

FORM ADV
Part II - Page 1 **Uniform Application for Investment Adviser Registration**

Name of Investment Adviser:					
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number: ()

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

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

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

Applicant:	SEC File Number: 801-	Date:
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1. A. Advisory Services and Fees. (check the applicable boxes)

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

Applicant:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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5. Education and Business Standards.

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

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

6. Education and Business Background.

For:

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

On Schedule F, give the:

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

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

A. Applicant is actively engaged in a business other than giving investment advice.

B. Applicant sells products or services other than investment advice to clients.

C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

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

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

A. Applicant is registered (or has an application pending) as a securities broker-dealer.

B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.

C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

<input type="checkbox"/> (1) broker-dealer	<input type="checkbox"/> (7) accounting firm
<input type="checkbox"/> (2) investment company	<input type="checkbox"/> (8) law firm
<input type="checkbox"/> (3) other investment adviser	<input type="checkbox"/> (9) insurance company or agency
<input type="checkbox"/> (4) financial planning firm	<input type="checkbox"/> (10) pension consultant
<input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant	<input type="checkbox"/> (11) real estate broker or dealer
<input type="checkbox"/> (6) banking or thrift institution	<input type="checkbox"/> (12) entity that creates or packages limited partnerships

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

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

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

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9. Participation or Interest in Client Transactions.

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

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

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

10. Conditions for Managing Accounts. Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services and impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes No

(If yes, describe on Schedule F.)

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

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

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

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12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold?	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
(2) amount of the securities to be bought or sold?	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
(3) broker or dealer to be used?	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
(4) commission rates paid?	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>

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

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

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

13. Additional Compensation.

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

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? Yes No

B. directly or indirectly compensates any person for client referrals? Yes No

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

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

- has custody of client funds or securities; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Yes No

Has applicant provided a Schedule G balance sheet?

**Schedule G of
Form ADV
Balance Sheet**

Applicant:	SEC File Number: 801-	Date:
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(Answers in Response to Form ADV Part II Item 14.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:	IRSEmpl. Ident. No.:
Instructions	
1. The balance sheet must be: A. Prepared in accordance with generally accepted accounting principles B. Audited by an independent public accountant C. Accompanied by a note stating the principles used to prepare it, the basis of included securities, and any other explanations required for clarity.	
2. Securities included at cost should show their market or fair value parenthetically.	
3. Qualifications and any accompanying independent accountant's report must conform to Article 2 of Regulation S-X (17 CFR 210.2-01 et. seq.).	
4. Sole proprietor investment advisers: A. Must show investment advisory business assets and liabilities separate from other business and personal assets and liabilities B. May aggregate other business and personal assets and liabilities unless there is an asset deficiency in the total financial position.	

Balance Sheet for Ram Yariv as of 11/05
(Includes unrealized gains)
As of 11/7/2005

11/7/2005

Page 1

Account	11/7/2005 Balance
ASSETS	
Cash and Bank Accounts	
Checking	2,640.71
Checking at Fleet Homelink	50.00
prefered money mkt	0.00
Cash Account	0.00
TOTAL Cash and Bank Acco...	2,690.71
Other Assets	
77 west 55th Street # 17J	700,000.00
77west 55 17k	475,000.00
TOTAL Other Assets	1,175,000.00
Investments	
IRA	0.00
IRA 2	0.00
TOTAL Investments	0.00
TOTAL ASSETS	1,177,690.71
LIABILITIES	
Credit Cards	
5297 CREDIT CARD	10,130.83
CC 7740 chase	13,120.30
Citi CC 6535	22,539.44
Credit Card 2 at JPMorga...	10,542.38
Credit Card at JPMorgan ...	0.00
HE1 9657	95,010.18
Line of Credit 2 at Citi...	1,508.79
MBNA CC 6185	10,526.49
Ready Credit1	5,733.00
TOTAL Credit Cards	169,111.41
Other Liabilities	
77west 55st Loan 17J	225,790.67
77west 55st loan17K	142,414.00
TOTAL Other Liabilities	368,204.67
TOTAL LIABILITIES	537,316.08
OVERALL TOTAL	640,374.63

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(for sponsors of wrap fee programs)

