



ERISA Fiduciary Advisors, Inc.

1160 Birchwood Road

Weston, Florida 33327

954-385-5331

www.efadvisor.com

February 5, 2014

This Brochure provides information about the qualifications and business practices of ERISA Fiduciary Advisors, Inc. ["EFA"]. If you have any questions about the contents of this Brochure, please contact us at 954-385-5331 or via email (tom@efadvisor.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

ERISA Fiduciary Advisors, Inc. is a registered investment EFA. Registration of an Investment EFA does not imply any level of skill or training. The oral and written communications of an EFA provide you with information about which you determine to hire or retain an EFA.

Additional information about ERISA Fiduciary Advisors, Inc. also is available on the SEC's website at www.investor.gov in the tools section click on Investment Professionals Background Check.

Item 2 - Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated February 5, 2014 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information.

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

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

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Thomas B. Bastin, President at 954-385-5331 or tom@efadvisor.com. Our Brochure is also available on our web site www.efadvisor.com, also free of charge.

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

Item 3 - Table of Contents

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

Brochure Supplement(s)

Item 4 – Advisory Business

ERISA Fiduciary Advisors, Inc.’s (“EFA”) principal service is providing fee-based investment advisory services predominantly to retirement plans. Founded in 2005 EFA is owned 50% by Thomas B. Bastin and 50% by Bradley L. Larsen. As of 12/31/13 EFA manages \$502,047,695 of assets in a discretionary manner for 23 retirement plan clients, \$42,304,587 in a non-discretionary manner for 14 retirement plan clients. In total EFA provides investment advisor services for \$544,352,281.

EFA’s role is to create model asset allocation portfolios using various investment funds that they monitor. EFA’s primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. EFA uses exchange listed securities, over-the-counter securities, corporate debt securities, municipal securities, mutual fund shares, guaranteed and separate accounts and United States government securities to accomplish this objective. EFA measures and selects mutual funds by using various criteria, such as the fund manager’s tenure, and/or overall career performance. EFA may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. EFA may recommend specific stocks to increase sector weighting and/or dividend potential. EFA may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. EFA may recommend selling positions for reasons that include, but are not limited to business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client’s risk tolerance.

Pension and Profit Sharing Plan Clients:

EFA offers two types of Fiduciary services to retirement plan sponsors. We will provide either a co-fiduciary service with the plan sponsor having final say over the investment lineup, or a discretionary fiduciary service where we select the investment lineup and the plan sponsor signs off on it. In either scenario EFA does accept liability for serving as a fiduciary for the plan.

EFA does not trade for an account or have any type of discretion over quantity of securities selected by its clients. EFA has no access to the money deposited into the accounts. Investment recommendations will be in the form of “model Portfolios”. EFA’s clients (Participants in 401(k) plans) will choose what model they want to have their 401(k) assets invested in. At the end of each year, the participants will have the option to elect automatic rebalancing of their portfolio.

Item 5 – Fees and Compensation

All fees are subject to negotiation. The specific manner in which fees are charged by EFA is established in a client’s written agreement with EFA. EFA will generally bill its fees on a quarterly basis. Clients may elect to be billed in advance or arrears each calendar quarter except for those clients working with record-keepers that define for them the method of payment (advance or arrears). Clients may also elect to be billed directly for fees or authorize the record-keeper to debit fees to be paid to EFA. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Retirement Plan Clients

EFA intends to be compensated for its investment advisory services by charging fees for the assets under management, hourly fees and/or fixed fees.

Management Fee: Pursuant to an investment advisory contract signed by each client, the client will pay EFA in arrears or advance a quarterly Management Fee, based on the account’s market value as of the close of business on the first or last business day of the period to be billed. With respect to retirement plan clients EFA has a stated fee schedule that is based upon both the number of plan participants as well as the total plan assets associated with each client.

There are a number of factors listed below this fee chart that could alter pricing for an individual client. These factors will be reviewed and discussed prior to contracting. In general this is the base chart which can be altered to reflect the additional factors listed below.

| Participants | < \$2.5m | \$2.5m to \$4m | \$4m to \$6m | \$6m to \$8m | \$8m to \$10m | \$10m to \$15m | > \$15m |
|---------------------|--------------------|-----------------------|---------------------|---------------------|----------------------|-----------------------|-------------------|
| > 200 | 0.50% | 0.46% | 0.43% | 0.40% | 0.32% | 0.26% | Negotiable |
| 100 to 199 | 0.50% | 0.45% | 0.42% | 0.36% | 0.30% | 0.24% | Negotiable |
| < 100 | 0.50% | 0.44% | 0.41% | 0.34% | 0.28% | 0.22% | Negotiable |

Additional Pricing Factors:

1. Frequency of enrollment meetings per year
2. Number of enrollment locations to visit per year
3. Travel time and expense to get to locations where enrollment meetings are held
4. Frequency of one on one meetings provided in person per year

5. Number of locations at which one on one meetings are provided in person each year
6. Travel time and expense to get to locations where one on one meetings are held
7. Expected participant call volume each year
8. Expected employer call volume each year
9. Extent, frequency and time required to prepare non-standard plan specific reporting
10. Whether standard reports are provided each year
11. Expected interaction between EFA and the third party plan administrator each year
12. Expected interaction between EFA and the Record keeper each year
13. Expected interaction between EFA and the Custodian each year
14. Whether EFA will be expected to vote proxies
15. Frequency of Investment Meetings each year
16. Location of Investment meetings (location, travel & expense)
17. Electronic vs. print based reporting
18. Volume of binders prepared for print based reporting
19. Administrative meetings EFA must attend each year (location, travel & expense)
20. Additional client requests for non-standard services

Fixed Fees: Some clients will contract to have investment advisory advice provided based on a fixed fee rather than based on the assets under management. This fee will be negotiated in advance. Once again those fees can be impacted by the additional factors cited above. Payment is due within 30 days if directly invoiced.

Individual Clients:

All fees charged by EFA for its investment advisory services are separate and in addition to those fees charged by individual money managers, product sponsors, and/or executing broker/dealers. Individual Client Accounts are billed in arrears upon completion of an investment review. Individual Clients have the option of determining how often they want EFA to review their investment options. EFA only charges Individual Clients after it has performed a review. Payment is due within 30 days if directly invoiced.

