

Uniform Application for Investment Adviser Registration

Part II - Page 1

Name of Investment Adviser: Sterling Wealth Advisors, Inc.				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone number:
8201 Peters Road, Suite 1000	Plantation	FL	33324	(954) 771-1313

This part of Form ADV gives information about the investment adviser and its business for the use of clients. The information has not been approved or verified by any governmental authority.

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

1. **A. Advisory Services and Fees.** (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instructions below.)

Applicant:

<input type="checkbox"/>	(1) Provides investment supervisory services	%
<input checked="" type="checkbox"/>	(2) Manages investment advisory accounts not involving investment supervisory services	40 %
<input checked="" type="checkbox"/>	(3) Furnishes investment advice through consultations not included in either service described above	50 %
<input type="checkbox"/>	(4) Issues periodicals about securities by subscription	%
<input type="checkbox"/>	(5) Issues special reports about securities not included in any service described above	%
<input type="checkbox"/>	(6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities	%
<input checked="" type="checkbox"/>	(7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	10 %
<input type="checkbox"/>	(8) Provides a timing service	%
<input type="checkbox"/>	(9) Furnishes advice about securities in any manner not described above	%

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? Yes No

C. Applicant offers investment advisory services for: (check all that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input checked="" type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input checked="" type="checkbox"/> (3) Fixed Fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. **Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | I. Options contracts on: |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input checked="" type="checkbox"/> (1) securities |
| <input type="checkbox"/> (3) foreign issuers | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | J. Futures contracts on: |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| <input type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> E. Certificates of deposit | K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input checked="" type="checkbox"/> (1) real estate |
| G. Investment company securities: | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (2) variable annuities | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|--|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Long term purchases (securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases (securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No

(If yes, describe these standards on Schedule F.)

6. Education and Business Background

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- formal education after high school
- year of birth
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
 - (1) broker-dealer
 - (2) investment company
 - (3) other investment adviser
 - (4) financial planning firm
 - (5) commodity pool operator, commodity trading adviser or futures commission merchant
 - (6) banking or thrift institution
 - (7) accounting firm
 - (8) law firm
 - (9) insurance company or agency
 - (10) pension consultant
 - (11) real estate broker or dealer
 - (12) entity that creates or packages limited partnerships

(For each checked in box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes No

(If yes, describe on Schedule F the partnerships and what they invest in.)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes No

(If yes, describe on Schedule F)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

For those clients to whom the Registrant provides investment advisory services, account reviews shall be conducted no more frequently than quarterly. All investment advisory clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with the Registrant on an annual basis.

B. Describe below the nature and frequency of regular reports to clients on their accounts.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the client accounts.

12. Investment or Brokerage Discretion.

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:
- | | | |
|--|-------------------------------------|-------------------------------------|
| (1) securities to be bought or sold? | Yes | No |
| | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | Yes | No |
| | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | Yes | No |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (4) commission rates paid? | Yes | No |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- B. Does applicant or a related person suggest brokers to clients? Yes No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|-------------------------------------|-------------------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes | No |
| | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes | No |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? Yes No

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Applicant: Sterling Wealth Advisors, Inc.	SEC File Number: 801-	Date: 7/2010
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
Item 1D	<p><u>EXECUTIVE SUMMARY:</u></p> <p><i>Business Focus</i> Sterling Wealth Advisors, Inc., hereinafter referred to as “the Company”, is a “fee-only” registered investment advisory firm. As such, the Company offers to provide a broad array of financial planning and investment advisory services to individuals who desire a high degree of personalized and professional service.</p> <p><i>Mission Statement</i> The Company’s mission is to assist their clients with income and tax planning strategies designed to enhance the client’s overall financial performance; while helping clients to manage volatility, risk and various other challenges associated with making sound investment decisions in achieving their financial goals.</p> <p>To accomplish this objective, the Company prepares a written financial plan that serves to empower the client with the education needed to make sound investment decisions. In addition, the Company offers other alternative financial services on a continuing or limited engagement basis, depending on the need or request of the client.</p> <p><u>INVESTMENT ADVISORY & FINANCIAL PLANNING SERVICES</u></p> <p>The Company provides investment advisory services on both a discretionary and non-discretionary basis, and furnishes advice to clients on matters not involving securities only as a part of a total financial planning process. The focus of the Company is to perform a full financial review on each client, which is very comprehensive and completely tailored to the client’s specific concerns as it pertains to their income needs and tax responsibilities.</p> <p>The financial planning process incorporates four (4) types of service that a client may choose from depending on their needs and/or desires. The level of services offered to clients are: (a) Financial Overview (b) Financial Checkup/Project Retainer, (c) Complete Financial Plan; and (d) Full Financial Planning and Investment Advisory Retainer. Such services are described in greater detail below along with the fee schedule, management requirements, refund and termination provisions:</p> <p>(a) Financial Overview This is an overview of a client’s financial situation. The client will receive an overall review (including a net worth summary) with basic recommendations for improvement. The recommendations will be presented in one two-hour meeting with Elizabeth Barrett, MA, CFP®. The fee for a Financial Overview is \$950. A \$100 discount will be applied for family members of current clients or for referral by a current client. A \$200 discount will be applied to children of current clients.</p> <p>(b) Consulting/Project Retainer This is a level of service for clients with less than \$200,000 in investment assets. This does not constitute a comprehensive financial plan, and does not include implementation of any recommendations. Since we believe this arrangement is rarely in the client’s best interest, we reserve the right to refuse to only consult on one financial area when we believe it’s not in the best interest of the client.</p> <p>(c) Complete Financial Review/Plan This plan is very comprehensive and completely tailored to the client’s specific concerns and financial situation. The plan does <u>not</u> include help with implementation of any recommendations (i.e., investments, wills, tax preparation, etc.). When the analysis has been performed and the recommendations have been presented to the client, the engagement is complete. Should the client</p>

