | 2515 |

Item 5 – Fees and Compensation

All fees are negotiable.

The fee charged to you will depend on the program selected and the assets under management in accordance with CWCO-IA fee schedule.

CWCO-IA's annual management fee schedule for accounts range from 0.50% to 3.00% of the account's value. Initial Investment amounts will vary depending upon the program you select. Account Fees are negotiable and subject to discounts on an Advisor-by-Advisor or account-by-account basis.

The annual management fee is assessed quarterly in advance, and is usually based on the closing value of the assets in your managed account at the end of the previous quarter. No portion of the Management Fee is based on a sharing of capital gains or capital appreciation of the Assets and no increase in the Quarterly Management Fee will be initiated without prior written notification to you.

CWCO-IA may charge you a fee based on (i) a percentage of the Account value, or (ii) on a commission basis. More actively traded accounts may incur a per transaction fee in addition to the Quarterly Account management fee. You will pay either a commission or a fee, but not both unless you are a party to the CW Advisor Plus program. Advisor Plus charges a \$15 transaction fee and a reduced asset fee. CWCO-IA will not charge both commissions and fees to an account under management. CWCO-IA may also allow its IARs, if agreed to by you, to offer investment management services based on an hourly rate. All fees are negotiable between you and the IAR within each percentage fee range designated on the Fee Schedule in the Investment Advisory Management Agreement outlined below:

CW Portfolio Advisor - Equity & Balanced Accounts

| Portfolio Value | | Annual Maximum Fee |
|-----------------|---------------|--------------------|
| First | - \$250,000 | 2.25% |
| Next | - \$250,000 | 2.00% |
| Next | - \$500,000 | 1.50% |
| Next | - \$1,000,000 | 1.25% |
| Next | - \$3,000,000 | 1.00% |
| Over | - \$5,000,000 | Negotiable |

CW Fixed Income Advisor – Fixed Income Accounts

| Portfolio Value | | Annual Maximum Fee |
|-----------------|---------------|--------------------|
| First | - \$500,000 | 1.00% |
| Next | - \$500,000 | 0.90% |
| Next | - \$1,000,000 | 0.85% |
| Next | - \$3,000,000 | 0.80% |
| Over | - \$5,000,000 | Negotiable |

CW Portfolio AdvisorPlus - Equity & Balanced Accounts

| Portfolio Value | | Annual Maximum Fee | Per/Trade |
|-----------------|---------------|--------------------|-----------|
| First | - \$250,000 | 2.25% | + \$15 |
| Next | - \$250,000 | 2.00% | + \$15 |
| Next | - \$500,000 | 1.50% | + \$15 |
| Next | - \$1,000,000 | 1.25% | + \$15 |
| Next | - \$3,000,000 | 1.00% | + \$15 |
| Over | - \$5,000,000 | Negotiable | + \$15 |

CW FundPort Advisor – Mutual Fund Accounts

| | Portfolio Value | Annual Maximum Fee |
|-------|-----------------|--------------------|
| First | - \$50,000 | 1.75% |
| Next | - \$50,000 | 1.50% |
| Next | - \$150,000 | 1.00% |
| Next | - \$250,000 | 0.85% |
| Next | - \$500,000 | Not Allowed |

CW Asset Manager Plus - Schedule #1

| | Portfolio Value | Annual Maximum Fee | Manager | Per/Trade |
|-------|-----------------|--------------------|---------|-----------|
| First | - \$250,000 | 2.25% | + 0.50% | + \$15 |
| Next | - \$250,000 | 2.00% | + 0.50% | + \$15 |
| Next | - \$500,000 | 1.50% | + 0.50% | + \$15 |
| Next | - \$1,000,000 | 1.25% | + 0.50% | + \$15 |
| Next | - \$3,000,000 | 1.00% | + 0.50% | + \$15 |
| Over | - \$5,000,000 | Negotiable | | + \$15 |

CW Asset Manager Plus - Schedule #2

| | Portfolio Value | Annual Maximum Fee | Manager |
|-------|-----------------|--------------------|---------|
| First | - \$250,000 | 2.25% | + 0.50% |
| Next | - \$250,000 | 2.00% | + 0.50% |
| Next | - \$500,000 | 1.50% | + 0.50% |
| Next | - \$1,000,000 | 1.25% | + 0.50% |
| Next | - \$3,000,000 | 1.00% | + 0.50% |
| Over | - \$5,000,000 | Negotiable | |

At the time of establishing a managed account, you will select the options for paying the management fee to CWCO-IA or to an approved outside third party manager. Under the options, clients will pay this fee as part of their total management fee, which is defined in the investment management agreement.