All fees paid to EFA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without the services of EFA. In that case, the client would not receive the services provided by EFA which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by EFA to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

In addition, Client is responsible for all transactional costs borne by their account. These costs will include custodial fees, execution fees and related securities transaction fees. EFA will provide investment advisory services and portfolio management services and will not provide securities execution, custodial and other administrative services. At no time will EFA accept or maintain custody of a client's funds or securities.

Clients may request to terminate their advisory contract with EFA, in whole or in part, by giving thirty days advance written notice (or shorter if their contract allows). Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client.

The basic fee chart for Individual Clients is listed below. Additional factors that can increase or decrease the fee include the nature of the client, their assets and expectations with respect to investment options utilized.

| Account Assets | Review Fee |
|------------------------|-------------------|
| <\$500,000 | \$300 |
| <\$1,000,000 | \$600 |
| <\$2,000,000 | \$900 |
| >\$2,000,000 | Negotiable |

Item 12 further describes the factors that EFA considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

EFA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

EFA provides portfolio management services to corporate pension and profit-sharing plans (along with their participants), Taft-Hartley plans, charitable institutions, foundations, endowments, and municipalities.

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

Investing in securities involves risk of loss that clients should be prepared to bear. EFA follows a strategy of buy and hold whether it is for Individual or Retirement Plan clients. EFA does not promote active trading and plays no role in the custody, sale or purchase of securities. EFA primarily recommends the use of mutual funds. The diversification provided by mutual funds and ease of review allows EFA to construct model portfolios that enable investors to make a risk based decision on how to invest. Mutual funds also make it easy to differentiate by asset class allowing EFA to select funds that can meet a disparate group of needs given many retirement plans have participants ranging from age 21 to age 80 and conservative to aggressive.

Risk associated with mutual funds is the same as those buying individual stocks or bonds. Market conditions will impact mutual funds because their holdings are subject to the market. A mutual fund investor could just as easily lose money should the underlying holdings depreciate in value. In addition, a quick liquidation of assets within a mutual fund could drive down its worth regardless of the underlying assets. Cost is another factor to take into consideration as some mutual funds can be more expensive than others and/or impose redemption fees. In addition, the total holdings within a mutual fund can impact performance as the mere size may impair a fund manager's ability to generate profit. Clients should consider many factors before deciding whether mutual funds are best for their situation. EFA has elected to work with mutual funds because we believe they offer the typical investor the best opportunity to achieve diversification with proper investment management.

Item 9 – Disciplinary Information

Registered investment EFAs are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of EFA or the integrity of EFA's management. EFA has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

The principals of EFA do hold insurance licenses. Although the selling of insurance is quite limited and in most cases does not occur during any given year EFA does maintain these licenses to assist clients with their insurance needs. For instance, the use of non-qualified retirement plans are often funded with insurance products. Since compensation for the sale of insurance products does vary from contracts with have with clients EFA does disclose said compensation prior to the sale of insurance products.

Item 11 – Code of Ethics

EFA has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at EFA must acknowledge the terms of the Code of Ethics annually, or as amended.

EFA anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which EFA has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which EFA, its affiliates and/or clients, directly or indirectly, have a position of interest. EFA's employees and persons associated with EFA are required to follow EFA's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of EFA and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for EFA's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of EFA will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of EFA's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between EFA and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with EFA's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. EFA will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

EFA's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Tom Bastin at 866-606-4015 or tom@efadvisor.com.

It is EFA's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. EFA will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an EFA, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment EFA in relation to a transaction in which the investment EFA, or any person controlled by or under common control with the investment EFA, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an EFA is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

EFA does not accept Soft dollar benefits. EFA will assist retirement plan clients in monitoring the receipt of soft dollar benefits by others such as the record-keeper and custodian in order to capture and utilize for the client's behalf.

Item 13 – Review of Accounts

EFA reviews all retirement plan client accounts on a quarterly basis. Each quarter the client is provided a written investment management review of their investment options and once per year they also receive a written fiduciary practices report, fee analysis, Section 404(c) checklist and various EFA notices. In addition, EFA stores all reporting including the EFA Privacy Notice, E&O Certificate, CEFEX Certification and Form ADV online for clients to access.

Item 14 – Client Referrals and Other Compensation

EFA has no client referrals or other compensation arrangements. All EFA compensation is paid by our clients. EFA goes to great lengths to avoid all appearances of conflict or impropriety.

Item 15 – Custody

EFA does not have custody of Client assets. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets in order to review fees from their other vendors and/or investment options.

Item 16 – Investment Discretion

EFA usually receives discretionary authority from the client at the outset of an advisory relationship to determine which asset classes and investment options are to be utilized. EFA never selects the amount of securities to be bought or sold. Those amounts are determined by the individual, or in the case of retirement plans by the participants in the plan. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, EFA observes the investment policies, limitations and restrictions of the clients for which it advises. EFA does not actually trade securities and with respect to retirement plans has clients sign off acknowledging that investment option changes will take place. With respect to all clients Investment guidelines and restrictions must be provided to EFA in writing so they can be documented within an investment policy statement.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, EFA does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. EFA may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about EFA's financial condition. EFA 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. The individual owners of EFA have not been subject to a bankruptcy proceeding. EFA has no debt and operates entirely from revenue generated.



ERISA Fiduciary Advisors, Inc.

Thomas B. Bastin

1160 Birchwood Road, Weston, Florida 33327

954-385-5331

February 5, 2014

This Brochure Supplement provides information about Thomas B. Bastin that supplements the ERISA Fiduciary Advisors, Inc. Brochure. You should have received a copy of that Brochure. Please contact Thomas B. Bastin if you did not receive ERISA Fiduciary Advisors, Inc. Brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas B. Bastin is available on the SEC's website at www.investor.gov.

Item 2- Educational Background and Business Experience

Thomas B. Bastin (Born: 1964)

Education: Bachelor of Arts from Purdue University (1986); Juris Doctor from Nova Southeastern University (1993); an LLM in Taxation from The University of Miami School of Law (1994); CEBS (certified employment benefits specialist) from the Wharton School of Finance; and an AIF designation (Accredited Investment Fiduciary) from the Center for Fiduciary Studies at the University of Pittsburgh

Licenses: Mr. Bastin holds the Series 65 securities license.

