

## **Form ADV Part 2A**

### **Firm Brochure**

Parker Investment Management, LLC

P.O. Box 1088  
Menlo Park, CA 94026

Phone: (650) 326-0387  
Email: [staff@parkerinvest.com](mailto:staff@parkerinvest.com)  
Website: [www.parkerinvest.com](http://www.parkerinvest.com)

This brochure provides information about the qualifications and business practices of Parker Investment Management, LLC ("Parker Investment"). If you have any questions about the contents of this brochure, please contact us by telephone at (650) 326-0387 and/or email at [staff@parkerinvest.com](mailto:staff@parkerinvest.com).

Parker Investment is an SEC registered investment adviser. Registration does not imply a certain level of skill or training. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Additional information about Parker Investment also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Date of the Brochure: March 30, 2020

**Item 2: Summary of Material Changes**

This section of the ADV Part 2A Brochure is meant to describe any material changes relating to Parker Investment that clients should be aware of since the last update of this brochure dated March 14, 2019. Parker Investment wants to make you aware of the following material changes:

- We updated our regulatory assets under management in Item 4 to reflect updated figures.
- We updated Item 8: Methods of Analysis, Investment Strategies and Risk of Loss section in connection with describing additional risks inherent in investing.

The date of our last Brochure was March 14, 2019. There were no material updates made at that time. No other material changes are made to this brochure. This Brochure dated March 16, 2020, is prepared according to the SEC's requirements and rules. Other amendments may have been made to this Brochure, which may not have been discussed in our summary, and consequently, we encourage you to read this brochure in its entirety. Currently, our Brochure may be requested by contacting Parker Investment at (650) 326-0387.

Clients and prospective clients are strongly encouraged to review this Brochure very carefully. Pursuant to SEC Rules, Parker Investment will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of our fiscal year, along with a copy of this Brochure or an offer to provide this Brochure. Additionally, as Parker experiences material changes in the future, we will send you a summary of our "Material Changes" under separate cover. For more information about the firm, please visit [www.parkerinvest.com](http://www.parkerinvest.com). Additional information about the firm and our investment adviser representatives is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 3: Table of Contents

<b>1</b>	<b>Cover Page .....</b>	<b>1</b>
<b>2</b>	<b>Summary of Material Changes.....</b>	<b>2</b>
<b>3</b>	<b>Table of Contents.....</b>	<b>3</b>
<b>4</b>	<b>Advisory Business.....</b>	<b>5</b>
4.A	Firm Description and Principal Owner .....	5
4.B	Types of Advisory Services .....	5
4.C	Tailored Services and Client Restrictions .....	5
4.D	Wrap Fee Programs.....	5
4.E	Client Asset Amounts .....	5
<b>5</b>	<b>Fees and Compensation .....</b>	<b>6</b>
5.A	Fee Schedule.....	6
5.B	Frequency of Billing and Payment Options.....	6
5.C	Other Fees.....	6
5.D	Fees Paid In Advance .....	7
5.E	Other Forms of Compensation .....	7
<b>6</b>	<b>Performance-Based Fees and Side-By-Side Management.....</b>	<b>7</b>
<b>7</b>	<b>Types of Clients .....</b>	<b>8</b>
<b>8</b>	<b>Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>8</b>
8.A	Investment Strategies .....	8
8.B	Investment Principles .....	8
8.C	Research and Analysis .....	9
8.D	Sources of Information .....	9
8.E	Risk of Loss .....	9
<b>9</b>	<b>Disciplinary Information.....</b>	<b>13</b>
<b>10</b>	<b>Other Financial Industry Activities and Affiliations .....</b>	<b>13</b>

