

Triad Advisors, Inc.

Pinnacle Wrap Fee Program Brochure

SEC File No. 801- 55518

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<http://www.com>

March 31, 2014

This Wrap Fee brochure provides clients with information about the qualifications and business practices of Triad Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at www.com or 770-840-6042. 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.

Triad Advisors, Inc. is a dually registered investment adviser and broker-dealer. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Triad Advisors, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

On July 28, 2010, the United States Securities and Exchange Commission (“SEC”) published “Amendments to Form ADV” which amended the rules pertaining to the disclosure documents that advisers provide to clients as required by SEC Rules. This brochure is prepared according to the SEC’s amended rules. This section summarizes specific material changes that have been made to the brochure.

Pursuant to the amended SEC Rules, within 120 days of the close of our firm’s fiscal year (December 31st) we will deliver either:

1. a copy of the current (updated) Brochure that includes or is accompanied by the summary of material changes, or
2. a summary of material changes that includes an offer to provide a copy of the current (updated) Brochure.

We may further provide other ongoing disclosure information about material changes as necessary as well as provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting your Investment Advisor Representative or our Compliance Department at 770-840-6042 or compliance@triad-advisors.com.

Additional information about Triad is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Triad who are registered, or are required to be registered, as investment adviser representatives of Triad Advisors, Inc.

Material Changes Since the Last Update

This brochure by Triad Advisors, Inc. dated March 31st, 2014 serves as a replacement to the Form ADV Part 2A dated March 31st, 2013. Material changes to this brochure since the last updates are noted below:

1. Page 10, Additional Information: Disciplinary Information. Added disciplinary disclosures as required pertaining to a regulatory action against Triad by the Financial Industry Regulatory Agency (FINRA).
2. Page 14, Additional Information: Client Referrals and Other Compensation. Updated disclosures pertaining to economic benefits that we may receive from third parties in connection with advisory services to our clients.
3. Page 15, Privacy Policy. Included our most recent Privacy Policy.

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Services, Fees and Compensation

Client should read and consider the information contained in this brochure.

There is no assurance that the objectives of any client will be achieved.

Advisory Services

Triad Advisors, Inc. (“Triad”) is registered as both an investment adviser and a broker-dealer. Each client has an Investment Adviser Representative (“IAR”). IARs are generally broker-dealer representatives of Triad. In addition, the IAR is an advisory representative of Triad or is an advisory representative of an independently registered investment adviser.

If your IAR is a Triad IAR, Triad is providing advisory services to you in addition to brokerage and program services, as described in this brochure. If your IAR is acting as a representative of an independently registered investment adviser, that independently registered investment adviser is providing advisory services to you, and you will receive a disclosure brochure from that firm. For the purposes of this document, the term “Advisory Firm” refers to either Triad or the independently registered investment adviser whichever is providing advisory services to you.

Clients who wish to participate in the Pinnacle Program (“Pinnacle”) generally enter into a Pinnacle agreement. The Pinnacle agreement will set forth which Advisory Firm is providing consulting services to you.

Clients inform their Investment Adviser Representatives of the investment objectives, risk tolerance, and investment time horizon, and any investment policies, guidelines, or reasonable restrictions applicable to the assets they designate for investment through the Pinnacle Program. Based on this information, the IAR may provide advice and/or manage client accounts by purchasing and/or selling stocks, bonds, mutual funds, exchange-traded funds (ETFs), options, and Variable Annuity (VA) sub-accounts. IARs generally manage the accounts in Pinnacle on a non-discretionary basis. This means that they will purchase or sell securities for accounts only as authorized by the client. Under certain circumstances, a client may grant the IAR discretionary trading authority over an account. This means that the IAR will buy and sell securities without consulting the client in advance.

IAR may manage various model portfolios for each VA carrier product that are maintained outside of an account structure. Although the Variable Annuities and their respective sub-accounts may be represented on various reports or statements, the Variable Annuities are held directly at the VA sponsor. Sub-account asset allocations may be limited by the VA Carrier product fund options. Certain asset allocations may also be restricted by the VA carrier. IARs will not direct reallocations of the sub-accounts through these account structures. In such cases when a reallocation is required, the IAR will direct and execute such reallocation transactions directly through the VA sponsor. Clients must complete documentation necessary under the applicable variable annuity contract to grant the IAR access to information necessary to perform these services. Triad has approved various VA carrier products for this service and may restrict the inclusion of a VA to an account structure at our discretion.

Any restrictions on the management of an account imposed by a client may cause the IAR to deviate from the investment decisions or recommendations that the IAR would otherwise make with respect to the account.

Execution of Trades

Triad Advisors will generally also act as broker-dealer.

Custody

An unaffiliated entity acts as custodian for Pinnacle accounts. The custodian is named in the client's agreement with the Advisory Firm, as applicable. In most cases National Financial Services, LLC ("NFS") will act as custodian.