Mr. Bastin has spent the past 9 years working at EFA as both President and General Counsel.

Item 3- 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 each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Bastin is not actively engaged in the pursuit of any other business activities. 100% of his time is devoted to EFA. Although insurance licensed Mr. Bastin has not sold an insurance product to an individual for several years.

Item 5- Additional Compensation

No additional compensation is received. EFA does not accept sales awards or undisclosed compensation from vendors. EFA does not accept non-cash items of value from vendors. Mr. Bastin does not accept any of the above either.

Item 6 - Supervision

Thomas B. Bastin is the Chief Compliance Officer for EFA. Mr. Bastin supervises his own activity as a result. In 2011 the SEC conducted a limited scope audit of EFA. A no finding letter was received at the conclusion of the SEC audit.



ERISA Fiduciary Advisors, Inc.

Bradley L. Larsen

532 Colorado Avenue, Stuart, Florida 34996

954-385-5331

February 5, 2014

This Brochure Supplement provides information about Bradley L. Larsen that supplements the ERISA Fiduciary Advisors, Inc. Brochure. You should have received a copy of that Brochure. Please contact Thomas B. Bastin if you did not receive ERISA Fiduciary Advisors, Inc. Brochure or if you have any questions about the contents of this supplement.

Additional information about Bradley L. Larsen is available on the SEC's website at www.investor.gov.

Item 2- Educational Background and Business Experience

Bradley L. Larsen (Born: 1963)

Education: Bachelor of Science from the University of Florida (1985); AIF designation (Accredited Investment Fiduciary) from the Center for Fiduciary Studies at the University of Pittsburgh. Licenses: Mr. Larsen holds the Series 65 License

Business: Birchtree Financial (2005 thru 2006); Securian Financial Services (2007 thru 2008). RIA for OneFiduciary Group LLC (May 2008 thru May 2009); RIA for ERISA Fiduciary Advisors, Inc, from May 2009 to present.

Mr. Larsen is an Executive Vice President with EFA.

Item 3- 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 each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Larsen is not actively engaged in the pursuit of any other business activities. 100% of his time is devoted to EFA. Although insurance licensed Mr. Larsen has not sold any insurance to an individual since 2009.

Item 5- Additional Compensation

No additional compensation is received. EFA does not accept sales awards or undisclosed compensation from vendors. EFA does not accept non-cash items of value from vendors. Mr. Larsen does not accept any of the above either.

Item 6 - Supervision

Thomas B. Bastin is the Chief Compliance Officer for EFA. Mr. Bastin supervises all of Mr. Larsen's activities. You can reach Mr. Bastin at the address listed below:

1160 Birchwood Road
Weston, Florida 33327
954-385-5331
tom@efadvisor.com



ERISA Fiduciary Advisors, Inc.

Jorge Martinez Fonts

1160 Birchwood Road, Weston, Florida 33327

954-385-5331

February 5, 2014

This Brochure Supplement provides information about Jorge Martinez Fonts that supplements the ERISA Fiduciary Advisors, Inc. Brochure. You should have received a copy of that Brochure. Please contact Thomas B. Bastin if you did not receive ERISA Fiduciary Advisors, Inc. Brochure or if you have any questions about the contents of this supplement.

Additional information about Jorge Martinez Fonts is available on the SEC's website at www.investor.gov.

Item 2- Educational Background and Business Experience

Jorge Martinez Fonts (Born: 1951)

Education: Bachelor of Arts in Economics from Rollins College; Master of Arts in Economics from the University of Florida and an AIF designation (Accredited Investment Fiduciary) from the Center for Fiduciary Studies at the University of Pittsburgh

Licenses: Mr. Fonts holds the Series 65 securities license.

Mr. Fonts joined EFA in January 2013.

Item 3- 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 each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Mr. Fonts is not actively engaged in the pursuit of any other business activities. 100% of his time is devoted to EFA. Although insurance licensed Mr. Fonts has not sold an insurance product for several years.

Item 5- Additional Compensation

No additional compensation is received. EFA does not accept sales awards or undisclosed compensation from vendors. EFA does not accept non-cash items of value from vendors. Mr. Fonts does not accept any of the above either.

Item 6 - Supervision

Thomas B. Bastin is the Chief Compliance Officer for EFA. Mr. Bastin supervises all of Mr. Font's activities. You can reach Mr. Bastin at the address listed below:

1160 Birchwood Road
Weston, Florida 33327
954-385-5331
tom@efadvisor.com

FORM ADV**UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY
EXEMPT REPORTING ADVISERS****Primary Business Name: ERISA FIDUCIARY ADVISORS, INC.****CRD Number: 137879****Annual Amendment - All Sections****Rev. 10/2012****2/7/2014 7:28:43 AM**

WARNING: Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.

Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you.

- A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):
ERISA FIDUCIARY ADVISORS, INC.
- B. Name under which you primarily conduct your advisory business, if different from Item 1.A.:
ERISA FIDUCIARY ADVISORS, INC.
- List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.*
- C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.), enter the new name and specify whether the name change is of
 your legal name or your primary business name:
- D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: **801-64931**
(2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:
- E. If you have a number ("CRD Number") assigned by the *FINRA's CRD* system or by the IARD system, your *CRD* number: **137879**
- If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.*
- F. *Principal Office and Place of Business*
- (1) Address (do not use a P.O. Box):
- | | | | |
|----------------------|----------------------|---------------|--------------------|
| Number and Street 1: | Number and Street 2: | | |
| 1160 BIRCHWOOD ROAD | | | |
| City: | State: | Country: | ZIP+4/Postal Code: |
| WESTON | Florida | UNITED STATES | 33327 |

If this address is a private residence, check this box:

List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest five offices in terms of numbers of employees.

(2) Days of week that you normally conduct business at your principal office and place of business:

Monday - Friday Other:

Normal business hours at this location:

8:00 AM - 5:00 PM

(3) Telephone number at this location:

954-385-5331

(4) Facsimile number at this location:

877-587-7571

G. Mailing address, if different from your principal office and place of business address:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

H. If you are a sole proprietor, state your full residence address, if different from your principal office and place of business address in Item 1.F.:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

Yes No

I. Do you have one or more websites?

If "yes," list all website addresses on Section 1.I. of Schedule D. If a website address serves as a portal through which to access other information you have published on the web, you may list the portal without listing addresses for all of the other information. Some advisers may need to list more than one portal address. Do not provide individual electronic mail (e-mail) addresses in response to this Item.