10.A Broker-Dealer Affiliations.....	13
10.B Futures and Commodity Affiliations .....	13
10.C Related Person Affiliations .....	13
10.D Affiliations With Other Investment Advisers .....	13
<b>11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>14</b>
<b>12 Brokerage Practices .....</b>	<b>14</b>
12.A Factors Considered in Broker Selection .....	14
12. A.1 Research and Other Soft Dollar Benefits.....	16
12. A.2 Brokerage for Client Referrals .....	16
12. A.3 Directed Brokerage .....	16
12.B Aggregation of Securities Transactions in Client Accounts.....	16
<b>13 Review of Accounts.....</b>	<b>16</b>
13.A Periodic Account Reviews and Reviewers .....	16
13.B Other Account Review Triggers.....	16
13.C Content of Regular Reports.....	17
<b>14 Client Referrals and Other Compensation.....</b>	<b>17</b>
14.A Incoming Referrals .....	17
14.B Other Compensation .....	17
<b>15 Custody .....</b>	<b>17</b>
<b>16 Investment Discretion .....</b>	<b>17</b>
<b>17 Voting Client Securities.....</b>	<b>18</b>
<b>18 Financial Information .....</b>	<b>18</b>

## **Item 4: Advisory Business**

### **4.A Firm Description and Principal Owner**

Parker Investment Management, LLC (“Parker Investment” or the “Firm” or “We”) was formed on March 6, 2007 with the goal of providing asset management services to clients in a manner that delivers results accordant with the firm's founding principles.

The history of the firm dates back to 1987 when founder John W. Parker began providing investment services to clients on a part-time basis. In 1999 Mr. Parker's firm became a federally registered investment adviser, and in 2010 Mr. Parker changed his business structure from a sole proprietorship to a single-member LLC.

Mr. Parker is the sole owner.

### **4.B Types of Advisory Services**

We offer investment management services to individuals, retirement plans, charitable organizations, and corporations. We are required by law to act as fiduciaries, which means we must always put our clients' interest first. We take great pride in following this standard. We invest primarily in no-load mutual funds and exchange traded funds (“ETFs”). Clients can choose one of three customizable strategies: Growth, Growth & Income, or Income. In addition, we may purchase in client accounts individual stocks. We may further customize our investment strategies to the unique circumstances of clients.

### **4.C Tailored Services and Client Restrictions**

We generally have full discretion to trade our clients' accounts, which means we decide what to buy and sell and when to do so without first consulting with our clients before making a trade. We tailor our advisory services to the individual needs of our clients based upon different factors including, but not limited to, clients investment objectives, risk tolerance, tax concerns, minimum holding periods required by securities in which clients assets are invested, effect of possible transaction fees on the portfolio, institutional rules limiting the number or size of transactions, and other factors. As a consequence, transactions, holdings and results will likely vary from client to client and from account to account.

### **4.D Wrap Fee Programs**

We do not participate in any wrap fee programs.

### **4.E Client Asset Amounts**

As of December 31, 2019, we managed approximately \$429,100,000 of client assets on a discretionary basis and \$0 of client assets on a non-discretionary basis.

## **Item 5: Fees and Compensation**

### **5.A Fee Schedule**

We offer two methods for calculating our fee for our standard service ("Management Fee") – an Assets Based Method and a Gains Based/Minimum Fee Method. Our fees for our standard service are not negotiable.

#### **Assets Based Method of Compensation**

Our Assets Based Fee Rate is 0.25% of the account value per calendar quarter (which is roughly equivalent to an annual fee of 1.0%). The Assets Based Fee Rate is applied to the account value on the last day of the quarter to calculate the Assets Based Management Fee. If there are any deposits or withdrawals during a quarter, the fee is adjusted so the client is only billed for the time that we managed actual client assets.

#### **Gains Based/Minimum Fee Method of Compensation**

The basic idea of the Gains Based/Minimum Fee Method is to charge a fee equal to 10% of the investment gain due to the investments in the account during the period since the last billed gains fee, subject to a minimum fee of 0.125% of the account value per calendar quarter in quarters when the amount of the gains fee would be less than the amount of the minimum fee. If there are any deposits or withdrawals during a quarter, the fee is adjusted so the client is only billed for the time that we managed actual client assets. In addition, any Minimum Fees charged would be included as credits in calculating any future gains fees.

### **5.B Frequency of Billing and Payment Options**

We send the client a bill for the management fee after each calendar quarter. We may choose to not send a bill if the management fee is less than a threshold amount of our choosing, and may instead defer billing until a future quarter. The client will have the option to pay the management fee either: (a) by direct payment to us; or (b) by authorizing us to deduct the management fee from its corresponding account(s); or (c) by instructing us to deduct the management fee for one or more of the client's retirement accounts from the Client's non-retirement account(s) under our management. The client can indicate whether the instructions are for that calendar quarter only or whether they are also "Standing Instructions" to do the same in all future quarters. The client has the opportunity to update its instructions any time in the future, and we send the client a form to update management fee deduction instructions each time we send a bill even if the client has "Standing Instructions."