Generally, when you execute CWCO's Management Agreement, you are authorizing CWCO-IA to invoice the Custodian for the Management Fee and direct and authorize the Custodian to deduct the amount stated in the Management Agreement directly from your Account. You also direct and authorize CWCO-IA to instruct the Custodian to send you a statement, at least quarterly, indicating all activity in your Account including the Management Fee paid from the Account. It is your responsibility to verify the accuracy of the calculation of the Management Fee. Neither CWCO-IA nor the Custodian will determine whether the Management Fee is accurate or was properly calculated.

Unless you provide otherwise in your advisory agreement, all fees owed to CWCO-IA in connection with a managed account are automatically debited from your managed account or, at your direction, from another one of your accounts held by CWCO-IA. You may also authorize fee payment from your brokerage account to pay for financial planning services. If you participate in outside third party managed programs where CWCO-BD is not the custodian, you may be billed quarterly, in advance for management services. You should never make fee payments directly to your IAR. All checks are to be made payable to Crowell, Weedon & Co.

In addition to the Management Fee (and Transaction Fees for Portfolio AdvisorPlus Accounts) you may also incur certain charges imposed by unaffiliated third parties. Such charges include, but are not limited to, custodial fees, brokerage commissions, transaction fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which are disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), certain deferred sales charges, odd-lot differentials, transfer taxes, wire transfer fees and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Other fees that you may be charged, but are not limited to, may consist of custody and clearing Fees, reporting fees, outside money manager fees, IAR fee, on-going mutual fund fees and expenses imposed by the mutual fund company.

Generally, a 0.25% 12b-1 distribution/service fee is assessed by some mutual fund companies to shareholders and paid to CWCO-BD. This distribution/service fee is generally not paid to the IAR.

If you participate in an outside managed program, the annual management fee will usually not exceed 3.00%. CWCO-IA, IARs, and outside third party platform providers and managers, at their discretion, may provide discounts from the basic fee arrangement to you, employees, partners, directors, employee-related accounts, affiliates, and IARs.

You may make additions to and withdrawals from your CW Account at any time, providing sufficient funds are available and subject to CWCO's right to terminate the account if it falls below the minimum portfolio requirement of \$75,000.00 (or \$375,000.00 for Fixed Income and \$20,000.00 for FundPort Advisor). If Assets are deposited into the Account after the inception of the quarter that exceed \$40,000.00, (or \$200,000.00 for Fixed Income and \$10,000.00 for FundPort), the Management Fee payable on the additional Assets will also be prorated based on the number of days remaining in the quarter and deducted from the Account. You may withdraw Assets from your CW Account after providing CWCO with notice. All withdrawals are subject to customary securities settlement procedures. For partial withdrawals in excess of \$40,000.00, (or \$200,000.00 for Fixed Income and \$10,000.00 for FundPort), within a billing period, CWCO will credit any unearned Management Fee to the next quarter's Fee.

If a managed account is opened or closed during a month, prior to the end of the billing period, the management fee will be pro-rated based on the number of days remaining in the quarter and deducted from the Account, unless the executed management agreement specifies otherwise. These fees are automatically deducted from your managed account by CWCO-IA or the clearing party that provides custody and clearing services for the managed account. Where there is not enough cash or funds in a managed account to pay the management fee, the account will be rebalanced to generate a sufficient level of cash or funds to meet this expense, or in some cases, you may be billed directly for the management fee.

Managed accounts may be comprised of traditional open-end actively managed mutual funds that are either no-load or load-waived funds. Exchange Traded Funds ("ETFs") — managed accounts may be comprised of ETFs that are exchange traded index mutual funds. Other managed account types may implement active sector and tactical asset management techniques utilizing short selling, leveraging and rotation among asset classes or sectors, and derivative strategies. As previously mentioned CWCO-BD is a registered broker-dealer

and is a member of Financial Industry Regulatory Authority (“FINRA”), and the Securities Investor Protection Corporation (“SIPC”). Transactions are executed by CWCO-BD or the broker-dealer you selected by the qualified custodian, depending on where the assets is maintained. Clearing firm fees and execution charges vary among firms and you may pay higher or lower execution costs depending upon the fee schedule of each clearing entity or qualified custodian.

Fees for Financial Planning Services

Financial Planners may not conduct financial planning activities, for a fee, without first receiving approval from you and the Investment Policy Committee. Fees for financial planning services will vary depending on the scope of services provided, complexity of the financial plan, the types of issues addressed, and the frequency that services are rendered.