J. Provide the name and contact information of your Chief Compliance Officer: If you are an exempt reporting adviser, you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.

Name:

THOMAS B. BASTIN

Other titles, if any:

CHIEF COMPLIANCE OFFICER

Telephone number:

954-385-5331

Facsimile number:

877-587-7571

Number and Street 1:

1160 BIRCHWOOD ROAD

Number and Street 2:

| | | | |
|--------|---------|---------------|--------------------|
| City: | State: | Country: | ZIP+4/Postal Code: |
| WESTON | Florida | UNITED STATES | 33327 |

Electronic mail (e-mail) address, if Chief Compliance Officer has one:
TOM@EFADVISOR.COM

- K. Additional Regulatory Contact Person: If a person other than the Chief Compliance Officer is authorized to receive information and respond to questions about this Form ADV, you may provide that information here.

| | | | |
|----------------------|----------------------|---------------|--------------------|
| Name: | Titles: | | |
| BRADLEY L. LARSEN | EVP | | |
| Telephone number: | Facsimile number: | | |
| 561-722-4511 | 877-587-7571 | | |
| Number and Street 1: | Number and Street 2: | | |
| 532 COLORADO AVENUE | | | |
| City: | State: | Country: | ZIP+4/Postal Code: |
| STUART | Florida | UNITED STATES | 34996 |

Electronic mail (e-mail) address, if contact person has one:
BRAD@EFADVISOR.COM

- L. Do you maintain some or all of the books and records you are required to keep under Section 204 of the Advisers Act, or similar state law, somewhere other than your *principal office and place of business*? Yes No

If "yes," complete Section 1.L. of Schedule D.

- M. Are you registered with a *foreign financial regulatory authority*? Yes No

Answer "no" if you are not registered with a foreign financial regulatory authority, even if you have an affiliate that is registered with a foreign financial regulatory authority. If "yes," complete Section 1.M. of Schedule D.

- N. Are you a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934? Yes No

If "yes," provide your CIK number (Central Index Key number that the SEC assigns to each public reporting company):

- O. Did you have \$1 billion or more in assets on the last day of your most recent fiscal year? Yes No

- P. Provide your *Legal Entity Identifier* if you have one:

A legal entity identifier is a unique number that companies use to identify each other in the financial

marketplace. In the first half of 2011, the *legal entity identifier* standard was still in development. You may not have a *legal entity identifier*.

SECTION 1.B. Other Business Names

No Information Filed

SECTION 1.F. Other Offices

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest five offices (in terms of numbers of employees).

Number and Street 1:

532 COLORADO AVENUE

Number and Street 2:

City:

STUART

State:

Florida

Country:

UNITED STATES

ZIP+4/Postal Code:

34994

If this address is a private residence, check this box:

Telephone Number:

866-606-4015

Facsimile Number:

877-587-7571

SECTION 1.I. Website Addresses

List your website addresses. You must complete a separate Schedule D Section 1.I. for each website address.

Website Address: WWW.EFADVISOR.COM

Website Address: WWW.ERISAFIDUCIARIES.COM

Website Address: WWW.PRUDENTEXPERT.COM

Website Address: WWW.ERISA404C.COM

Website Address: WWW.STALEXIUS403B.COM

Website Address: WWW.MY401KDOCS.COM

Website Address: WWW.MY403BDOCS.COM

Website Address: WWW.ARTHREX401K.COM

SECTION 1.L. Location of Books and Records

No Information Filed

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

No Information Filed

Item 2 SEC Registration/Reporting

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration.

A. To register (or remain registered) with the SEC, you must check **at least one** of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an *annual updating amendment* to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to each of these items.

You (the adviser):

- (1) are a **large advisory firm** that either:
- (a) has regulatory assets under management of \$100 million (in U.S. dollars) or more, or
 - (b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent *annual updating amendment* and is registered with the SEC;
- (2) are a **mid-sized advisory firm** that has regulatory assets under management of \$25 million (in U.S. dollars) or more but less than \$100 million (in U.S. dollars) and you are either:
- (a) not required to be registered as an adviser with the *state securities authority* of the state where you maintain your *principal office and place of business*, or
 - (b) not subject to examination by the *state securities authority* of the state where you maintain your *principal office and place of business*;
- Click **HERE** for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority.*
- (3) have your *principal office and place of business* **in Wyoming** (which does not regulate advisers);
- (4) have your *principal office and place of business* **outside the United States**;
- (5) are an **investment adviser (or sub-adviser) to an investment company** registered under the Investment Company Act of 1940;
- (6) are an **investment adviser to a company which has elected to be a business development company** pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management;
- (7) are a **pension consultant** with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);
- (8) are a **related adviser** under rule 203A-2(b) that *controls*, is *controlled* by, or is under common *control* with, an investment adviser that is registered with the SEC, and your *principal office and place of business* is the same as the registered adviser;
- If you check this box, complete Section 2.A.(8) of Schedule D.*
- (9) are a **newly formed adviser** relying on rule 203A-2(c) because you expect to be eligible for SEC registration within 120 days;

If you check this box, complete Section 2.A.(9) of Schedule D.

- (10) are a **multi-state adviser** that is required to register in 15 or more states and is relying on rule 203A-2(d);

If you check this box, complete Section 2.A.(10) of Schedule D.

- (11) are an **Internet adviser** relying on rule 203A-2(e);
- (12) have **received an SEC order** exempting you from the prohibition against registration with the SEC;

If you check this box, complete Section 2.A.(12) of Schedule D.

- (13) are **no longer eligible** to remain registered with the SEC.

State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers

- C. Under state laws, SEC-registered advisers may be required to provide to *state securities authorities* a copy of the Form ADV and any amendments they file with the SEC. These are called *notice filings*. In addition, *exempt reporting advisers* may be required to provide *state securities authorities* with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your *notice filings* or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to your registration to stop your *notice filings* or reports from going to state(s) that currently receive them, uncheck the box(es) next to those state(s).