Name of wrap fee program or programs described in attached brochure:

- 1. Applicability of Schedule.** This Schedule must be completed by applicants that are compensated under a wrap fee program for sponsoring, organizing, or administering the program, or for selecting, or providing advice to clients regarding the selection of, other investment advisers in the program (“sponsors”). A wrap fee program is any program under which a specified fee or fees not based directly upon transactions in a client’s account is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and execution of client transactions.
- 2. Use of Schedule.** This Schedule sets forth the information the sponsor must include in the wrap fee brochure it is required to deliver or offer to deliver to clients and prospective clients of its wrap fee programs under Rule 204-3 under the federal Advisers Act and similar rules of the jurisdictions. The wrap fee brochure prepared in response to this Schedule must be filed with the Commission and the jurisdictions as part of Form ADV by completing the identifying information on this Schedule and attaching the brochure. Brochures should be prepared separately, not on copies of this Schedule. Any wrap fee brochure filed with the Commission as part of an amendment to Form ADV shall contain in the upper right hand corner of the cover page the sponsor’s registration number (801-).
- 3. General Contents of Brochure.** Unlike Parts I and II of this form, this Schedule is not organized in “check-the-box” format. These instructions, including the requests for information in Item 7 below, should not be repeated in the brochure. Rather, this Schedule describes minimum disclosures that must be made in the brochure to satisfy the sponsor’s duty to disclose all material facts about the sponsor and its wrap fee programs. **Nothing in this Schedule relieves the sponsor from any obligation under any provision of the federal Advisers Act or rules thereunder, or other federal or state law to disclose information to its advisory clients or prospective advisory clients not specifically required by this Schedule.**
- 4. Multiple Sponsors.** If two or more persons fall within the definition of “sponsor” in Item 1 above for a single wrap fee program, only one such sponsor need complete the Schedule. The sponsors may choose among themselves the sponsor that will complete the Schedule.
- 5. Omission of Inapplicable Information.** Any information not specifically required by this Schedule that is included in the brochure should be applicable to clients and prospective clients of the sponsor’s wrap fee programs. If the sponsor is required to complete this Schedule with respect to more than one wrap fee program, the sponsor may omit from the brochure furnished to clients and prospective clients of any wrap fee program or programs information required by this Schedule that is not applicable to clients or prospective clients of that wrap fee program or programs. If a sponsor of more than one wrap fee program prepares separate wrap fee brochures for clients of different programs, each brochure prepared must be filed with the Commission and the jurisdictions attached to a separate copy of this Schedule. Each such brochure must state that the sponsor sponsors other wrap fee programs and state how brochures for those programs may be obtained.
- 6. Updating.** Sponsors are required to file an amendment to the brochure promptly after any information in the brochure becomes materially inaccurate. Amendments may be made by use of a “sticker,” *i.e.*, a supplement affixed to the brochure that indicates what information is being added or updated and states the new or revised information, as long as the resulting brochure is readable. Stickers should be dated and should be incorporated into the text of the brochure when the brochure itself is revised.
- 7. Contents of Brochure.** Include in the brochure prepared in response to this Schedule:
 - on the cover page, the sponsor’s name, address, telephone number, and the following legend in bold type or some other prominent fashion:
This brochure provides clients with information about [name of sponsor] and the [name of program or programs] that should be considered before becoming a client of the [name of program or programs]. This information has not been approved or verified by any governmental authority.
 - a table of contents reflecting the subject headings in the sponsor’s brochure;
 - the amount of the wrap fee charged for each program or, if fees vary according to a schedule established by the sponsor, a table setting forth the fee schedule, whether such fees are negotiable, the portion of the total fee (or the range of such amounts) paid to persons providing advice to clients regarding the purchase or sale of specific securities under the program (“portfolio managers”), and the services provided under each program (including the types of portfolio management services);