CWCO-IA requires completion of a Financial Planning Services Agreement (“Agreement”) executed by you and your IAR, and delivery of the CWCO Disclosure Brochure. Financial Planning Fees are negotiable between you and the IAR. You may be charged a separate fee for Financial Planning services, or such financial Planning services fees may be included in the normal and customary fees for Advisory services.

You will never make a financial planning services fee payable to your IAR. All financial planning services fees are to be made payable to Crowell, Weedon & Co.

The financial planning services fees described above are for services rendered by CWCO-IA and the IAR and do not include fees incurred by you with other professionals (i.e., personal attorney, independent investment advisor, consultants, or accountant) in connection with the financial planning process.

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

No portion of the Management Fee is based on a sharing of capital gains or capital appreciation of your assets.

CWCO does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the Financial Adviser to recommend investments that may carry a higher degree of risk to you.

Item 7 – Types of Clients

Clients include individuals, entities, pension and profit-sharing plans, self-directed IRA's, 401(k) plans and participants, 403(b)(7) plans and participants, trusts, charitable remainder trusts (CRTs), estates, and not-for-profit organizations..

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

Securities analysis may include charting, fundamental, technical, cyclical, and quantitative methodologies.

Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure.

Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

Cyclical analysis generally involves studying the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins, and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

Quantitative analysis generally seeks to understand behavior by using complex mathematical and statistical modeling, measurement and research. By assigning a numerical value to variables, quantitative analysts try to replicate reality mathematically.

We may also apply our proprietary research and analytics, portfolio diagnostics and risk management to the development of investment portfolios and solutions to achieve your objectives.

CWCO-IA does not represent, warrant or imply that the services or methods of analysis used by CWCO-IA can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections, crashes, or extraordinary events. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by CWCO-IA will provide a better return than other investment strategies. Investing in securities involves risk of loss that you should be prepared to bear. Past performances of any recommended managers or funds or securities, or the success of a manager is no guarantee of future success. There can be no assurance that you will not incur losses. The following risk factors are not intended to be a full or complete listing of all the risks involved in investing, and you should engage in your own evaluation of such risks.

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, the face value on existing bonds become less attractive, causing their market values to decline. Similarly, equities may also suffer from a rising interest rates. Therefore, in real terms, your portfolio may not keep up with the rate of inflation.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events that may cause prices to fall.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk. Investments made in foreign countries may depreciate if the corresponding value of the country's currency goes down.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of potential profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many individuals are interested in buying or selling a standard asset or product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9 – Disciplinary Information

In the past, we have entered into certain settlements with our regulators and other third parties and have been subject to adverse legal and disciplinary events. Below are summaries of certain events that may be material to your decision of whether to retain us for your investment advisory needs. Please note that the disclosures discuss disciplinary events associated with CWCO's broker dealer activities and not specifically relate to the firm's investment advisory business. In addition to the descriptions below, you can find additional information regarding these settlements in Part 1 of CWCO's Form ADV at www.adviserinfo.sec.gov.

On May 30, 2008, the Financial Industry Regulatory Authority (FINRA), censured and fined CWCO \$25,000 for violating the Securities Exchange Act and NASD rules. Between November 2004 and December 2005, CWCO was the subject of findings from four separate examinations conducted by the NYSE Division of Member Firm regulation. In the 2004 Sales Practice Unit ("SPRU") examination, the firm was found to have failed to have promptly filed a Form RE-3 with the NYSE on two separate occasions in connection with the misappropriation of funds by firm employees. In the 2004 and 2005 financial and operation examinations, the firm was found to have a business continuity plan that failed to meet the required elements. In the 2004 and 2005 SPRU examinations, the firm was found to have failed to properly complete its handwritten order tickets.

On May 21, 2007, the New York Stock Exchange (NYSE) issued an order censuring and fining CWCO \$225,000 for violating NYSE Rule 401(A) in that it did not at all times adhere to the principles of good business practice in the conduct of its business affairs, by:

- (a) Failing to timely deliver prospectuses in connection with certain sales of registered securities in violation of Section 5(B)(2) of the Securities of Act of 1933.
- (b) Failing to disclose to customers that its Registered Representatives were given opportunities to attend Sales Conferences at resort locations, and to receive increased commission compensation from the firm, with respect to customer transactions in certain investment products.
- (c) Violated NYSE Rule 100(B) in that it failed to deliver product descriptions in connection with the sales of certain Exchange Traded Funds.

Violated NYSE Rule 342 by failing to have policies and procedures in place reasonably designed to:

- (a) Cause prospectuses or product descriptions to be delivered to customers in connection with certain sales of registered securities, as required.
- (b) Cause disclosure to customers that its registered representatives were given opportunities to attend sales conferences at resort locations, and transactions in certain investment products.