Jurisdictions

| | | | |
|--|-----------------------------|--|-----------------------------|
| <input type="checkbox"/> AL | <input type="checkbox"/> ID | <input type="checkbox"/> MO | <input type="checkbox"/> PA |
| <input type="checkbox"/> AK | <input type="checkbox"/> IL | <input type="checkbox"/> MT | <input type="checkbox"/> PR |
| <input type="checkbox"/> AZ | <input type="checkbox"/> IN | <input type="checkbox"/> NE | <input type="checkbox"/> RI |
| <input type="checkbox"/> AR | <input type="checkbox"/> IA | <input type="checkbox"/> NV | <input type="checkbox"/> SC |
| <input type="checkbox"/> CA | <input type="checkbox"/> KS | <input type="checkbox"/> NH | <input type="checkbox"/> SD |
| <input type="checkbox"/> CO | <input type="checkbox"/> KY | <input type="checkbox"/> NJ | <input type="checkbox"/> TN |
| <input type="checkbox"/> CT | <input type="checkbox"/> LA | <input type="checkbox"/> NM | <input type="checkbox"/> TX |
| <input type="checkbox"/> DE | <input type="checkbox"/> ME | <input type="checkbox"/> NY | <input type="checkbox"/> UT |
| <input type="checkbox"/> DC | <input type="checkbox"/> MD | <input type="checkbox"/> NC | <input type="checkbox"/> VT |
| <input checked="" type="checkbox"/> FL | <input type="checkbox"/> MA | <input checked="" type="checkbox"/> ND | <input type="checkbox"/> VI |
| <input type="checkbox"/> GA | <input type="checkbox"/> MI | <input checked="" type="checkbox"/> OH | <input type="checkbox"/> VA |
| <input type="checkbox"/> GU | <input type="checkbox"/> MN | <input type="checkbox"/> OK | <input type="checkbox"/> WA |
| <input type="checkbox"/> HI | <input type="checkbox"/> MS | <input type="checkbox"/> OR | <input type="checkbox"/> WV |
| | | | <input type="checkbox"/> WI |

If you are amending your registration to stop your notice filings or reports from going to a state that currently receives them and you do not want to pay that state's notice filing or report filing fee for the

coming year, your amendment must be filed before the end of the year (December 31).

SECTION 2.A.(8) Related Adviser

If you are relying on the exemption in rule 203A-2(b) from the prohibition on registration because you *control*, are *controlled by*, or are under common *control* with an investment adviser that is registered with the SEC and your *principal office and place of business* is the same as that of the registered adviser, provide the following information:

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser

SEC Number of Registered Investment Adviser
801 -

SECTION 2.A.(9) Newly Formed Adviser

If you are relying on rule 203A-2(c), the newly formed adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations:

- I am not registered or required to be registered with the SEC or a *state securities authority* and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.
- I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.

SECTION 2.A.(10) Multi-State Adviser

If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.

If you are applying for registration as an investment adviser with the SEC, you must make both of these representations:

- I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the *state securities authorities* in those states.
- I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the *state securities authorities* of those states.

If you are submitting your *annual updating amendment*, you must make this representation:

- Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the *state securities authorities* in those states.

SECTION 2.A.(12) SEC Exemptive Order

If you are relying upon an SEC *order* exempting you from the prohibition on registration, provide the following information:

Application Number:

803-

Date of *order*:

Item 3 Form of Organization

A. How are you organized?

- Corporation
- Sole Proprietorship
- Limited Liability Partnership (LLP)
- Partnership
- Limited Liability Company (LLC)
- Limited Partnership (LP)
- Other (specify):

If you are changing your response to this Item, see Part 1A Instruction 4.

B. In what month does your fiscal year end each year?

DECEMBER

C. Under the laws of what state or country are you organized?

State Country

Florida UNITED STATES

If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.

If you are changing your response to this Item, see Part 1A Instruction 4.

Item 4 Successions

Yes No

A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser?

If "yes", complete Item 4.B. and Section 4 of Schedule D.

B. Date of Succession: (MM/DD/YYYY)

If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.

SECTION 4 Successions

No Information Filed

Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.

Employees

If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).

A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.

3

B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?

3

(2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?

0

(3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?

0

(4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?

0

(5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?

3

(6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?

0

In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.

Clients

In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

C. (1) To approximately how many *clients* did you provide investment advisory services during your most recently completed fiscal year?

- 0
 - 26-100
 - 1-10
 - More than 100
 - 11-25
- If more than 100, how many?
(round to the nearest 100)

(2) Approximately what percentage of your *clients* are non-United States persons?
0%

D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships. The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, check "None" in response to Item 5.D.(1)(d) and do not check any of the boxes in response to Item 5.D.(2)(d).

(1) What types of *clients* do you have? Indicate the approximate percentage that each type of *client* comprises of your total number of *clients*. If a *client* fits into more than one category, check all that apply.

| | None | Up to 10% | 11-25% | 26-50% | 51-75% | 76-99% | 100% |
|--|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| (a) Individuals (other than <i>high net worth individuals</i>) | <input checked="" type="radio"/> | <input type="radio"/> |
| (b) <i>High net worth individuals</i> | <input checked="" type="radio"/> | <input type="radio"/> |
| (c) Banking or thrift institutions | <input checked="" type="radio"/> | <input type="radio"/> |
| (d) Investment companies | <input checked="" type="radio"/> | <input type="radio"/> |
| (e) Business development companies | <input checked="" type="radio"/> | <input type="radio"/> |
| (f) Pooled investment vehicles (other than investment companies) | <input checked="" type="radio"/> | <input type="radio"/> |
| (g) Pension and profit sharing plans (but not the plan participants) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| (h) Charitable organizations | <input checked="" type="radio"/> | <input type="radio"/> |
| (i) Corporations or other businesses not listed above | <input checked="" type="radio"/> | <input type="radio"/> |
| (j) State or municipal <i>government entities</i> | <input checked="" type="radio"/> | <input type="radio"/> |
| (k) Other investment advisers | <input checked="" type="radio"/> | <input type="radio"/> |
| (l) Insurance companies | <input checked="" type="radio"/> | <input type="radio"/> |
| (m) Other: | <input checked="" type="radio"/> | <input type="radio"/> |

(2) Indicate the approximate amount of your regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of *client*. If a *client* fits into more than one category, check all that apply.