Complete amended pages in full, circle amended items and file with execution page (page 1).

need or desire future consultations with the company, the client is responsible for initiating contact and re-engaging the Company for these services.

(d) Full Financial Planning and Investment Advisory Retainer

We concentrate on providing comprehensive financial plans for our clients. However, since the effectiveness of any plan lies in its implementation, most clients request our help in executing their plan and working along side them throughout the year as they move toward their goals.

An Investment Advisory Retainer Agreement is signed for any ongoing work beyond the initial financial plan. This type of service includes our monitoring of the plan’s progress, including implementation of investment recommendations, and coordinating the efforts of attorneys, CPAs, insurance agents, portfolio managers, and other professional advisors.

PENSION CONSULTING SERVICES

In addition to the above, the registrant may also provide consulting services to sponsors and or participants of self directed retirement plans. The terms and conditions of any such engagement, including compensation to be paid to the registrant will be set forth in a separate written agreement between the sponsor and the registrant.

Personalized investment advice will not be provided to plan participants regarding their plan assets. However, plan participants who wish to engage the Company for individualized financial planning or consulting services regarding other assets outside the scope of the qualified plan may do so by executing a separate written agreement, including separate fees and fee payment arrangements, with the Company.

FEES

For a complete financial plan, the Company generally requires a minimum fee of \$5,000.

For clients who choose to engage the Company to provide ongoing financial planning services and investment advisory implementation services, the Company generally requires a financial planning minimum retainer of \$5000 (which includes the initial plan preparation) plus a fee for investment implementation based on the assets under management as follows:

<u>Assets</u>	<u>Annual Fee</u>
First 5,000,000	1.00%
Next 5,000,000	0.50%
Additional assets	0.35%

The above fees are minimum fees. Depending on the specific client circumstances and the amount of implementation services required, a client may pay more than the minimum fee for the plan and its implementation. The Company may charge a lesser minimum fee based upon certain criteria (i.e. existing financial planning client, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.)

A client can terminate the contract engagement at any time, and the balance of any unearned fee will be refunded.

Billing

Except for the Financial Overview, payment for which is due upon engagement, for all other financial planning and consulting services, 50% of the quoted fee is due upon engagement, and the remainder is due upon completion of the project or plan.

For new clients receiving ongoing financial planning and investment implementation services, annual fees will be determined upon engagement for the first year of the engagement, whether or not the first engagement year coincides with the calendar year. After the first anniversary of the engagement, a pro-rated fee will be calculated to compensate the Company for services to be rendered from the first anniversary to the end of that calendar year, when the client will join existing clients in a January-December fee year.