Fees and Compensation

The client pays a quarterly Wrap Fee which is calculated based on a percentage of the value of the client's account.

The maximum annual Wrap Fee rates are:

Portfolio Value		Annual Wrap Fee Rate
\$25,000	— \$250,000	2.75%
\$250,001	— \$750,000	2.25%
\$750,001	— \$2,000,000	1.75%
\$2,000,001 +		1.50%

The Wrap Fee rate may be either a flat annual fee rate (for example, a maximum rate of 1.50%) or will be a blended rate, using two or more of the rate tiers set forth above. A blended rate is calculated by charging a lower rate on the assets above the designated tiers. The rates are subject to negotiation between the IAR and each client. The Wrap Fee is negotiable based on a variety of factors, such as size and type of account, complexity, range of services utilized, etc.

Regardless of the actual quarterly Wrap Fee rate or the value of the assets in the accounts, the minimum fee charged to accounts in Pinnacle each quarter will generally be \$157. The imposition of the minimum fee may cause the effective Wrap Fee rate (expressed as a percentage) to be greater than the fee rates specified in the client's Pinnacle agreement.

Either party at any time, and upon written notice, may terminate the Pinnacle agreement and a pro rata portion of any Wrap Fee paid by the client in advance will be remitted to the client based on the number of days left in the quarter, following receipt of the notice of termination by Triad.

The Wrap Fee covers the advisory services provided by the Investment Adviser Representatives, execution of transactions through Triad, and custodial services provided by NFS (unless otherwise agreed between the custodian and the client).

The Wrap Fee does not cover:

Certain Performance Reporting Fees. The IAR may provide certain clients with quarterly performance reports and may charge a quarterly fee for these reports in addition to the Wrap Fee. The IAR will provide clients to be charged this fee with additional information about the fee, including the amount.

Other broker-dealer and custodian fees, costs and compensation. Other costs that may be assessed by broker-dealers or the custodian and that are not included in the Wrap Fee include: fees for transactions executed away from Triad, dealer mark-ups and spreads paid to market-makers. The Management Fee also does not cover debit balances or related margin interest, "mark-ups" and "mark-downs" or "dealer spreads" that broker-dealers (including broker dealer affiliates) may receive when acting as principal

in certain transactions, brokerage commission or other charges resulting from transactions not effected through Triad. The Management Fee also does not cover costs associated with exchanging foreign currencies, odd-lot differentials, IRA fees, transfer taxes, exchange fees, wire transfer fees, extensions, non-sufficient funds, mailgrams, legal transfers, bank wire charges, postage fees or SEC fees or other fees or taxes required by law.

Triad may recommend or select funds for inclusion for accounts that are in Triad's Premier Funds program which Triad maintains in its capacity as a broker-dealer. Under the Premier Funds program, in exchange for certain benefits, such as broader access by Triad's representatives, mutual fund and variable annuity sponsors in the program are required to pay for participation in the program by sharing with Triad a portion of the revenue generated from the sales of their products. Certain product sponsors also provide for the payment of a marketing allowance to Triad which may be based upon a percentage of the amount of the sponsor's product purchased by clients. Triad, at its sole discretion, may under certain circumstances share all or some of any marketing allowance payments with its registered representatives as part of compensating them for marketing and distribution expenditures incurred promoting the sponsor's products. Although Triad may receive this compensation in its capacity as broker-dealer, no portion of any compensation received under the Premier Funds program is passed through to your Investment Advisory Representative in connection with your advisory account. For the most current list of Premier fund families, please ask your Investment Advisory Representative or contact Triad directly at the number listed on the first page.

Variable annuity companies generally impose internal fees and expenses on client variable annuity expenses, including contingent deferred sales charges and early redemption fees. These fees are in addition to the advisory fees and expenses referenced above. Complete details of such internal expenses are specified and disclosed in each variable annuity company's prospectus. Please review the Variable Annuity prospectus for full details.

Certain securities, such as over-the-counter stocks and fixed income securities are traded primarily in "dealer" markets. In such markets, securities are directly purchased from, or sold to, a financial institution acting as a dealer, or "principal." Dealers executing principal trades typically include a "mark-up," "mark-down," and/or spread in the net price at which transactions are executed. When Ladenburg Thalmann & Co. Inc (LTCO), an affiliate of Triad, executes a transaction for a security traded in the dealer markets, LTCO either will execute the transaction as agent through a dealer unaffiliated with LTCO, or as principal in accordance with applicable law. Clients in the Program will not pay commissions or separate transaction charges to LTCO in connection with these transactions, however, the client will bear the cost (including any mark-up, mark-down, and/or spread) imposed by the dealer as part of the price of the security. Thus, the dealer will receive compensation in connection with most principal trades. Triad has a conflict of interest in using LTCO to execute principal transactions because LTCO will receive compensation in connection with the trade as dealer, which is in addition to the Program Fee. For more information about how this conflict of interest is addressed, see the "Other Financial Industry Activities and Affiliations" section below.