| | <u>None</u> | <u>Up to 25%</u> | <u>Up to 50%</u> | <u>Up to 75%</u> | <u>>75%</u> |
|--|----------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| (a) Individuals (other than <i>high net worth individuals</i>) | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (b) <i>High net worth individuals</i> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (c) Banking or thrift institutions | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (d) Investment companies | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (e) Business development companies | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (f) Pooled investment vehicles (other than investment companies) | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (g) Pension and profit sharing plans (but not the plan participants) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| (h) Charitable organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (i) Corporations or other businesses not listed above | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (j) State or municipal <i>government entities</i> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (k) Other investment advisers | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (l) Insurance companies | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (m) Other: | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Compensation Arrangements

E. You are compensated for your investment advisory services by (check all that apply):

- (1) A percentage of assets under your management
- (2) Hourly charges
- (3) Subscription fees (for a newsletter or periodical)
- (4) Fixed fees (other than subscription fees)
- (5) Commissions
- (6) *Performance-based fees*
- (7) Other (specify):

Item 5 Information About Your Advisory Business - Regulatory Assets Under Management

Regulatory Assets Under Management

| | | Yes | No |
|---|--------------------|----------------------------------|--------------------------|
| F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios? | | <input checked="" type="radio"/> | <input type="radio"/> |
| (2) If yes, what is the amount of your regulatory assets under management and total number of accounts? | | | |
| | U.S. Dollar Amount | | Total Number of Accounts |
| Discretionary: | (a) \$ 502,047,695 | | (d) 23 |
| Non-Discretionary: | (b) \$ 42,304,587 | | (e) 14 |
| Total: | (c) \$ 544,352,282 | | (f) 37 |

Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.

Item 5 Information About Your Advisory Business - Advisory Activities

Advisory Activities

G. What type(s) of advisory services do you provide? Check all that apply.

- (1) Financial planning services
- (2) Portfolio management for individuals and/or small businesses
- (3) Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940)
- (4) Portfolio management for pooled investment vehicles (other than investment companies)
- (5) Portfolio management for businesses (other than small businesses) or institutional *clients* (other than registered investment companies and other pooled investment vehicles)
- (6) Pension consulting services
- (7) Selection of other advisers (including *private fund* managers)
- (8) Publication of periodicals or newsletters
- (9) Security ratings or pricing services
- (10) Market timing services
- (11) Educational seminars/workshops
- (12) Other(specify):

Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedule D.

H. If you provide financial planning services, to how many *clients* did you provide these services during your last fiscal year?

- 0
- 1 - 10
- 11 - 25
- 26 - 50
- 51 - 100
- 101 - 250
- 251 - 500
- More than 500

If more than 500, how many?
(round to the nearest 500)

In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

I. If you participate in a *wrap fee program*, do you (check all that apply):

- (1) *sponsor the wrap fee program?*
 (2) *act as a portfolio manager for the wrap fee program?*

If you are a portfolio manager for a wrap fee program, list the names of the programs and their sponsors in Section 5.I.(2) of Schedule D.

If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check either Item 5.I.(1) or 5.I.(2).

Yes No

J. In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?

SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies

No Information Filed

SECTION 5.I.(2) Wrap Fee Programs

No Information Filed

Item 6 Other Business Activities

In this Item, we request information about your firm's other business activities.

A. You are actively engaged in business as a (check all that apply):

- (1) broker-dealer (registered or unregistered)
- (2) registered representative of a broker-dealer
- (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (4) futures commission merchant
- (5) real estate broker, dealer, or agent
- (6) insurance broker or agent
- (7) bank (including a separately identifiable department or division of a bank)
- (8) trust company
- (9) registered municipal advisor
- (10) registered security-based swap dealer
- (11) major security-based swap participant
- (12) accountant or accounting firm
- (13) lawyer or law firm
- (14) other financial product salesperson (specify):

If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B, complete Section 6.A. of Schedule D.

- | | Yes | No |
|--|----------------------------------|----------------------------------|
| B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)? | <input checked="" type="radio"/> | <input type="radio"/> |
| (2) If yes, is this other business your primary business? | <input type="radio"/> | <input checked="" type="radio"/> |

If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.

- | | Yes | No |
|---|----------------------------------|-----------------------|
| (3) Do you sell products or provide services other than investment advice to your advisory clients? | <input checked="" type="radio"/> | <input type="radio"/> |

If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.

SECTION 6.A. Names of Your Other Businesses

No Information Filed

SECTION 6.B.(2) Description of Primary Business

Describe your primary business (not your investment advisory business):

If you engage in that business under a different name, provide that name:

SECTION 6.B.(3) Description of Other Products and Services

Describe other products or services you sell to your *client*, You may omit products and services that you listed in Section 6.B.(2) above.

ERISA CONSULTING SERVICES ARE PROVIDED AT TIMES TO CLIENTS FOR A FIXED FEE.

If you engage in that business under a different name, provide that name.

Item 7 Financial Industry Affiliations and *Private Fund* Reporting

In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your *clients*.

- A. This part of Item 7 requires you to provide information about you and your *related persons*, including foreign affiliates. Your *related persons* are all of your *advisory affiliates* and any *person* that is under common *control* with you.

You have a *related person* that is a (check all that apply):

- (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)
- (2) other investment adviser (including financial planners)
- (3) registered municipal advisor
- (4) registered security-based swap dealer
- (5) major security-based swap participant
- (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (7) futures commission merchant
- (8) banking or thrift institution
- (9) trust company
- (10) accountant or accounting firm
- (11) lawyer or law firm
- (12) insurance company or agency
- (13) pension consultant
- (14) real estate broker or dealer
- (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.

You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.

You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

Yes No

- B. Are you an adviser to any *private fund*?

If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions

to Part 1A. If another adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.

In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund's name.

SECTION 7.A. Financial Industry Affiliations

No Information Filed

SECTION 7.B.(1) Private Fund Reporting

No Information Filed

SECTION 7.B.(2) Private Fund Reporting

No Information Filed

Item 8 Participation or Interest in *Client* Transactions

In this Item, we request information about your participation and interest in your *clients'* transactions. This information identifies additional areas in which conflicts of interest may occur between you and your *clients*.

Like Item 7, Item 8 requires you to provide information about you and your *related persons*, including foreign affiliates.