On April 15, 2002, the New York Stock Exchange (NYSE) issued an order censuring and fining CWCO \$55,000 for:

- (a) Violating Rule 345(A) in that the firm permitted registered persons who had not complied with their continuing education requirement to perform their duties;
- (b) Violating Rule 401 in that the firm failed to adhere to the principles of good business practice by failing to conduct any formal analysis or review of data with respect to its obligation to provide best executions for its customers orders;
- (c) Violating Rule 346.16 in that the firm failed to implement reasonable supervisory procedures to review the outgoing correspondence of producing Branch Managers.
- (d) Violating Rule 342 in that the firm failed to provide reasonable supervision and a separate system of follow-up review to assure that continuing education and best execution requirements were complied with

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer:

Crowell, Weedon & Co. is dually registered as a broker-dealer and investment advisor. As such, most, if not all of the IARs are licensed to sell securities in their capacity as Registered Representatives or Registered Principals (“RR”) of CWCO-BD. As Registered Representatives, they may receive commission compensation for selling securities. This is a conflict of interest. They may also sell mutual funds and receive 12(b)-1 fees in addition to commissions. (12(b)-1 fees, named after a section of the *Investment Company Act of 1940*, are annual marketing or distribution fees and considered an operational or administrative expense). The fees are included as a part of the mutual fund’s total expense ratio and are paid from the mutual fund’s assets. Therefore, the fees come indirectly from your account assets at the mutual fund company. Every mutual fund prospectus includes a description of the fund’s fees and expenses.

To reduce this conflict of interest, the arrangement mentioned above is generally not applicable in investment management accounts. IARs are not paid 12b-1 fees on managed accounts. Further, IARs may either charge a quarterly management fee or commissions, but not both. Additionally, IARs are obligated to recommend mutual funds and other investments that are in your best interest and not based on compensation that they may receive from making the mutual fund or securities recommendation.

Also, If CWCO-BD executes the your securities transactions, or securities execution is through the broker-dealer who has custody of your managed account, CWCO-BD may benefit from this activity including, but not limited to, the offset of any fees or commissions earned against certain minimum annual financial requirements CWCO-BD has with these firms in the normal course of business.

In the interest of acting in the best interest of our clients, CWCO-BD will occasionally conduct principal trades in commission accounts. Principal transactions are generally defined as transactions where CWCO-BD, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to you. The conflict of interest with principal trading is that by buying securities from or selling securities to you to/from CWCO’s inventory account, your IAR may be tempted to make investment decisions for you that are based, not on what is in your best interest, but on the compensation to be received by him/her/CWCO. To lessen this conflict, CWCO will not conduct principal trading in your management (fee-based) accounts. However, during the normal securities clearing process, trading in advisory accounts will, occasionally, be held intra-day in internal inventory accounts to facilitate clearing. Should such transactions occur, they are purely incidental and not designed to benefit CWCO or its employees.

Additionally, CWCO will not conduct agency cross transactions in your advisory account. An agency cross transaction is defined as a transaction in which an IAR of CWCO acts as broker for both you, an advisory client, and for another person on the other side of the transaction. It is CWCO-IA's policy that the firm will not cross trades between your account and other clients' accounts.

Further, transactions in your investment management accounts may be executed through various broker-dealers. If you are a Financial Planning client, you may elect to implement recommended transactions through CWCO-BD or an alternate broker-dealer of your choice. CWCO-IA does not direct brokerage transactions for financial planning investment purchases, this authority remains with you.

Insurance Agency:

Some IARs may also be licensed life agents or are agents and/or brokers for various insurance companies. Crowell, Weedon & Co. is under common ownership with its insurance company and registered investment advisor. If you purchase insurance products (including variable and fixed annuities), your IAR, in the capacity as a life agent, will receive separate and customary commission compensation for insurance sales. This conflict may be reduced by not including the value of the insurance assets in the quarterly computation for managed fees.

Legal Document Specialist:

James Dougherty & Associates, LLC provides legal document assistance for individuals to help plan their estates. Clients of this service may also be clients of CWCO-IA. The potential conflict of interest is Mr. Dougherty may have an incentive to charge compensation for document services along with the compensation for investment advisory services. Mr. Dougherty's investment advisory clients may become a source for his document services. To alleviate this conflict Mr. Dougherty charges a flat rate fee for his document services and these fees are documented as separate and distinct from the fees charged for his investment advisory services. Mr. Dougherty does not provide legal advice.