If we have not received the client's direct payment within thirty (30) days after we mail the client's bill for the management fee, then we may deduct the management fee from the client's corresponding account(s) without separate authorization from the client. Any management fees that are deducted from the client's account are treated as a client withdrawal when calculating future management fees.

### **5.C Other Fees**

Parker Investment's fees are exclusive of any, to the extent relevant, fees paid to

independent third parties for services including, but not limited to custodial fees, brokerage commissions, transaction fees, bank service fees, wire transfer and electronic fund transfer fees, short-term redemption fees, margin borrowing, and other fees and taxes on brokerage accounts and securities transactions. Clients may invest in mutual funds as part of Parker Investment's investment strategy. Investments in mutual funds and ETFs, however, generally include an embedded investment management fee paid to the investment adviser of the mutual fund. As such, client portfolios with investments in those types of securities will be subject to more than one layer of management fees.

Also, we sometimes choose to buy a different class of a mutual fund which currently has a \$30 buy and a \$30 sell fee charged by the broker-dealer if: (a) that class of the mutual fund has a lower internal fund expense ratio than the class which has no buy or sell fees; and (b) the anticipated savings, based on our expectation of how long we will hold that fund, from the lower internal fund expense ratio will be greater than the combined buy and sell fee.

#### **5.D Fees Paid In Advance**

There are no fees paid in advance.

#### **5.E Other Forms of Compensation**

We do not receive any form of compensation from the buying or selling of securities nor commissions.

### **Item 6: Performance-Based Fees and Side-By-Side Management**

Some of our clients pay a management fee based on performance while others pay a management fee based on assets under management.

We avoid possible conflicts of interest and the possibility of favoring different accounts, such as accounts of different sizes (e.g., large vs. small) and different billing methods (e.g., the Gains Based/Minimum Fee Method vs. the Assets Based Method), in the following ways:

- We typically invest client accounts in liquid, public securities, mostly mutual funds and ETFs. We have not run into issues where limitations on the quantity of securities available to buy or sell pressure us to make subjective judgment calls regarding trade allocations.
- In making or allocating trades, we do not take into consideration which billing method an account uses.
- In deciding to trade a position, we consider many different criteria to determine what is in the best interest of each account. For example, our criteria might include: (a) how the trade would affect the allocation of the account between different asset classes (b) what percentage of the account that position represents; (c) transaction fees as a percentage of the dollar value of the transaction in the account; and (d) possible tax consequences in taxable accounts. In taxable accounts, we strive to maximize tax efficiency. The ability, in taxable accounts, to accumulate long-term capital gains over long periods of time while deferring taxes is one of the keys to

success in long-term investing.

## **Item 7: Types of Clients**

We provide investment advisory services to individuals, high net worth individuals, pension and profit share plans, trusts, estates, charitable organizations, corporations, and other business entities. There is no minimum account size required to open or maintain an account.

## **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

### **8.A Investment Strategies**

Our core investment strategy has two key elements. First, we determine the relative weightings within the client's parameters to give to different asset classes based on our evaluation of which will outperform market averages for our investment time horizon. Then we implement the allocations to those asset classes by identifying what we believe will be the best performing no-load mutual funds and/or ETFs within those asset classes. Occasionally, we may purchase in client accounts individual stocks which we think have a very attractive long-term outlook that also meet our other criteria for security selection within the portfolio. We may also offer a customized option strategy using covered call options. Implementing an option strategy requires a client to complete the custodian's application and receive approval from the custodian.

Rather than maintaining a fixed allocation to the major asset classes, we vary the weighting of different asset classes during different time periods depending on market conditions, our expectations of their future performance, as well as other factors. As a result, our portfolios may be concentrated in certain asset classes rather than broadly diversified. We pay particular attention to the relative performance of the following major asset classes:

- Fixed income versus equity
- US equities versus foreign equities
- Developed markets versus emerging markets
- Large-cap stocks versus mid-cap stocks versus small-cap stocks
- Growth stocks versus value stocks

### **8.B Investment Principles**

Minimizing the costs of investing is vital for long-term investment success. Costs matter because investment returns are reduced dollar-for-dollar by the fees, commissions, and transaction expenses incurred. We take pride in keeping the cost of managing our client accounts low by implementing our investment strategy as described above.