Proprietary Interest in *Client* Transactions

- | | Yes | No |
|--|-----------------------|----------------------------------|
| A. Do you or any <i>related person</i> : | | |
| (1) buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ? | <input type="radio"/> | <input checked="" type="radio"/> |
| (3) recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))? | <input type="radio"/> | <input checked="" type="radio"/> |

Sales Interest in *Client* Transactions

- | | Yes | No |
|--|-----------------------|----------------------------------|
| B. Do you or any <i>related person</i> : | | |
| (1) as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) recommend purchase of securities to advisory <i>clients</i> for which you or any <i>related person</i> serves as underwriter, general or managing partner, or purchaser representative? | <input type="radio"/> | <input checked="" type="radio"/> |
| (3) recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)? | <input type="radio"/> | <input checked="" type="radio"/> |

Investment or Brokerage Discretion

- | | Yes | No |
|--|----------------------------------|----------------------------------|
| C. Do you or any <i>related person</i> have <i>discretionary authority</i> to determine the: | | |
| (1) securities to be bought or sold for a <i>client's</i> account? | <input checked="" type="radio"/> | <input type="radio"/> |
| (2) amount of securities to be bought or sold for a <i>client's</i> account? | <input type="radio"/> | <input checked="" type="radio"/> |
| (3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account? | <input type="radio"/> | <input checked="" type="radio"/> |
| (4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions? | <input type="radio"/> | <input checked="" type="radio"/> |
| D. If you answer "yes" to C.(3) above, are any of the brokers or dealers <i>related persons</i> ? | <input type="radio"/> | <input type="radio"/> |
| E. Do you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ? | <input checked="" type="radio"/> | <input type="radio"/> |
| F. If you answer "yes" to E above, are any of the brokers or dealers <i>related persons</i> ? | <input type="radio"/> | <input checked="" type="radio"/> |
| G. (1) Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in | <input type="radio"/> | <input checked="" type="radio"/> |

connection with *client* securities transactions?

- (2) If "yes" to G.(1) above, are all the "soft dollar benefits" you or any *related persons* receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?
- H. Do you or any *related person*, directly or indirectly, compensate any *person* for *client* referrals?
- I. Do you or any *related person*, directly or indirectly, receive compensation from any *person* for *client* referrals?

In responding to Items 8.H and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H) or received from (in answering Item 8.I) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.

Item 9 Custody

In this Item, we ask you whether you or a *related person* has *custody of client* (other than *clients* that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices.

- | | | | | |
|----|-----|--|-----------------------|----------------------------------|
| A. | (1) | Do you have <i>custody</i> of any advisory <i>clients</i> ': | Yes | No |
| | (a) | cash or bank accounts? | <input type="radio"/> | <input checked="" type="radio"/> |
| | (b) | securities? | <input type="radio"/> | <input checked="" type="radio"/> |

If you are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-(2)(d)(5)) from the related person.

- (2) If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which you have *custody*:

| | |
|--------------------|--------------------------------|
| U.S. Dollar Amount | Total Number of <i>Clients</i> |
| (a) \$ | (b) |

If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2).

- | | | | | |
|----|-----|--|-----------------------|----------------------------------|
| B. | (1) | In connection with advisory services you provide to <i>clients</i> , do any of your <i>related persons</i> have <i>custody</i> of any of your advisory <i>clients</i> ': | Yes | No |
| | (a) | cash or bank accounts? | <input type="radio"/> | <input checked="" type="radio"/> |
| | (b) | securities? | <input type="radio"/> | <input checked="" type="radio"/> |

You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b).

- (2) If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which your *related persons* have *custody*:

| | |
|--------------------|--------------------------------|
| U.S. Dollar Amount | Total Number of <i>Clients</i> |
| (a) \$ | (b) |

- C. If you or your *related persons* have *custody* of *client* funds or securities in connection with advisory services you provide to *clients*, check all the following that apply:
- (1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage.
- (2) An *independent public accountant* audits annually the pooled investment vehicle(s)

that you manage and the audited financial statements are distributed to the investors in the pools.

- (3) An *independent public accountant* conducts an annual surprise examination of *client* funds and securities.
- (4) An *independent public accountant* prepares an internal control report with respect to custodial services when you or your *related persons* are qualified custodians for *client* funds and securities.

If you checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B.(1) of Schedule D).

- D. Do you or your *related person(s)* act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*? **Yes No**
- (1) you act as a qualified custodian
- (2) your *related person(s)* act as qualified custodian(s)

If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

- E. If you are filing your *annual updating amendment* and you were subject to a surprise examination by an *independent public accountant* during your last fiscal year, provide the date (MM/YYYY) the examination commenced:
- F. If you or your *related persons* have *custody* of *client* funds or securities, how many persons, including, but not limited to, you and your *related persons*, act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?

SECTION 9.C. Independent Public Accountant

No Information Filed

Item 10 Control Persons

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you.

If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.

Yes No

- A. Does any *person* not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, *control* your management or policies?

If yes, complete Section 10.A. of Schedule D.

- B. If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

SECTION 10.A. Control Persons

No Information Filed

SECTION 10.B. Control Person Public Reporting Companies

No Information Filed

Item 11 Disclosure Information

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your *advisory affiliates*. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below.

Your *advisory affiliates* are: (1) all of your current *employees* (other than *employees* performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any *person* performing similar functions); and (3) all *persons* directly or indirectly *controlling* you or *controlled* by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your *advisory affiliates* are.

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.

You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.

| | Yes | No |
|---|-----------------------|----------------------------------|
| Do any of the events below involve you or any of your <i>supervised persons</i> ? | <input type="radio"/> | <input checked="" type="radio"/> |

For "yes" answers to the following questions, complete a Criminal Action DRP:

| | Yes | No |
|---|-----------------------|----------------------------------|
| A. In the past ten years, have you or any <i>advisory affiliate</i> : | | |
| (1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any <i>felony</i> ? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) been <i>charged</i> with any <i>felony</i> ? | <input type="radio"/> | <input checked="" type="radio"/> |

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are currently pending.

| | | |
|---|-----------------------|----------------------------------|
| B. In the past ten years, have you or any <i>advisory affiliate</i> : | | |
| (1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)? | <input type="radio"/> | <input checked="" type="radio"/> |

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser,

you may limit your response to Item 11.B.(2) to charges that are currently pending.