Applicant:	SEC File Number: 801-	DATE: MM/DD/YY
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- (d) a statement that the program may cost the client more or less than purchasing such services separately and a statement of the factors that bear upon the relative cost of the program (*e.g.*, the cost of the services if provided separately and the trading activity in the client's account);
- (e) if applicable, a statement that the person recommending the program to the client receives compensation as a result of the client's participation in the program, that the amount of this compensation may be more than what the person would receive if the client participated in other programs of the sponsor or paid separately for investment advice, brokerage, and other services, and that the person may therefore have a financial incentive to recommend the wrap fee program over other programs or services;
- (f) a description of the nature of any fees that the client may pay in addition to the wrap fee and the circumstances under which these fees may be paid (including, if applicable, mutual fund expenses and mark-ups, mark-downs or spreads paid to market makers from whom securities were obtained by the wrap fee broker);
- (g) how the program's portfolio managers are selected and reviewed, the basis upon which portfolio managers are recommended or chosen for particular clients, and the circumstances under which the sponsor will replace or recommend the replacement of the portfolio manager;
- (h) (1) if applicable, a statement to the effect that portfolio manager performance information is not reviewed by the sponsor or a third party and/or that performance information is not calculated on a uniform and consistent basis,
 (2) if performance information is reviewed to determine its accuracy, the name of the party who reviews the information and a brief description of the nature of the review,
 (3) a reference to any standards (*i.e.*, industry standards or standards used solely by the sponsor) under which performance information may be calculated;
- (i) a description of the information about the client that is communicated by the sponsor to the client's portfolio manager, and how often or under what circumstances the sponsor provides updated information about the client to the portfolio manager;
- (j) any restrictions on the ability of clients to contact and consult with portfolio managers;
- (k) in narrative text, the information required by Items 7 and 8 of Part II of this form and, as applicable to clients of the wrap fee program, the information required by Items 2, 5, 6, 9A and C, 10, 11, 13 and 14 of Part II;
- (l) if any practice or relationship disclosed in response to Item 7, 8, 9A, 9C and 13 of Part II presents a conflict between the interests of the sponsor and those of its clients, explain the nature of any such conflict of interest; and
- (m) if the sponsor or its divisions or employees covered under the same investment adviser registration as the sponsor act as portfolio managers for a wrap fee program described in the brochure, a brief, general description of the investments and investment strategies utilized by those portfolio managers.

8. Organization and Cross References. Except for the cover page requirements in Item 7(a) above, information contained in the brochure need not follow the order of the items listed in Item 7. However, the brochure should not be organized in such a manner that important information called for by the form is obscured.

Set forth below the page(s) of the brochure on which the various disclosures required by Item 7 are provided.

	<i>Page(s)</i>		<i>Page(s)</i>		<i>Page(s)</i>
Item 7(a)	cover	Item 7(f)		Item 7(j)	
#7(b)		#7(g)		#7(k)	
#7(c)		#7(h)		#7(l)	
#7(d)		#7(i)		#7(m)	
#7(e)					

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Ram Yariv	IRS Empl. Ident. No.:										
<p>Item of Form (identify)</p> <p>Item 1D</p>	<p style="text-align: center;">Answer</p> <p>As discussed below in this disclosure statement, the Registrant provides its clients with comprehensive financial planning and discretionary and non-discretionary investment management services.</p> <p>Financial Planning</p> <p>Registrant may provide its clients with a broad range of financial planning and consulting services (including non-investment related matters), which may address, among other issues, estate and retirement planning, taxes, college planning, long term care issues and/or investment recommendations.</p> <p>Registrant will charge a fee (fixed and/or hourly) for these services. Registrant's financial planning fees are negotiable, but generally begin at a minimum of \$2,500 on a fixed fee basis and from \$100 to \$195 on an hourly rate basis, depending upon the level and scope of the services required and the professional, para-professional and/or administrative personnel rendering service(s).</p> <p>Prior to engaging the Registrant to provide financial planning and/or consulting, the client will be required to enter into a Financial Planning Agreement with Registrant defining the terms and conditions of the engagement, describing the scope of the services to be provided and the portion of the fee that is due from the client prior to Registrant commencing services. In the event the client terminates Registrant's financial planning and/or consulting services, any unearned fee shall be refunded to the client.</p> <p>In performing its services, Registrant is required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. If requested by the client, Registrant may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute control over all such implementation decisions and is free to accept or reject any recommendation by Registrant.</p> <p>Investment Management</p> <p>In the event the client desires, the client can engage the Registrant to design an investment portfolio and provide ongoing and continuous corresponding investment management services on a fee-only basis. In the event the client determines to implement investment recommendations through the Registrant on a fee-only basis, Registrant shall charge an annual investment management fee based upon a percentage of the market value of the assets being managed by the Registrant.</p> <p>The investment management percentage fee charged shall vary (between 0.50% and 1.25%) depending upon the market value of the assets under management, as follows:</p> <table border="0"> <tr> <td colspan="2">Assets under Management Annual % Fee:</td> </tr> <tr> <td>Up to \$500K</td> <td>1.25%</td> </tr> <tr> <td>\$500K- \$1M</td> <td>1.0%</td> </tr> <tr> <td>\$1M - \$3M</td> <td>0.75%</td> </tr> <tr> <td>Above \$3M</td> <td>0.50%</td> </tr> </table> <p>Registrant generally requires an account minimum of \$100,000.00 for asset management services.</p> <p>Registrant's annual investment management fee shall be prorated and paid daily or quarterly, in arrears, based upon the client's net worth or assets under management on the</p>	Assets under Management Annual % Fee:		Up to \$500K	1.25%	\$500K- \$1M	1.0%	\$1M - \$3M	0.75%	Above \$3M	0.50%
Assets under Management Annual % Fee:											
Up to \$500K	1.25%										
\$500K- \$1M	1.0%										
\$1M - \$3M	0.75%										
Above \$3M	0.50%										