In addition, as broker-dealer, Triad may execute fixed income trades through Advisors Asset Management. Triad receives payments from Advisors Asset Management for having directed a volume of transactions to them for execution of orders for client accounts, which may include advisory accounts. This compensation does not affect the price that clients pay for securities or the transaction charges they pay. More information about these payments is available upon request.

Triad, as broker-dealer or custodian, may charge the client certain additional and/or minimum fees. In addition to the Program Fee, each mutual fund or ETF in which clients may invest also bears its own investment advisory fees and other expenses. The mutual funds available through Pinnacle may be available directly from the funds pursuant to the terms of their prospectuses and without paying the Wrap Fee or Manager fee.

Exchange-traded funds are also available outside of Pinnacle without paying the Wrap Fee or Manager fee, subject to applicable commissions and/or transaction charges. Further, to the extent that cash used for investment comes from redemptions of a client's mutual fund or other investments outside of the Program, there may be tax consequences or additional cost from sales charges previously paid and redemption fees incurred. Such redemption fees would be in addition to the Wrap Fee on those assets.

Additional expenses associated with the specific underlying investment funds such as, redemption fees may apply. Certain mutual funds used in the Program may charge a redemption fee if shares are redeemed within a specified period of time. Clients may incur redemption fees in the event that a sell is executed or model update is implemented. Redemption fees vary by fund and are described in each fund's prospectus.

Investment Adviser Representatives may also actively trade option contracts or on margin for client's accounts, which could result in a high portfolio turnover ratio. Additionally, the use of margin may also result in interest charges as well as all other fees and expenses associated with the security or account involved.

Triad may receive distribution or service ("trail") fees from the sale of certain mutual funds (including money market funds), pursuant to a 12(b)-1 distribution plan or other such plan as compensation for distribution or administrative services. Triad may also receive marketing reallowances and other revenue sharing payments from the sale of limited partnerships, real estate investment trusts (REITs), business development companies and other products on our platform as compensation for distribution or administrative services. These fees may be negotiated by Triad and are distributed from the fund's total assets or charged to the client as a portion of internal expenses by the product sponsor. These fee arrangements will be disclosed upon request of a client and are available in the applicable fund's prospectus or a product's offering documents. Triad may also participate in revenue sharing arrangements based on fees charged on certain mutual funds available on various custodial/recordkeeper platforms. These revenue sharing payments could potentially lead an Investment Adviser Representative to focus more on products offered by firms that make revenue sharing payments to Triad than those firms that do not make such payments when recommending services to their clients. In addition, Triad receives compensation in connection with cash held in the account. In addition to the advisory fee, Triad receives additional compensation from the custodian based on the value of credit balances in the accounts. If cash is swept into a money market fund, Triad receives compensation based on the value of assets in these funds as broker-dealer. Thus, Triad has an incentive to recommend that client select a money market fund as a sweep vehicle that pays more compensation to Triad than other funds. These payments are not retained where prohibited by law.

Clients may purchase securities through broker-dealers in initial public offerings, secondary offerings and special purpose acquisition company transactions. An affiliate of Triad may act as an underwriter or manager for such offerings, and as such, will receive compensation equal to either all or a portion of "gross spread" (the difference between the price the client pays for the security and the price at which it purchased the securities). Triad may also receive a portion of the gross spread as a member of the selling

syndicate. The advisory fee is not reduced to offset this compensation. The amount of the gross spread is described in the relevant prospectus, offering circular or official statement.

Most Triad Investment Adviser Representatives are also registered broker-dealer representatives of Triad. Triad may share a portion of payments received from a mutual fund or in connection with an initial public offering, a secondary offering, and/or a private placement with these representatives. Triad and its representatives may also receive compensation, such as 12(b)-1 or services fees, in connection with the sale of funds including the Triad Premier Funds program. Triad IARs may also receive a portion of the compensation that Triad receives as a member of a selling syndicate. Thus, Triad and its representatives have an incentive to recommend participating sponsors in the Triad Premier Funds program, certain mutual funds and to recommend purchases of sales in certain offerings because the Triad and its representatives will receive more compensation in connection with these securities than in connection with other types of securities.

Comparison Cost of Service

The Wrap Fee may cost clients more or less than purchasing services separately depending on the frequency of trading in the accounts, commissions charged at other broker-dealers for similar products, fees charged for like services by other broker-dealers and other factors. Among the factors impacting the relative cost of the program to a particular client include the size of the account, the type of account (i.e., equity or fixed income), and the size of the assets devoted to a particular strategy.

Investment Adviser Representatives receive a portion of the total Wrap Fee charged per the client's Pinnacle Agreement. This compensation may be more or less than what the IAR would receive if the client participated in other programs or paid separately for investment advice, brokerage and other services. The IARs may therefore have a financial incentive to recommend the Pinnacle Program over other programs or services.