Other Investment Adviser

Both Blake Todd and Jarrett Perez are dually employed with CWCO and Two Oaks Investment Management, LLC. Two Oaks is an investment advisor registered with the United States Securities and Exchange Commission ("SEC") and is a Limited Liability Company ("LLC") formed under the laws of the State of California. Two Oaks is an advisor to the Two Oaks Diversified Income Fund Class A and C. The funds are a part of the Northern Lights Fund Trust II, an open-end management investment company, which Two Oaks has an Investment Advisory Agreement with.

Mr. Todd and Mr. Perez are the Funds' portfolio managers and the Managing Members and owners of Two Oaks Investment Management, LLC. Blake Todd is a general Partner of Crowell Weedon & Co. Crowell Weedon does not maintain an ownership interest in Two Oaks. In their capacity as Financial Advisers to CWCO clients, Mr. Todd and Mr. Perez are presented with some conflicts of interest. Among those conflicts of interest are the following and how they are managed:

- As Registered Representatives of CWCO, Mr. Todd and Mr. Perez may direct trades for the fund through CWCO and CWCO may profit from that trading activity. To eliminate this conflict of interest, Two Oaks mutual funds trades are not directed through CWCO.
- Mr. Todd and Mr. Perez could place shares of the Mutual Fund, Two Oaks in discretionary accounts that they manage and get paid a management fee for such discretionary account management, and also receive a fund Advisory fee on the same moneys. To remove this conflict of interest for Mr. Todd's

and Mr. Perez's discretionary accounts at CWCO, these accounts are prohibited from owning any shares in the Two Oaks Mutual Fund.

- In their capacity of advising clients on the placement of their investments Mr. Todd and Mr. Perez are compensated as the broker of record and receive any sales commission for the placement of moneys into the Two Oaks Mutual Fund. As such, they may also receive any ongoing 12b1 servicing fees for those clients they are the broker of record for. To address this conflict of interest all clients are informed of the dual role Blake Todd and Jarrett Perez maintain and how they are compensated prior to their purchase of fund shares. Clients could also choose to invest in shares of the fund through another broker to remove this potential conflict of interest. For both Blake Todd and Jarrett Perez over 50% of their compensation comes from the commission and fees that their individual clients pay to them.

Other Industry Activities

CWCO-BD is a member of FINRA, as well as MSRB and SIPC. Additionally, Crowell, Weedon & Co. is registered with the California Department of Insurance as an insurance agency. Crowell, Weedon & Co. in these multiple capacities is actively engaged in selling securities, mutual funds, insurance products, investment advice, investment management services, exchange floor activities, exchange commission activities, broker or dealer making inter-dealer markets in corporate securities and Over-The-Counter ("OTC") securities, or other incidental activities. Crowell, Weedon & Co. may sell securities or insurance products to its investment management clients who elect to implement investment advice through CWCO-IA and IARs.

Certain employees are licensed with a commodity broker to facilitate commodity transactions for clients of CWCO-BD. Additionally, some employees of CWCO-BD may engage in CPA services. These activities may pose a conflict of interest to CWCO-IA clients. Dual compensation conflicts will be disclosed to such clients.

The principal Partners of CWCO-IA are responsible for managing its broker-dealer activities and may spend a majority of their time engaged in these other related business activities.

Item 11 – Code of Ethics

As a federally registered Investment Adviser regulated by the Investment Advisers Act of 1940, CWCO-IA has adopted a Code of Ethics for all access persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. CWCO-IA and its employees have a fiduciary responsibility to you whereby it must put your interests above its own. CWCO and its IAR's responsibilities to you are based on ethical principles of openness, integrity, honesty and trust. At all times, CWCO and its IARs must live up to the firm's motto: "Built on integrity. Grown on Trust". The Code of Ethics includes standards of conduct expected of CWCO's access persons and addresses conflicts that arise from personal securities trading by advisory personnel, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and restrictions on political contributions and outside business activities, among other things. All access persons at CWCO-IA must affirmatively acknowledge the terms of the Code of Ethics annually, or as amended.

CWCO-IA anticipates that, in appropriate circumstances, consistent with your investment objectives, it will cause accounts over which CWCO-IA has management authority to effect, and will recommend to investment

advisory clients or prospective clients, the purchase or sale of securities in which CWC0-IA, its affiliates and/or clients, directly or indirectly, have a position of interest. CWC0-IA's access persons are required to follow CWC0-IA's Code of Ethics. Subject to satisfying this policy and applicable laws, CWC0-IA's access persons may trade for their own accounts in securities which are recommended to and/or purchased for you.