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

Applicant:
Zik LLC

SEC File Number:
 801-

Date:
03/01/2006

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Ram Yariv		IRS Empl. Ident. No.:
<p>Item of Form (identify)</p> <p>Continued Item 1D</p>	<p style="text-align: center;">Answer</p> <p>previous day, or the last day of the previous quarter. (Registrant will utilize Interactive Brokers IB Automated bill system)</p> <p>However, Registrant, in its sole discretion, may require a lesser account minimum or charge a lesser investment management fee based upon certain criteria (i.e. existing financial planning client, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).</p> <p>Prior to engaging Registrant to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with Registrant setting forth the terms and conditions under which Registrant shall manage the client's assets, and a separate custodial/clearing agreement with the designated broker-dealer/custodian. Both Registrant's Investment Advisory Agreement and the broker-dealer/custodian's custodial/clearing agreement may authorize the broker-dealer/custodian to debit the account for the amount of the Registrant's investment management fee and to directly remit that management fee to the Registrant in accordance with applicable regulatory procedures. The Investment Advisory Agreement between the Registrant and the client will continue in effect until terminated by either party by written notice. Registrant's investment management fee shall be prorated through the date of termination, and any remaining balance shall be promptly refunded to the client. The broker-dealer/custodian charges brokerage commissions and/or transaction fees for effecting certain securities transactions.</p> <p>Factors which the Registrant considers in recommending a broker-dealer/custodian to clients include the broker-dealer's/custodian's financial strength, reputation, execution, pricing, reporting, research, service, and state registration(s). The broker-dealer/custodian charges commission rates which are generally considered discounted from customary retail commission rates. The commissions and/or transaction fees charged by the broker-dealer/custodian may be higher or lower than those charged by other broker-dealers. The Registrant will not receive any portion of the brokerage commissions and/or transactions fees charged to fee-only clients. In return for effecting securities transactions through the broker-dealer/custodian or other designated broker-dealer/custodian, Registrant may receive certain investment research products and/or services which assist the Registrant in its investment decision-making process for the client, all of which transactions shall be in compliance with Section 28(e) of the Securities Exchange Act of 1934. The brokerage commissions and/or transaction fees charged by the broker-dealer/custodian or other designated broker-dealer/custodian are exclusive of, and in addition to, Registrant's investment management fee. Although the commissions paid by Registrant's clients shall comply with the Registrant's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the Registrant determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of broker-dealer services, including the value of research provided, execution capability, commission rates, and responsiveness.</p> <p>Accordingly, although Registrant will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. Although the investment research products and/or services that may be obtained by Registrant will</p>	