Account holdings and performance can vary from account to account, depending on such factors as when money was deposited or withdrawn and tax considerations for taxable accounts. When money is deposited or withdrawn, we consider tax consequences, transaction fees as a percentage of the transaction amount, and market conditions in deciding what to buy or sell, so the relative weighting of the holdings in the account may change.



## **8.C Research and Analysis**

In formulating and undertaking our investment strategy, we analyze a variety of factors.

We identify price trends by looking at charts comparing relative strength of different asset categories using a proprietary system which we developed. We also identify trends by paying attention to data relating to money flows, such as mutual fund flow data. We obtain information about institutional fund flows by listening to institutional asset managers, reading their commentaries and reports sent to financial professionals. We pay close attention to studies of investor sentiment and how investors are investing their money. Interpreting this information is an art. When everyone likes an asset class, it is probably near a top, but smart institutional investors often give the first indication of a trend change when they begin to show interest in an out-of-favor asset class.

We also pay close attention to volatility, which often gives us information about whether a trend is in an early or a late stage. Volatility tends to increase as valuations become extended in the late stages of a trend, which is a signal for us to begin to readjust our holdings.

## **8.D Sources of Information**

The main sources of information that we draw from include real-time and historical market data, live market news provided online and on television networks, proprietary research purchased by subscriptions, research materials prepared by financial institutions for financial professionals, product-specific research analyses conducted by the investment staff during due diligence processes, phone calls and interviews with institutional management teams, financial newspapers and magazines, newsletters, and other electronic financial publications.

## **8.E Risk of Loss**

All investing and trading activities risk the loss of capital. There is no assurance can be given that the investment activities of an account we advise will achieve the investment objectives of such account or avoid losses. Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance. It is important that you understand the risks associated with investing.

Except as may otherwise be provided by law, we are not liable to clients for:

- Any loss arising from our adherence to your instructions or the disregard of our recommendations made to you; or
- Any act or failure to act by a custodian or other third party to your account.

The information included in this brochure does not include every potential risk associated

with an investment strategy, technique or type of security applicable to a particular client account. You are encouraged to ask questions regarding risks applicable to a particular strategy or investment product and read all product-specific risk disclosures. It is your responsibility to give us complete information and to notify us of any changes in financial circumstances or goals.

There are certain additional risks associated when investing in securities; including, but not limited to:

- Market Risk: Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- General Economic Conditions: Changes in general economic conditions may affect a client's activities. Interest rates, general levels of economic activity, the price of securities and participation by other investors in the financial markets may affect the value and number of investments made by a client or considered for prospective investment. Material changes and fluctuations in the economic environment, may affect a client's ability to make investments and the value of investments held by the client or the client's ability to dispose of investments. A client's portfolio investments can be expected to be sensitive to the performance of the overall economy. No assurance can be given as to the effect of these events on a client's investments or investment objectives.
- Legal and Regulatory Risks: The regulation of the U.S. and non-U.S. securities markets investment funds has undergone substantial change in recent years and such change may continue. The effect of such regulatory change on the accounts and/or the underlying investment funds could be difficult to predict.
- Inflation Risk: The Firm's portfolios face inflation risk, which results from the variation in the value of cash flows from a financial instrument due to inflation, as measured in terms of purchasing power.
- Market or Interest Rate Risk: The price of most fixed income securities move in the opposite direction of the change in interest rates. For example, as interest rates rise, the prices of fixed income securities fall. If the Firm holds a fixed income security to maturity, the change in its price before maturity may have little impact on the Firm portfolios' performance. However, if the Firm determines to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss.
- Market Volatility: The profitability of the portfolios substantially depends upon the Firm correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. The Firm cannot guarantee that it will be successful in accurately predicting price and interest rate movements.

