

Firm Brochure
(Part 2A of Form ADV)

FIRMNAME
ADDRESS
CITY, STATE ZIP
PHONE
FAX
WEBSITE
EMAIL

This brochure provides information about the qualifications and business practices of FIRMNAME. If you have any questions about the contents of this brochure, please contact us at: PHONE, or by email at: EMAIL. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about FIRMNAME is available on the SEC's website at www.adviserinfo.sec.gov

DATE

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

Code of Ethics

The employees of FIRMNAME have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

FIRMNAME and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the FIRMNAME *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of FIRMNAME is _____. He/she reviews all employee trades each quarter. His/her trades are reviewed by _____. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

FIRMNAME does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. FIRMNAME recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

FIRMNAME recommends discount brokerage firms and trust companies (qualified custodians), such as _____. FIRMNAME is an advisor with _____.

FIRMNAME *DOES/DOES NOT* receive fees or commissions from any of these arrangements.

Best Execution

FIRMNAME reviews the execution of trades at each custodian each quarter. The review is documented in the FIRMNAME *Compliance Manual*. Trading fees charged by the custodians is also reviewed on a quarterly basis. FIRMNAME does not receive any portion of the trading fees.