Account Requirements and Types of Clients

Account Requirements

Triad does not impose an account minimum; however, accounts in the program generally have over \$150,000 in assets.

Types of Clients

Pinnacle is designed to assist clients, both individuals and institutions (such as pension and profit sharing plans, trusts, estates, charitable organizations, and corporations).

Portfolio Manager Selection and Evaluation

IARs are the only portfolio managers available through Pinnacle. Clients select the IARs.

Individual Needs of Clients and Restrictions

IARs tailor their advisory services to the individual needs of the client. Clients inform their IARs of their investment objectives, risk tolerance, and investment time horizon and give their IARs any applicable investment policies, guidelines, or reasonable restrictions. Clients may impose reasonable restrictions on the investments in their accounts, including designating particular securities or types of securities that should not be purchased for an account. Any restrictions imposed by a client may cause the IAR to make different recommendations than he or she would in the absence of such restrictions. Thus, the account may not perform as well.

Other Types of Accounts

IARs may provide advisory services under different account structures. Although the services provided are generally the same under each structure, the pricing of each one is structure differently. In addition to the Pinnacle Wrap Fee program described in this brochure, Triad also offers the Crown, Apex and Summit accounts. Under these account structures, clients pay an advisory fee to Triad plus additional charges in connection with each transaction. Triad IARs may utilize these account structures as described in Triad's firm brochure, which is available upon request. Other Advisory Firms may utilize these account structures as described in their firm brochures. IARs typically manage accounts in Pinnacle differently than the accounts that pay transaction fees because of the different nature of the services provided.

Several factors may influence the selection of the account structure including but not limited to:

- i. the client's preference for a "wrap" vs. transaction charges per trade on certain or all securities
- ii. account size
- iii. anticipated trading frequency
- iv. anticipated securities to be traded
- v. management style
- vi. long term investment goals

No Performance-based Fees

Neither Triad nor any IARs accept performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a client.

Methods of Analysis, Investment Strategies and Risk

IARs based recommendations that they make in Pinnacle using various types of investment strategies.

Each investment style, strategy, and investment entails varying degrees of risk. There can be no assurance that a particular investment or strategy will be successful or that clients will not suffer losses. Results generated by for each account will differ, and the investment advice provided to an individual will differ from client to client. Investment performance is not guaranteed, and the IAR's past performance with respect to a client's account or other accounts does not predict future performance.

The main sources of information IARs may use include financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filing with the SEC and company press releases. The investment strategies used to manage accounts may include long term purchases, short term purchases, selling securities within 30 days, short sales, margin transactions, and option writing.

Margin risk: Leverage increases a portfolio's risk as price swings are amplified in a margin account and clients can lose more funds than deposited if value of securities decline.

Options risks: An option holder runs the risk of losing the entire amount paid for the option in a relatively short period of time. This risk reflects the nature of an option as a wasting asset which becomes worthless when it expires. An option holder who neither sells their option in the secondary market nor exercises it prior to its expiration will necessarily lose their entire investment in the option. An option writer may be

assigned an exercise at any time during the period the option is exercisable. Starting with the day it is purchased, an American-style option is subject to being exercised by the option holder at any time until the option expires. This means that the option writer is subject to being assigned an exercise at any time after they have written the option, until the option expires or until they have closed out their option position in a closing transaction. For more information regarding the risks of options, please read the 'Characteristics and Risks of Standardized Options' brochure, which can be found at www.optionsclearing.com.

Voting Client Securities

Unless the IAR and the client otherwise agree in writing, IAR and the Advisory Firm are expressly precluded from taking any action or rendering any advice with respect to the voting of proxies solicited by, or with respect to, the issuers of any securities held in the account. The client expressly retains the authority and responsibility with respect to voting proxies for the account(s) or will delegate discretion with respect to voting such proxies to a third party. If the IAR receives any proxy materials that pertain to securities held in the account, the IAR will forward the materials to person designated by the client.

Client Information Provided to Portfolio Managers

As described in "Services, Fees and Compensation" above, clients inform their Investment Adviser Representatives of their investment objectives, risk tolerance, and investment time horizon and give their representative any applicable investment policies, guidelines, or reasonable restrictions. Based on this information, the Investment Adviser Representatives provide investment recommendations and/or manage client accounts.

Clients should promptly inform their Investment Adviser Representative of material changes in their financial circumstances or investment objectives. The IAR will periodically discuss, at least once a year, whether the management of the account continues to reflect the investment objectives and financial requirements of the client.

Client Contact with Portfolio Managers

Clients are free to contact IARs for questions or consultation in regards to their accounts. There are no restrictions placed on clients' ability to contact and consult with IARs.

Additional Information

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the adviser or the integrity of their management. The following information pertains to Triad. Other Advisory Firms will provide any relevant information about them in their separate disclosure documents.