CWC0-BD maintains inventory accounts in which the RRs buy and sell securities. At various times, these inventory accounts may be buying or selling securities that are also being recommended to you. This maintenance of inventory accounts is normal and customary and no disclosure is made regarding the account positions. To remove this conflict of interest, inventory accounts and the individuals responsible for the accounts are not allowed to access any information associated with recommendations being made to you. Any contemporaneous transactions are unintentional and not a result of a deliberate conflict of interest.

Periodically, CWC0-IA's access persons may invest in the same securities that they recommend to you. On such occasions, all access persons are required to follow CWC0-IA's Code of Ethics and policies and procedures on personal trading. Subject to satisfying these policies and applicable laws, access persons of CWC0-IA may trade for their own accounts in securities which are recommended to and/or purchased for you.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of CWC0-IA will not interfere with (i) making decisions in your best interest (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Certain diversified products such as mutual funds and ETFs have been designated as exempt transactions, based upon a determination that these would materially not interfere with your best interest. In addition, the Code restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as you do, there is a possibility that employees might benefit from your market activity in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between you and CWC0-IA.

Certain affiliated accounts may trade in the same securities with you on an aggregated basis when consistent with CWC0-IA's obligation of best execution. In such circumstances, the affiliated and your accounts will share commission costs equally and receive securities at a total average price. CWC0-IA will retain records of the trade order (specifying each participating account) and its allocation. Partial execution of block trades will be allocated proportionally among all clients and employees will not receive partial allocations until all clients' orders are filled. No client is systematically advantaged or disadvantaged by the bunched trading.

It is CWC0-IA's policy that the firm will not conduct principal or agency cross securities transactions in your accounts.

You may request a copy of the firm's Code of Ethics by contacting Audrey Maxwell at (213) 620-1850 or by e-mail request at amaxwell@crowellweedon.com.

Item 12 – Brokerage Practices

IARs are licensed to buy and sell securities as an RR through CWC0-BD. RR licensees are restricted in using any broker-dealer or custodian that is not approved by CWC0-BD due to certain regulatory rules and policies. CWC0-BD currently permits IARs to custody investment management accounts at CWC0-BD, Charles Schwab,

TD Ameritrade, Fidelity, and Pershing. CWCO-IA, from time-to-time may add or remove the availability of certain custody relationships without client notification. CWCO-BD permits the use of these other platforms because it has an agreement with them in exchange for services provided, which may include, not limited to, account custody, trade execution services, clearing services, access to information, and for a fee, electronic trade entry and account information look-up services for RRs and clients, recordkeeping services, exception reporting and access to various financial products.

CWCO's RRs that direct clients to other firms for custody and order execution for the investment management account may, but not always, receive benefits and support services for free or at reduced prices. Benefits and services may include such things as research, performance reporting, discounted quarterly advisory fee billing, account information, trade entry services, mutual funds that may be available to only institutional accounts or with substantial minimum investments, customized account statements, duplicate copies of client confirmations and statements, business-related products and services, seminars, conferences, and software. These are commonly referred to as soft dollar arrangements and are maintained in accordance with 28(e) of the act.

You should consider, in light of the limited trading platforms approved by CWCO-BD that only some of the approved trading platforms are limited in their ability to obtain the best execution price and lowest execution costs for each transaction or the product with the lowest internal expenses. Therefore, you may pay higher commissions or trade execution charges through the trading platforms approved by CWCO-BD than through broker-dealers that have not been approved for its investment management accounts. CWCO-IA periodically reviews and monitors its best execution obligations as required.

Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits and are not applicable to your investment management (fee-based) accounts.

Item 13 – Review of Accounts

Review of Accounts:

IARs periodically review your accounts. They will also regularly keep you informed as to the investment policy and strategy used to seek achievement of your investment objectives. IARs should review your current account strategy and status with you on no less than an annual basis.

Branch Managers, or their designees, will make reasonable efforts to thoroughly review your account activity to determine whether recommended securities are in your best interest. Additionally, at least annually, the Chief Compliance Officer, or his designee, will review a random sample of discretionary investment advisory accounts using your Investment Policy Statement (IPS) and/or account information, as a benchmark to assess appropriateness of the activity and positions. Through telephone calls and in-person meetings, your IAR will regularly keep you informed as to the investment policy and strategy being used to seek achievement of your investment objectives.

Triggering events such as your financial status, employment status, income change, or change in investment objective, time horizon or risk tolerance may warrant additional reviews of your account. The primary focus of this review is to monitor the account to ensure it is consistent with your investment objective, investment strategy, asset allocation, and proper fee deduction per the executed agreement. There is no specific review date. Both discretionary and non-discretionary managed accounts receive written confirmations of transactions and quarterly and/or monthly statements containing account information such as monthly activity, account value, transactions, and other relevant account information from the clearing firm, product sponsor, or account

custodian. You may contact your Financial Advisor or send an e-mail to info@crowellweedon.com to request secure electronic access to account statements and information.