- Trading Limitations: For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the account to loss. Also, such a suspension could render it impossible for the Firm to liquidate positions and thereby expose the client account to potential losses.
- Recommendation of Particular Types of Securities: In some cases, the Firm recommends mutual funds. There are several risks involved with these funds. These funds have portfolio managers that trade the fund's investments in agreement with the fund's objective and in-line with the fund prospectus. While these investments generally provide diversification there are some risks involved especially if the fund is concentrated in a particular sector of the market, uses leverage, or concentrates in a certain type of security (i.e., foreign equities). The returns on mutual funds can be reduced by the costs to manage the funds. Open end funds may have a diluted effect on other investors' interest due to the structure of the fund while closed end funds have limited shares which rise and fall in value according to supply and demand in the market. As a result, closed end funds typically price differently than the net asset value ("NAV").
- Firm's Investment Activities: The Firm's investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of nor predictable by the Firm. Such factors include a wide range of economic, political, competitive and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The markets may be volatile, which may adversely affect the ability of the Firm to realize profits on behalf of its clients. As a result of the nature of the Firm's investing activities, it is possible that the Firm's results may fluctuate substantially from period to period.
- Equity (Stock) Market Risk: Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk: When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

- Risks Associated with Fixed Income: When investing in fixed income instruments such as bonds or notes, the issuer may default on the bond and be unable to make payments. Further, interest rates may increase and the principal value of your investment may decrease. Individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power.
- ETF and Mutual Fund Risk: The pricing of ETFs and mutual funds have an expense ratio reflecting the funds' management fees, operating expenses, and marketing expenses if applicable. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.
- Options Risk: Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- Liquidity Risk: Liquidity risk can also result in unfavorable pricing when exiting (i.e., not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.
- Strategy Risk: Your investments will vary with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If you implement our financial planning recommendations and our investment strategies do not produce the expected results, you may not achieve your objectives.
- Call Risk: Bonds that are callable carry an additional risk because they may be called prior to maturity depending on current interest rates thereby increasing the likelihood that reinvestment risk may be realized.
- Credit Risk: The price of a bond depends on the issuer's credit rating, or perceived ability to pay its debt obligations. Consequently, increases in an issuer's credit risk, may negatively impact the value of a bond investment.
- Speculation Risk: The financial markets are populated by certain traders whose primary interest is in making short-term profits by speculating whether the price of a security will go up or go down. The speculative actions of these traders may increase market volatility that could drive down the prices of securities.
- Geopolitical Risk: The risk an investment's returns could suffer as a result of political changes or instability in a country. Instability affecting investment returns could stem from a change in government, legislative bodies, other

foreign policy makers or military control.

- 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.
- Privacy/ Cybersecurity Risk: The risk of actual and attempted cyber-attacks, including denial-of-service attacks, and harm to technology infrastructure and data from misappropriation or corruption, and reputation harm. Due to Parker Investment's interconnectivity with third-party vendors, exchanges, clearing houses and other financial institutions, Parker Investment, and thus indirectly our clients, could be adversely impacted if any of them is subject to a successful cyber-attack or other information security event. Although Parker Investment takes protective measures and endeavors to modify them as circumstances warrant, its computer systems, software and networks may be vulnerable to unauthorized access, misuse, computer viruses or other malicious code and other events that could have a security impact or render Parker Investment unable to transact business on behalf of clients.
- Foreign Market Risk: The securities markets of many foreign countries, including emerging countries, have substantially less trading volume than the securities markets of the United States, and securities of some foreign companies are less liquid and more volatile than securities of comparable United States companies. As a result, foreign securities markets may be subject to greater influence by adverse events generally affecting the market, by large investors' trading significant blocks of securities, or by large dispositions of securities, than as it is in the United States. The limited liquidity of some foreign markets may affect our ability to acquire or dispose of securities at a price and time it believes is advisable. Further, many foreign governments are less stable than that of the United States. There can be no assurance that any significant, sustained instability would not increase the risks of investing in the securities markets of certain countries.

## **Item 9: Disciplinary Information**

Registered investment advisors are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of the investment advisor and each investment advisor representative providing investment advice to you.

There are no reportable material, legal, or disciplinary events related to Parker Investment and any of its employees.