- The State of Florida entered into a Cease and Desist Order with Triad (#3517-5-08/02) on 10/7/2002. Due to a clerical error, Triad failed to register its branches prior to conducting business with the State of Florida. Triad paid the fine of \$5,000.

- FINRA filed a complaint against Triad on 03/22/07 (Case #2006003971501). From 1/1/06 – 3/31/06, Triad failed to report 62 of 100 corporate bond trades within the time period prescribed by FINRA Rule 6230 and in violation of FINRA Rules 2110 and 3010. During the same period, Triad failed to establish and maintain a supervisory system, including written supervisory procedures, reasonably designed to achieve compliance with Rule 6230 and in violation of Rules 2110 and 3010. Triad paid the fine of \$10,000.
- FINRA filed a complaint against Triad on 03/12/2014 (Case #2011025792001). On March 12, 2014, Triad entered into an Acceptance Waiver and Consent with FINRA concerning consolidated reports, branch audits, supervision, net capital, and Regulation S-P. Triad consented to a censure, a \$650,000 fine, restitution to customers totaling \$375,000, and a review and revision to its consolidated report and branch audit processes.

Other Financial Industry Activities and Affiliations

Triad is a full service registered broker-dealer. In this capacity, Triad is involved in the purchase and sale of various types of securities, including, but not limited to, stocks, bonds, mutual funds and government securities. More information about Triad is set forth below. Information about other Advisory Firms is set forth in their separate disclosure documents.

In addition to being a registered investment adviser, Triad is a registered full service broker-dealer. Triad is a wholly owned subsidiary of Ladenburg Thalmann Financial Services Inc. (LTFS).

Other companies that are owned by LTFS and thus affiliated with Triad are:

Ladenburg Thalmann Fund Management, LLC (LTFM)	50% owned by LTAM
Ladenburg Thalmann & Co. Inc. (LTCO)	100% owned by LTFS
Ladenburg Thalmann Capital Agency Inc.	100% owned by LTFS
Ladenburg Thalmann Asset Mgmt. (LTAM)	100% owned by LTFS
Investacorp, Inc.	100% owned by LTFS
Investacorp Advisory Services	100% owned by LTFS
Premier Trust, Inc.	100% owned by LTFS
Securities America Financial Corporation (SAFC)	100% owned by LTFS
Securities America, Inc.	100% owned by SAFC
Securities America Advisors, Inc.	100% owned by SAFC
Arbor Point Advisors, LLC	80% owned by SAFC

LTAM owns 50% of Ladenburg Thalmann Fund Management, LLC, (LTFM), which is a registered investment adviser. LTFM is an adviser to an open-end registered investment company, the Boyar Value Fund, Inc. This fund is an open-end diversified management investment company. LTCO is the distributor of the fund. IARs may recommend that clients invest in the Boyar Value Fund or in the LTAM Alternative Strategies Fund, for which LTAM acts as investment adviser and LTCO acts as distributor. These recommendations create a conflict of interest because LTAM and LTCO generally receive more compensation in connection with the purchase of these funds than they do in connection with the purchase of other funds. In addition, these funds pay fees in connection with services or distribution, such as 12(b)-1 fees. These fees are paid to Triad as broker-dealer. IARs may receive part

of the compensation paid to Triad in the advisor representative's capacity as a broker-dealer registered representative of Triad, to the extent permitted by applicable law. Triad has policies and procedures to address such conflicts of interest.

Triad Investment Adviser Representatives may recommend Premier Trust to provide trust and administrative services. Premier Trust provides full disclosure with respect to its trust and administrative services and related costs.

LTCO acts as a dealer with respect to certain securities, and as such, may execute transactions for Triad clients as principal. As a dealer, LTCO may receive a "mark-up," "mark-down," and/or spread in the net price at which principal transactions are executed. This compensation is in addition to other compensation that client pays to Triad and its affiliates under the Program. Thus, Triad has a conflict of interest in deciding to execute trades through LTCO on a principal basis. Triad addresses this conflict of interest in the following ways. After receiving disclosures about a specific principal transaction with LTCO, clients have the opportunity to reject the transaction before it is completed, to the extent required by applicable law. In addition, Triad has policies and procedures in place to assure that clients receive best execution with respect to principal trades, regardless of whether the trade is executed by LTCO or an unaffiliated dealer.