For "yes" answers to the following questions, complete a Regulatory Action DRP:

- | | Yes | No |
|---|-----------------------|----------------------------------|
| C. Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: | | |
| (1) <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of SEC or CFTC regulations or statutes? | <input type="radio"/> | <input checked="" type="radio"/> |
| (3) <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted? | <input type="radio"/> | <input checked="" type="radio"/> |
| (4) entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with <i>investment-related</i> activity? | <input type="radio"/> | <input checked="" type="radio"/> |
| (5) imposed a civil money penalty on you or any <i>advisory affiliate</i> , or <i>ordered</i> you or any <i>advisory affiliate</i> to cease and desist from any activity? | <input type="radio"/> | <input checked="" type="radio"/> |
| D. Has any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> : | | |
| (1) ever <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission, or been dishonest, unfair, or unethical? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) ever <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of <i>investment-related</i> regulations or statutes? | <input type="radio"/> | <input checked="" type="radio"/> |
| (3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted? | <input type="radio"/> | <input checked="" type="radio"/> |
| (4) in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity? | <input type="radio"/> | <input checked="" type="radio"/> |
| (5) ever denied, suspended, or revoked your or any <i>advisory affiliate's</i> registration or license, or otherwise prevented you or any <i>advisory affiliate</i> , by <i>order</i> , from associating with an <i>investment-related</i> business or restricted your or any <i>advisory affiliate's</i> activity? | <input type="radio"/> | <input checked="" type="radio"/> |
| E. Has any <i>self-regulatory organization</i> or commodities exchange ever: | | |
| (1) <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of its rules (other than a violation designated as a " <i>minor rule violation</i> " under a plan approved by the SEC)? | <input type="radio"/> | <input checked="" type="radio"/> |
| (3) <i>found</i> you or any <i>advisory affiliate</i> to have been the cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted? | <input type="radio"/> | <input checked="" type="radio"/> |
| (4) disciplined you or any <i>advisory affiliate</i> by expelling or suspending you or the <i>advisory affiliate</i> from membership, barring or suspending you or the <i>advisory affiliate</i> from association with other members, or otherwise restricting your or the <i>advisory affiliate's</i> activities? | <input type="radio"/> | <input checked="" type="radio"/> |
| F. Has an authorization to act as an attorney, accountant, or federal contractor granted to | | |

you or any *advisory affiliate* ever been revoked or suspended?

G. Are you or any *advisory affiliate* now the subject of any regulatory proceeding that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?

For "yes" answers to the following questions, complete a Civil Judicial Action DRP:

H. (1) Has any domestic or foreign court:

Yes No

(a) in the past ten years, enjoined you or any *advisory affiliate* in connection with any *investment-related* activity?

(b) ever *found* that you or any *advisory affiliate* were *involved* in a violation of *investment-related* statutes or regulations?

(c) ever dismissed, pursuant to a settlement agreement, an *investment-related* civil action brought against you or any *advisory affiliate* by a state or *foreign financial regulatory authority*?

(2) Are you or any *advisory affiliate* now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?

Item 12 Small Businesses

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC **and** you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- *Control* means the power to direct or cause the direction of the management or policies of a *person*, whether through ownership of securities, by contract, or otherwise. Any *person* that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another *person* is presumed to *control* the other *person*.

| | | Yes | No |
|---|-----------------------|-----------------------|-----------------------|
| A. Did you have total assets of \$5 million or more on the last day of your most recent fiscal year? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| <i>If "yes," you do not need to answer Items 12.B. and 12.C.</i> | | | |
| B. Do you: | | | |
| (1) <i>control</i> another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (2) <i>control</i> another <i>person</i> (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| C. Are you: | | | |
| (1) <i>controlled</i> by or under common <i>control</i> with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (2) <i>controlled</i> by or under common <i>control</i> with another <i>person</i> (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | MM/YYYY | | | | Birth, IRS Tax No. or Employer ID No. |
|------------------------|---|--------------------------|----------------|---|---|---|--|
| BASTIN, THOMAS, BRIAN | I | CHIEF COMPLIANCE OFFICER | 09/2005 | D | Y | N | 3261301 |
| LARSEN, BRADLEY, LEWIS | I | EXECUTIVE VICE PRESIDENT | 06/2009 | D | Y | N | 1818990 |

Schedule B**Indirect Owners**

1. Complete Schedule B only if you are submitting an initial application. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
 - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
 - (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
 - (c) in the case of an owner that is a trust, the trust and each trustee; and
 - (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are:

| | |
|---------------------------|--|
| C - 25% but less than 50% | E - 75% or more |
| D - 50% but less than 75% | F - Other (general partner, trustee, or elected manager) |
7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

No Information Filed

Schedule D - Miscellaneous

You may use the space below to explain a response to an Item or to provide any other information.

DRP Pages

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

Part 2**Exemption from brochure delivery requirements for SEC-registered advisers**

SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to *all* of your advisory clients, you do not have to prepare a brochure.

Yes No

Are you exempt from delivering a brochure to all of your clients under these rules?

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

| Brochure ID | Brochure Name | Brochure Type(s) |
|-------------|--|---|
| 94337 | ERISA FIDUCIARY ADVISORS, INC. 2013 BROCHURE PARTS 2A & 2B | Individuals, Pension plans/profit sharing plans, Pension consulting |
| 109156 | ERISA FIDUCIARY ADVISORS, INC. 2014 BROCHURE PARTS 2A & 2B | Pension plans/profit sharing plans, Pension consulting |

Execution Pages**DOMESTIC INVESTMENT ADVISER EXECUTION PAGE**

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

| | |
|---------------------|----------------------------|
| Signature: | Date: MM/DD/YYYY |
| THOMAS B BASTIN | 02/05/2014 |
| Printed Name: | Title: |
| THOMAS B BASTIN | CEO, CCO & GENERAL COUNSEL |
| Adviser CRD Number: | |
| 137879 | |

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order instituting proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

2. Appointment and Consent: Effect on Partnerships

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

3. *Non-Resident* Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:

Date: MM/DD/YYYY

Printed Name:

Title:

Adviser CRD Number:

137879

[Privacy](#) | [Legal](#) | Use of Web CRD[®], IARD[™], or PFRD[™] is governed by the [Terms & Conditions](#).

©2014 FINRA. All rights reserved. FINRA is a registered trademark of the Financial Industry Regulatory Authority, Inc.