CWCO-IA utilizes pricing information provided by independent resources in compiling and reporting managed account holdings information and valuations. There may be significant variance between the holdings and performance of the investment management accounts that are managed by CWCO-IA or other registered firms.

Although not every IAR or outside third party manager provides an annual review to every client, CWCO-IA encourages you to request such a review to discuss such account information such as account performance, changes in your investment objectives, goals, and financial situation, retirement planning, information gathering for client's tax advisor or estate planning advisor, and any other questions you may have concerning your managed account or financial plan.

Clients who receive only Financial Planning Services may be charged a separate fee for meetings with their IAR. Clients should read carefully the agreement to determine the amount of separate fees, if any.

CWCO-IA, through designated personnel, will perform periodic reviews of the outside third party platform providers and managers, including their performance to determine their continued participation in CWCO-IA's investment advisory programs. The criteria that may be used may include, but is not limited to, performance over time in comparison to established industry benchmarks, regulatory findings, news wire information, as well as financial stability, assets under management, and compliance with regulatory rules and regulations.

The accuracy of the information obtained from outside third party platform providers, and other resources, will be relied upon by CWCO-IA, but cannot be guaranteed by CWCO-IA.

Correction and Error policy

As in any business, operational mistakes will happen despite the good intentions of employees and the controls in place. CWCO-IA endeavors to correct these mistakes in a timely manner with no financial loss or harm to you. Errors and their corrections will be reviewed on a facts and circumstances basis.

Item 14 – Client Referrals and Other Compensation

CWCO-BD and IAR/RRs may receive from product sponsors marketing and sales training support, including reimbursement for expenses related to client seminars, advertising materials, and due diligence or educational seminars, including reimbursement for travel expenses, meals and lodging. This may be a conflict of interest but CWCO's IARs strive to uphold the firm's ethical principles of conduct.

CWCO-IA does not currently have any arrangements whereby we compensate any person, such as solicitors, other than its supervised persons, for client referrals. However, the firm has written policies and procedures in place should we decide to engage in this activity. We will make disclosure to you about this activity should we engage in it in the future.

Some IARs may belong to referral clubs that provide client leads for various professional services including financial planning and investment advice. Monthly dues are generally assessed but are not directly attributable to specific client referrals.

Item 15 – Custody

Custody, as it applies to advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control your funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

As a dually registered Investment Adviser and Broker Dealer, CWCO is a qualified custodian and has custody of your funds and securities. CWCO-BD sends written statements directly to you on at least a quarterly basis.

Your funds and securities may also be held at Charles Schwab, TD Ameritrade, Fidelity, and Pershing. You should receive at least quarterly statements from these other qualified custodian that hold and maintain your investment assets. Should you receive additional statements from CWCO regarding these accounts that are held at other custodians, we urge you to carefully review such statements and compare the official custodial records from the custodian to the account statements that we may provide to you. Our statements may vary from the official custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

CWCO also has a relationship with San Pasqual Trust Co. who acts as Trustee for clients' accounts. In this relationship, CWCO's IAR is the Financial Advisor and may manage the assets which are held at Marshall & Ilsley Bank.

Item 16 – Investment Discretion

CWCO-IA manages client assets on both a discretionary and non-discretionary basis. On discretionary accounts, clients have the ability to place reasonable restrictions on the types of investments that may be purchased. You may also place reasonable limitations on the discretionary power granted to CWCO-IA, outside third party manager, or the IAR, so long as the limitations are specifically set forth in your Investment Policy Statement (IPS).

CWCO-IA usually receives discretionary authority from you at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. You must provide such Investment guidelines and restrictions in writing to your IAR. As previously mentioned, generally, discretion is given at the outset of the relationship in the form of an Investment Policy Statement (IPS). Thereafter, discretion is exercised in a manner consistent with the stated investment objectives for your account when selecting securities and determining amounts.

Item 17 – Voting Client Securities

Unless we agree otherwise in writing, CWCO-IA is precluded from and you are responsible for directing the manner in which proxies solicited by issuers of securities you beneficially own are voted. You authorize and direct us to instruct the Custodian to forward to you copies of all proxies and shareholder communications relating to the Assets.

Therefore, CWCO-IA will not vote proxies or act on any other corporate actions requiring shareholder actions. You, including a “named fiduciary” under ERISA, specifically reserves the right to vote your own proxies or to take shareholder action with respect to other corporate actions requiring shareholder actions or designate a third party to vote on your behalf. You may also designate a third party to vote proxies on your behalf. The account Custodian will forward proxies and corporate actions to your address of record or to your designee.