Triad may also recommend that clients invest in securities issued in an initial public and secondary offering transactions for which LTCO acts as an underwriter and/or a member of the selling group or Triad acts as a member of the selling group. Triad has a conflict of interest in recommending these securities for several reasons. First, LTCO receives all or a portion of the gross spread – the difference between the price that the client pays for the security and the price that LTCO purchases the security for - in connection with such sales. This gross spread is generally 7%, but may be higher or lower in connection with certain offering. If Triad is a member of the selling group, it also receives a portion of the gross spread. Triad Investment Adviser Representatives generally receive a portion of this compensation as broker-dealer representatives of Triad. In addition, LTCO has a substantial interest—both financial and with respect to its reputation—in assuring that the offering is successful by having a large number of the securities purchased. Finally, in connection with certain offerings, LTCO has an obligation to purchase and resell a certain number of securities. Thus, because of its affiliation with LTCO, Triad has incentives to recommend these investments in these offerings for these reasons, rather than based on a client's needs. To address these conflicts, Triad has policies and procedures in place to make sure that securities in initial public offerings are recommended only to clients for whom they are suitable given the client's investment objectives and assets. In addition, clients are generally given transaction specific disclosure prior to the client's decision to invest in such securities.

Certain IARs are licensed to sell life and annuity insurance products through Triad Insurance, Inc. (a wholly owned subsidiary of Triad), and various other companies. Triad Insurance, Inc., as well as the appropriately licensed (IAR), will receive compensation for the sale of such products. Triad may recommend the purchase of insurance products in Pinnacle accounts. Clients are under no obligation to purchase insurance products through any particular insurance agency or representative.

Code of Ethics

Triad has adopted a Code of Ethics for all supervised persons of the firm describing our high standard of business conduct, and fiduciary duty to our clients. All supervised persons at Triad must acknowledge the terms of the Code of Ethics and personal securities transactions and holdings annually, or as amended.

The Code of Ethics is enforced through compliance monitoring activities and surveillance. In cases where the firm discovers that an employee has violated a firm policy and/or procedure, the firm's code of business conduct or code of ethics, a state or federal law, regulation of FINRA, the SEC, or other regulatory agency, the Compliance Department will take appropriate steps to investigate the circumstances and will take action commensurate with the manner of the violation. Such actions could take the form of a written warning to the employee in conjunction with the firm's Legal Department, or be as serious as disciplinary action up to and including termination. Any such investigations will be brought to the appropriate regulator's attention, if necessary, which may result in a disclosure of the violation on the employee's U-4 form, if required.

Triad Code of Ethics Rules are designed to ensure that our personnel: a) observe applicable legal (including compliance with applicable state and federal securities laws) and ethical standards in the performance of their duties; b) at all times place the interests of Triad clients first; c) disclose all actual or potential conflicts; d) adhere to the highest standards of loyalty, candor and care in all matters relating to Triad clients; e) conduct all personal trading consistent with the Rules and in such a manner as to avoid any actual or potential conflict of interest or any abuse of their position of trust and responsibility; and f) not use any material non-public information in securities trading. The Code of Ethics also establish policies regarding other matters such as outside employment, the giving or receiving of gifts, and safeguarding portfolio holdings information.

Under the general prohibitions of these rules, Triad personnel may not: 1) effect securities transactions while in the possession of material, non-public information; 2) disclose such information to others; 3) participate in fraudulent conduct involving securities held or to be acquired by any client; and 4) engage in frequent trading activities that create or may create a conflict of interest, limit their ability to perform their job duties, or violate any provision of these rules.

Triad personnel are required to conduct their personal investment activities in a manner that is not detrimental to Triad advisory clients. They are not permitted to transact in securities except under circumstances specified in the Code of Ethics. However, as described below, there may be circumstances where Triad Investment Advisor Representatives may buy and sell on behalf of its clients, securities of issuers or other investments in which they own securities or otherwise have an interest. The policy requires all Access Persons (defined as investment personnel, which includes portfolio managers, assistant portfolio managers, research analysts and trading room personnel, officers of Triad, and other designated persons) to report all personal transactions in securities not otherwise exempt under the policy. All reportable transactions are reviewed for compliance with the Code of Ethics. The Ethics Rules are available to clients and prospective clients from Triad upon request.

Interest in Client Transactions and Personal Trading

Investment Adviser Representatives may buy or sell for their own accounts, securities that are also held by their clients. Such transactions are permitted if in compliance with Triad policy on personal securities transactions. Reports of personal transactions in securities by Triad Investment Adviser Representatives are reviewed by Triad's Compliance department quarterly or more frequently if required.

Review of Accounts

Triad may conduct reviews on client's accounts. Accounts are primarily reviewed by the client's Investment Adviser Representative. In addition, Triad's compliance program includes the periodic review of a sample of customer accounts for consistency with a client's risk tolerance, investment time horizon,

performance objectives, and asset allocation instructions. Triad's compliance department consists of four employees who assist in these reviews. There is no minimum number of accounts assigned for the reviewer.

Clients are provided with monthly or quarterly account statements from the custodian, depending on the activity in the account. Reports include details of client holdings, asset allocation, and other transaction information.

Clients who also receive account reviews from Investment Adviser Representatives are strongly encouraged to compare them to the account statements they receive from the custodian. The account statements received from the qualified custodian are the official statement of the accounts. Any account information provided by IARs is for informational purposes only.