	<p>For <u>renewing</u> clients receiving ongoing financial planning and investment implementation services, each client’s annual fee is determined based upon the value of the assets as of September 30th of each preceding calendar year. Annual fees are non-negotiable once agreed to and will be split into two payments, one due in January, the other in July.</p> <p>All invoices are due immediately upon receipt. For clients who have engaged the Company to provide ongoing planning and implementation services, the <i>Investment Advisory Agreement</i> may permit the account custodian to debit the account and remit payment to the Company in accordance with required regulatory procedures. The total investment advisory fee may not be required to be prepaid more than six months in advance.</p> <p><i>Fee Exclusions</i></p> <p>The above fees are exclusive of any transaction fees, service or account charges, and load or redemption charges that may be imposed by a fund company, custodian or broker/dealer. In addition, clients are advised when purchasing mutual funds, that all fees paid to the Company for advisory services listed above are separate from the fees and expenses charged by the fund or the fund manager. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund’s prospectus. Clients are encouraged to carefully read the fund prospectus.</p> <p><u>MISCELLANEOUS</u></p> <p>Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Registrant) will be profitable or equal any specific performance level(s).</p> <p>If requested by the client, the Registrant may provide consulting services regarding non-investment related matters such as estate planning, tax planning, insurance, etc. Neither the Registrant, nor any of its representatives, serves as an attorney, accountant, or insurance agent, and no portion of the Registrant’s services should be construed as same. To the extent requested by a client, the Registrant may recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, insurance agents, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant.</p> <p>A copy of the Company’s Form ADV Part II will be provided to each client prior to or at the same time as the client signs an agreement with the Company. Any client who has not received a copy of the Form ADV Part II at least forty-eight (48) hours prior to signing an agreement shall have five (5) business days after signing the agreement to terminate the Company’s services without penalty.</p> <p>Agreements may be terminated by either party upon receipt of written notice. The balance of any unearned fee shall be refunded to the client upon termination.</p> <p>In performing its services, the Company shall not be required to verify any information received from the client or from the client’s other professionals, and is expressly authorized to rely thereon. Each client is advised that it remains the client’s responsibility to promptly notify the Company if there is ever any change in the client’s financial situation or investment objectives for the purpose of reviewing/evaluating/revising the Company’s previous recommendations and/or services.</p>
Item 5	<p><u>EDUCATION AND BUSINESS STANDARDS:</u></p> <p>Investment advisor representatives retained by the Company are required to have a bachelor’s degree from an accredited institution, investment experience in fields directly related to financial planning and/or have the required examinations and qualifications to act as such representative. Advanced degrees and the right to use trademark “CFP®” and “Certified Financial Planner®” are preferred.</p>

Item 6	<p>ELIZABETH A. BARRETT Born: 1964 Educational Background: Bryan College, BA Trinity International University, MA Certified Financial Planner (CFP) Accredited Investment Fiduciary (AIF) NASD Exam: Series 65 Business Background: Sterling Wealth Advisors, Inc., President & CEO, 7/97–Present</p>
Item 7C	<p>Elizabeth owns a separate company, Cambridge Consulting, a sole proprietorship that conducts seminars on various topics (typically related to investing or financial issues) and is typically paid for these seminars. These seminars are not marketed to advisory clients. She also produces books and continuing education materials for these seminars, which are sold.</p>
Item 9E	<p>The Company has implemented an investment policy relative to personal securities transactions. This investment policy is part of the Company’s overall Code of Ethics which serves to establish a standard of business conduct that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.</p> <p>In accordance with Section 204A of the Investment Advisors Act of 1940, the Company also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Company or any person associated with the Company.</p>
Item 10	<p>Please see the response in Item 1D, above, related to the Company’s minimum fees.</p>
Items 12A and 12 B	<p>Please see the previous responses set forth on this Schedule F to Item 1D. In addition, to the extent applicable to the transactions to be effected, Registrant’s general policies relative to the execution of client securities brokerage transactions are as follows:</p> <p>Execution of Brokerage Transactions (when applicable). If requested, Registrant will arrange for the execution of securities brokerage transactions for the account through broker-dealers that Registrant reasonably believes will provide "best execution." In seeking “best execution,” the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services including execution capability, commission rates, and responsiveness. Accordingly, although Registrant will seek competitive commission rates, it may not necessarily obtain the lowest possible commission rates for account transactions.</p> <p>Over-the-Counter (OTC) securities transactions for Registrant’s clients are generally effected on an agency basis, which involve the services of two (2) separate broker-dealers: (1) a “dealer” or “principal” acting as market-maker; and (2) the executing broker-dealer that acts in an agency capacity for the client’s account. Dealers executing principal transactions typically include a mark-up/down, which is included in the offer or bid price of the securities purchased or sold. In addition to the dealer mark-up/down, the client will also incur the transaction fee imposed by the executing broker-dealer. Registrant does not receive any portion of the dealer mark-up/down or the executing broker-dealer transaction fee.</p> <p>Registrant may (but is not obligated to) combine or “batch” client orders to obtain “best execution,” to negotiate more favorable commission rates or to allocate equitably among Registrant’s clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among Registrant's clients in proportion to the purchase and sale orders placed for each client account on any given day.</p> <p>The client may direct Registrant to use a particular broker-dealer (subject to Registrant’s right to decline and/or terminate the engagement) to execute some or all transactions for the client's account. In such event, the client will negotiate terms and arrangements for the account with that broker-</p>

	<p>dealer, and Registrant will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Registrant. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.</p> <p>In the event that the client directs Registrant to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Registrant.</p> <p>Proxy Voting Policy. The Registrant does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.</p>
Item 13A	<p>Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, the Company may receive from a particular broker-dealer/custodian, without cost and/or at a discount, support services which allow the Company to better monitor and service client accounts maintained at a particular broker-dealer/custodian.</p> <p><u>The Company's President, Elizabeth A. Barrett, MA, CFP, AIF, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest any such arrangement may create.</u></p>