In the ordinary course of its business, Parker Investment and its management persons have in the past been, and may in the future be, subject to periodic audits and examinations by the appropriate regulatory authorities like the SEC. Parker Investment may also be subject to claims, litigation, formal and informal regulatory inquiries, subpoenas, employment-related

matters, disputes, investigations, and legal or regulatory proceedings, involving the SEC, other regulatory authorities, or private parties.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **10.A Broker-Dealer Affiliations**

Neither our company nor any of our personnel is registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

### **10.B Futures and Commodity Affiliations**

Neither our company nor any of our personnel is registered or has an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading adviser, or an associated person of the foregoing entities.

### **10.C Related Person Affiliations**

We do not believe that Parker Investment has a relationship or arrangement with any related person or company that would create a material conflict of interest with our advisory business or clients.

### **10.D Affiliations With Other Investment Advisers**

We do not recommend or select other investment advisers for Clients and do not receive compensation directly or indirectly from any other investment advisers.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **Summary Description of Our Code of Ethics**

An investment adviser is considered a fiduciary and our firm has a fiduciary duty to all clients. As a fiduciary, we have a responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is considered the core underlying principle for our Code of Ethics and the Standards of Professional Conduct ("Code") which also includes Insider Trading and Personal Securities Transactions Policies and Procedures.

In order to address conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our employees. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting process for all of our employees. Our access persons are required to sign an acknowledgement that they have read, understand, and agree to comply with our Code.

We invest in certain securities that we also invest in for clients. We believe our trading does not create a material difference in the price of securities that we buy and sell in our accounts

compared to the prices that we buy and sell these for in our clients' accounts. In order to minimize conflicts of interest, our employees will place client interests ahead of their own interests, adhere to the Firm's Code, and not trade in a way that takes advantage of price movements caused by Client transactions.

We may restrict trading for a particular security for our accounts or those of our supervised persons if there is a pending trade in that security in a client account.

All persons associated with Parker Investment are required to report all personal securities transactions to the firm quarterly.

A copy of the Code will be furnished to clients or prospective clients upon written request.

## **Item 12: Brokerage Practices**

### **12.A Factors Considered in Broker Selection**

We seek to recommend broker-dealers who will hold your assets and execute transactions on terms that are advantageous when compared to other available providers and their services. We may consider a wide range of factors, including, among others:

- Commissions
- Timeliness of execution
- Research services provided
- Custody services provided
- Financial condition
- Business reputation
- Quality of services

We currently have an arrangement with a custodian through which it provides services that include, among others, brokerage, custody, account administration and other related services. The custodian platform services that assist us in managing and administering clients' accounts include a dedicated client service team for advisers, and software and other technology that (a) provide access to client account data; (b) facilitate trade execution, trade aggregated, and trade allocation for multiple client accounts; (c) provide pricing and other market data; (d) facilitate payment of fees from its clients' accounts; and (e) assist with back-office functions, record keeping, and client reporting.

The custodian does not charge the Firm separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through the custodian or settle into custodian accounts. We recommend this custodian and its trading platform for client accounts for the following reasons: (a) no fees for opening or maintaining accounts; (b) no

fees for buying or selling no-load mutual funds as part of our core strategy provided that these funds are held for their minimum holding period, except as described in "Item 5: Fees and Compensation"; (c) one-day settlement (e.g., the proceeds from a sale are available in the account on the next market day) on the sale of most mutual funds and two- day settlement on the sale of ETFs; (d) on-line access at no charge for clients to monitor account activity and to get copies of recent monthly, year-end, and tax-reporting statements; (e) year-end tax-reporting information; (f) the custodian provides trading execution software, electronic detailed snapshots and trading history of all accounts, electronic trade confirmations of all trades placed, electronic monthly and year-end statements for all accounts, and a full range of back-office support staff and functions; and (g) working with one broker-dealer and trading platform simplifies and reduces the chance of error in our advisory functions.

Broker-dealers may make certain research and brokerage services available at no additional cost to the Firm. These services may be directly from independent research companies, as selected by the Firm. Research products and services provided by broker-dealers may include research reports on recommendations or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; and other products or services that provide lawful and appropriate assistance by broker-dealers to the Firm in its investment decision-making responsibilities.