Triad or Investment Adviser Representative may provide clients with quarterly performance reviews of Pinnacle accounts, for which the client may be charged a fee in addition to the Wrap Fee, as set forth in "Fees and Compensation" above. Triad or Investment Adviser Representative do not provide tax advice, and nothing in the performance review should be construed as advice concerning any tax matter. Performance reviews are not a substitute for regular monthly account statements received from the custodian or Form 1099. Performance reviews should not be used to calculate fees or to complete income tax returns. Upon a client's specific request and subject to the relevant firm's policies and procedures and applicable law, the performance review may include information about assets outside the program. By including any such assets in the performance review, the firm is not undertaking to provide or responsible for providing any services with respect to those assets.

Client Referrals and Other Compensation

Triad may receive solicitors' (referral) fees based on a written agreement from unrelated investment adviser firms for referring clients for financial planning and/or investment advisory services. A disclosure letter will be provided to the client prior to or at the time of entering into any solicitation arrangement for financial planning and/or investment advisory services that identifies the solicitation fee. The solicitor's fee does not increase the fees paid by the client. In addition, fixed income transactions executed through some third-party managers are generally charged a mark-up or mark-down and a percentage of this charge is shared with our firm.

Triad may enter into agreements with third parties that will solicit clients for Triad and receive compensation for solicitation efforts. In such instances, the third party solicitor will receive either a percentage of, or a set fee from, the fee charged to the client. If a solicitor is used in connection with a client's account, the structure and arrangement of the solicitation agreement, as well as the compensation paid to the solicitor, will be fully disclosed to the client, which disclosure will be acknowledged in writing by the client when participating in a Triad program. The fee charged to a client is not affected by the use of a third-party solicitor in connection with client accounts, and a client will not be charged any additional fees for the use of such services.

As set forth in "Fees and Compensation" above, Triad and the IARs in their capacity as registered representatives of Triad, may receive compensation from third parties in connection with trades executed for or investments held in advisory accounts.

Certain mutual fund issuers and product sponsors may sponsor and pay for client luncheons, or other events, that Triad's IARs host. These arrangements may give rise to conflicts of interest, or perceived


conflicts of interest, with the firm's clients in connection with IAR recommendation of certain investment products. However, Triad's commitment to its clients and the policies and procedures it has adopted are designed to limit any interference with Triad's independent decision-making process when choosing the best investment for our clients.

Additionally, we receive additional compensation from Fidelity & National Financial Services ("NFS"), which serve as our Custodians for assets held in customer accounts. More specifically, Fidelity has agreed to pay us a fee when it acts as Custodian for certain assets, namely, certain non-Fidelity No Transaction Fee ("NTF") mutual funds. NTF mutual funds are mutual funds that are offered through advisors or brokers without any transaction charge. Triad receives additional compensation – from Fidelity, not from our clients – over and above the asset management fee we receive from our clients when such mutual funds are included in our portfolios, and such mutual funds are custodied at Fidelity. Notably, Fidelity mutual funds are excluded from this arrangement, meaning Triad does not receive this fee on any Fidelity mutual funds that are recommended or purchased for client accounts and custodied at Fidelity. Pursuant to Triad's agreement with Fidelity, Fidelity pays Triad from 2 to 12 basis points (or from \$.02 to \$.12 for every \$100 every year), depending on the amount of eligible client assets held at Fidelity on an ongoing basis. Similar to the luncheons and events described above, this arrangement may, in theory, give rise to conflicts of interest, or perceived conflicts of interest, as Triad would receive more compensation by recommending, or investing in, non-Fidelity NTF funds for clients that are custodied at Fidelity.. Clients should be aware, therefore, that Triad's receipt of additional compensation from Fidelity under this scenario creates a potential conflict of interest since this benefit could influence Triad's choice of (1) Fidelity over other custodians that do not furnish similar benefits and (2) non-Fidelity NTF mutual funds over other mutual funds not covered by this arrangement with Fidelity. However, Triad's commitment to its clients and the policies and procedures it has adopted are designed to limit any interference with Triad's independent decision-making process when choosing the most appropriate investments or custodian for our clients. In addition, as noted above, this additional compensation does not represent additional fees from your accounts to us; they are paid by Fidelity. Finally, we are committed to utilizing whatever fees we may receive under this arrangement to enhance our services to you.

Financial Information

Triad has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Privacy Policy

FACTS	WHAT DOES TRIAD ADVISORS DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing of your personal information. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully in order to better understand what we do.	