Proxy voting policies and procedures are available upon written request to the address on Form ADV, Part 2, and Page 1.

Item 18 – Financial Information

This item is not applicable to this brochure. CWCO-IA is required in this Item to provide you with certain financial information or disclosures about the firm’s financial condition.

CWCO-IA does not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet of our most recent fiscal year. CWCO-IA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to you, and has not been the subject of a bankruptcy proceeding.

Privacy Policy

Protecting your privacy:

Crowell, Weedon & Co. is committed to protecting the personal and financial information you share with us. In accordance with current federal privacy regulations, we would like to share with you the policies we use to maintain the privacy of client information.

The information we collect:

Information about you, our client, is needed in order to provide you with the investment advice, products and services that best suit your needs. This information comes from the following sources:

- Information that you provide to us on your account application or other forms, including your name, address, social security number, date of birth, employer, assets, income, investment experience, risk tolerance, etc.
- Information about transactions in your account, such as your account balance, trading activity, and margin loan history.
- Information that may be obtained from others, such as credit reporting agencies.

Sharing information within Crowell, Weedon & Co.:

Unlike many other financial advisors or stockbrokers, Crowell, Weedon & Co. is an independent broker-dealer. We do not share your personal information internally with other divisions, subsidiaries or any affiliated companies for the purposes of marketing, nor do we use your personal information to market other products or services to you.

Sharing information with companies that help Crowell, Weedon & Co. provide services to you:

Crowell, Weedon & Co. may disclose personal information about you in order to provide you with the financial services that you have requested from us. For instance, your name, address and account activity are disclosed to the vendor who prepares and mails your monthly statements. And, if you order checks from us, we would also disclose your information to the vendor who prints those checks. However, such companies are required to protect your personal information just as carefully as we do.

We may also share your personal information when permitted, or when required to do so by law. For example, we may provide information to the Internal Revenue Service (IRS) under various tax reporting regulations. In addition, we may share your personal information with other parties under court order or if responding to a subpoena. We will also disclose your information when you direct us to do so and have given us your consent.

Crowell, Weedon & Co. does not sell your personal information to third-party marketers or to anyone else for any purpose.

Information disclosure & opt outs:

The federal law allows you to “opt out” of the sharing of your personal information with affiliated and non-affiliated companies in some circumstances. Since we do not currently share your information with any affiliates or any other party that would trigger the provision, you do not need to consider opting out. Should we ever be in a situation where disclosure of your personal information could trigger the opt out provision, you will be notified in advance and given an opportunity to opt out of such disclosure.

Protecting your personal information:

Our employees are educated to protect your personal information and respect its confidential nature. Access to customer information is restricted to only those employees who need to have it in order to provide the services you have requested. We conduct regular reviews of our business practices and procedures, including information gathering and confidentiality standards, to further ensure the protection of your personal information.

If you have internet access to your account through Crowell, Weedon's web site, we have protected your account information by putting it in a secure section, by using firewalls and other technology, and by requiring individual passwords to access account information. The padlock icon on your browser indicates that our servers are protected with Secure Sockets Layer (SSL) technology in order to prevent unauthorized viewing of personal information.

Updating your personal information:

You may update your personal, nonpublic information by either contacting your financial advisor or by calling us or by writing to us at our main office:

One Wilshire Building
624 South Grand Avenue, Suite 2510
Los Angeles, CA 90017
(213) 620-1850

Business Continuity Summary

Crowell, Weedon & Co. has established a Business Continuity Plan (BCP) to provide for critical business functions if it experiences any significant business disruptions, such as a power outage, natural disasters, or other significant events. Crowell, Weedon & Co. has back-up technology systems operating in different cities that are designed to take over critical operations should there be a disruption at our primary location. This will allow Crowell, Weedon & Co. to continue critical business operations within a few minutes of most disruptions. For the most severe events, Crowell, Weedon & Co.'s recovery plan is designed to have most business operations available within 24 to 48 hours. Crowell, Weedon & Co.'s recovery plan assumes that the government agencies and market systems are operating and that the Firm's back-up systems are available. No BCP can eliminate all risk resulting from a significant business disruption, but we review, update and test the BCP at least annually or as needed to protect our clients.

You may obtain a current summary of the BCP by visiting the web site, www.crowellweedon.com or by writing to Crowell, Weedon & Co., Attn: Business Continuity Plan, 624 S. Grand Avenue, Suite 2510, Los Angeles CA 90017.