We do not use client brokerage commissions to obtain research or other products or services. The aforementioned research and brokerage services are used by the Firm to manage accounts for which we have investment discretion. Without arrangements like these, the Firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving these services, we may have an incentive to continue to use or expand the use of the custodian's services. The Firm examined this potential conflict of interest when we chose to enter into the relationship with a custodian, and we generally believe that the relationship is in the best interest of our clients.

Our clients may pay a commission to the custodian that is higher than another custodian might charge to effect the same transaction. In seeking best execution, the determinative factor is not necessarily the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a custodian's services, including factors such as the value of research provided, execution capability, and commission rates. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

### **12.A.1 Research and Other Soft Dollar Benefits**

We do not direct client transactions to a particular broker-dealer in return for soft dollar benefits. Although the investment research products and services that may be obtained by the Firm will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.



### **12.A.2 Brokerage for Client Referrals**

We presently do not receive client referrals from broker-dealers.

### **12.A.3 Directed Brokerage**

We presently do not permit clients to direct brokerage.

## **12.B Aggregation of Securities Transactions in Client Accounts**

We perform investment management services for various clients. There are occasions on which individual equities and ETFs may be transacted as part of concurrent authorizations to purchase or sell the same individual equities and ETFs for numerous accounts served by the Firm, which involve accounts with similar investment objectives ("block transactions"). When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is equitable to the accounts involved. We attempt to allocate trade executions in an equitable manner, taking into consideration client objectives, current asset allocation and availability of funds. We are not required to engage in block transactions. Due to client-specific scenarios, we may not always use block transactions.

## **Item 13: Review of Accounts**

### **13.A Periodic Account Reviews and Reviewers**

The President assisted by the Vice President generally reviews the clients' holdings on a daily basis.

### **13.B Other Account Review Triggers**

Factors which may trigger a more detailed level of review include changes in the market, tax considerations, size of trade, size of allocations to market sectors, information about certain securities, conversations with the clients, among other factors.

### **13.C Content of Regular Reports**

We do not provide regular reports or create account statements. However, we may provide ad-hoc customized reports showing performance or other information from time to time. Also, clients should receive monthly statements directly from the custodian. These statements show all trades made in the client's account, the securities positions and the account value. The clients may be able to obtain information about their accounts directly from the custodian through the custodian's website on a real-time basis.

## **Item 14: Client Referrals and Other Compensation**

### **14.A Incoming Referrals**

Parker Investment does not compensate third-parties for referrals to Parker Investment. Additionally, Parker Investment does not receive any economic benefits from non-clients as

a result of our provision of investment advice or advisory services to clients, with the exception of research or execution-related products or services that may be provided by the broker-dealers that we use to execute client transactions. Please refer to the "Brokerage Practices" section above for additional information on these products or services.

#### **14.B Other Compensation**

We do not compensate anyone, either directly or indirectly, for client referrals.

### **Item 15: Custody**

All client funds and securities are maintained by a qualified custodian.

It is the custodian's responsibility to provide clients with account statements, confirmations of trading activity, tax forms and at least quarterly account statements. We urge all clients to review the custodian's statements to confirm that all account transactions, including deductions to pay our management fees, remain proper and to contact us with any questions. We urge all clients that receive any reports from Parker Investment to review those reports and to contact us with any questions.

### **Item 16: Investment Discretion**

We accept all clients on a discretionary basis. Each client completes and signs our Investment Management Agreement ("IMA") which includes a Limited Power of Attorney ("LPOA"), giving us the authority to carry out various activities in the account, subject to any account specific or client specific instructions. We then direct investment of the client's portfolio using our discretionary authority.

Restrictions on our discretionary authority may be set by the client on an account by account basis. A client may give us instructions regarding the allocation of an account between different asset classes, such as fixed income, equities, and cash, or may instruct us to purchase or sell specific securities or specific types of securities. We reserve the right to not accept requests to purchase or sell securities which are not highly liquid or securities which we do not follow.

### **Item 17: Voting Client Securities**

We do not accept proxy authority to vote client securities. The custodian of the account normally provides proxy materials directly to the client. Clients may contact us with questions relating to proxy procedures and proposals; however, we generally do not research particular proxy proposals.

### **Item 18: Financial Information**

Parker Investment does not have any financial commitments that impair our ability to meet our contractual obligations to our clients.