What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security Number, Date of Birth, Address, contact information and Income • Assets and Investment Experience • Account Transactions and Retirement Assets • Tax Reporting and Investment Performance Information <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
How?	<p>All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Triad Advisors chooses to share; and whether you can limit this sharing.</p>

Reasons we can share your personal information	Does Triad Advisors share?	Can you limit this sharing?
<p>For our everyday business purposes</p> <p>To administer, manage and service customer accounts, process transactions and provide related services for your accounts, it is necessary for us to provide access to personal information within the Triad Advisors, Inc companies and to certain nonaffiliated companies. We may share your personal information:</p> <ul style="list-style-type: none"> • To process your transactions, maintain your account(s), respond to court orders and legal investigations, report to credit bureaus, government entities and our outside auditors. • With third party administrators and vendors for the purposes of providing current and future information on your account (such as transaction history, tax information and performance reporting). • With affiliated and nonaffiliated entities that perform services for us or function on our behalf (such as check printing services, account aggregation providers, clearing broker-dealers, investment companies, and insurance companies) 	Yes	No
<p>For our marketing purposes</p> <p>To offer our products and services to you</p>	Yes	No
For our Affiliates to market to you	Yes	No
For nonaffiliates to market to you	No	We don't share

For joint marketing with other financial companies Federal and certain state laws give us the right to share your information with banks, credit unions, retirement plans and other financial companies with where a formal agreement exists between us and them to provide or market financial products or services to you. However, we will not share your information with these financial companies for marketing purposes if your financial advisor is not affiliated with them without your consent, but we may share information with these financial companies where necessary to service your accounts.		Yes	No
For clients of Independent registered representatives and investment advisors and Triad Advisors <ul style="list-style-type: none"> • If your financial advisor terminates his or her relationship with us and moves to a New Firm, we or your financial advisor may disclose your personal information to the New Firm, unless you instruct us not to. If you do not want us or your financial advisor to disclose your personal information to the New Firm when your financial advisor terminates his or her relationship with us, you may request that we and your financial advisor limit the information that is shared with the New Firm. • Your personal information may also be shared with certain entities that are owned, controlled by or affiliated with your financial advisor, such as an independent insurance agency, accounting firm or independent investment advisory firm. • In the event your financial advisor (or his/her estate) agrees with an unaffiliated financial advisor to sell all or some portion of his/her securities, advisory or insurance business your personal information may be shared with the acquiring financial advisor and his/her New Firm. <p>If your primary address is in a state that requires your affirmative consent to share your personal information with the New Firm (such as California, Massachusetts, Maine, New Mexico, North Dakota, or Vermont), then you must give your written consent before we will allow your financial advisor to take any of your personal information to that New Firm.</p>		Yes	Yes
Who we are			
Who is providing this notice?		Triad Advisors, Inc. a dually registered broker-dealer and registered investment adviser. Your financial advisor is a registered representative of Triad Advisors and we are required to provide this notice to inform you of how we collect, share and protect your personal information.	
What we do			
How does Triad Advisors protect my personal information?		To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include ongoing employee training, computer safeguards and secured files and buildings.	

How does Triad Advisors collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an investment account or deposit money • Seek advice about your investments • Give us your account information or provide employment information • Make a wire transfer <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • Our affiliates include companies engaged in the financial services industry with Triad Advisors; financial companies such as Ladenburg Thalmann & Co. Inc., Ladenburg Thalmann Alternative Asset Mgmt, Ladenburg Thalmann Fund Management LLC., Premier Trust, Inc., Securities America Inc., Securities America Advisors, Inc., Securities America Financial Corporation, Arbor Point Advisors, LLC, Investacorp Inc. and Investacorp Advisory Services Inc.
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies</p> <ul style="list-style-type: none"> • Triad Advisors does not share with nonaffiliates so they can market to you.
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • Triad does not engage in joint marketing.
To limit our sharing	<p>If you prefer that we not disclose your non-public personal information to persons or companies that are not Triad affiliates, you may opt out of those disclosures, except as to disclosures that are required or permitted by law. If you wish to opt out of any such disclosures of your non-public personal information, you may do so by completing the Non-public Personal Information Opt Out Form and returning it to us as instructed on the Form. Please contact us at the number below to receive a copy of our Opt Out Form.</p> <p>Please be aware, however, that we may not be able to service your needs as effectively if you opt out of information sharing. Depending on specific circumstances, we may need to close your account or cease performing certain services or cease effecting certain transactions for you if you do not allow us to share information with persons or companies whose assistance is critical. Your Triad Registered Representative or Investment Adviser Representative can discuss these matters with you as they relate to your specific circumstances.</p> <p>In addition Triad Advisors has signed the Protocol for Broker Recruiting ("Protocol") which allows the financial advisor servicing your account to take certain limited information in the event he/she leaves Triad Advisors and joins another firm which</p>

	has also signed the protocol. The information your financial advisor can take is limited to your name, your address, your phone number, your email address and the title of your account. If you choose to Opt-Out Triad Advisors will notify your financial advisor of your decision to keep the information confidential and not let it be taken by your financial advisor to his/her new firm.
Questions?	Triad Advisors, Inc., 5185 Peachtree Parkway, Ste 280, Norcross GA 30092. Call 770-840-6042 or go to www.com