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

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Ram Yariv	IRS Empl. Ident. No.:
Item of Form (identify)	Answer
Item 6	<p>Ram Yariv Born 1957</p> <p>Education Background MBA, New York Institute of Technology, (Finance, International Marketing), 1988 B Sc, Tel Aviv University (Statistics, Economics), 1981-1984</p> <p>Business Background</p> <p>12/1996-09/2005 Monarch Financial Corp of America Senior Investment Advisor</p> <p>12/1990-12/1996 Ladenburg Thalman V.P Wealth Management</p> <p>1988 -12/1990 Rosenkrantz Lyon & Ross Stockbroker</p>
Item 7B	<p>Registrant is affiliated with a New York Real Estate brokerage firm, and spends 2 hours per week on real estate activities.</p>
Item 8B	<p>As discussed above in Item 1D (above), unless the client directs otherwise, Registrant shall generally recommend that Interactive Brokers LLC serve as the broker-dealer/custodian for Fee-only client accounts. Interactive Brokers LLC is not a related person of Registrant</p> <p>Registrant is an associate p/t salesperson with Valeo Realty Sales Group.</p>
Item 9E	<p>Investment Policy None of Registrant's advisory representatives may effect for himself or herself or for his or her immediate family (i.e. spouse, minor children) (collectively "Covered Persons") any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of Registrant's clients, unless in accordance with the following firm Procedures.</p> <p>Firm Procedures –</p> <p>In order to implement Registrant's investment policy, the following procedures have been put into place with respect to Registrant and its Covered Persons:</p> <p>(1) If Registrant is purchasing or considering for purchase any security on behalf of Registrant's client, no Covered Persons may transact in that security prior to the client purchase having been completed by Registrant or until a decision has been made not to purchase the security on behalf of the client, and</p> <p>(2) If Registrant is selling or considering the sale of any security on behalf of Registrant's client, no Covered Persons may transact in that security prior to the sale on behalf of the client having been completed by Registrant or until a decision has been made not to sell the security on behalf of the client.</p>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

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Item of Form (identify)	Answer
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<p>Item 9E(Continued)</p>	<p>Exceptions</p> <p>This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of Registrant's clients trade in sufficiently broad markets to permit transactions to be completed without any appreciable impact on the markets of the securities. Under certain circumstances exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions will be maintained with Registrant's records.</p> <p>In accordance with Section 204A of the Investment Advisers Act of 1940, Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Registrant or any person associated with Registrant.</p>
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<p>Item 10</p>	<p>Please see the previous responses set forth on this Schedule "F" to Item 1D</p> <p>Registrant generally requires an account minimum of \$100,000.00 for asset management services.</p> <p>Registrant's annual investment management fee shall be prorated and paid daily or quarterly, in arrears, based upon the client's net worth or assets under management on the previous day, or the last day of the previous quarter.(Registrant will utilize Interactive Brokerage Automated bill system). However, Registrant, in its sole discretion, may require a lesser account minimum or charge a lesser investment management fee based upon certain criteria (i.e. existing financial planning client, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).</p>
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<p>ITEM 12A& 12B</p>	<p>Please see the previous responses set forth on this Schedule "F" to Item 1D.</p> <p>In addition, Registrant's general policies relative to the execution of client securities brokerage transactions are as follows:</p> <p>Registrant maintains a fully independent investment management business. Registrant does not rely on brokers or dealers for products or research, nor does he engage in additional compensation arrangements or referral fees with third parties.</p> <p>In providing investment management services, Registrant does not take possession of client securities or funds. However, Registrant requests limited power of attorney to direct securities transactions on behalf of clients.</p>
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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Ram Yariv	IRS Empl. Ident. No.:
Item of Form (identify) ITEM 12A & 12B (Continued)	Answer <p>In determining which broker dealer to use for custody of client accounts and to make security transactions, all of Registrant investment management client assets are currently held in accounts at Interactive Brokers LLC. (IB), and most transactions are made in those accounts. Clients and Registrant each receive duplicate copies of daily and monthly brokerage account statements and confirmations of all securities transactions via email.</p> <p>Registrant receives no compensation from IB (or any other third party) for services rendered. Registrant's electronic linkages with IB enables Registrant to make timely and accurate securities transactions, monitor transactions and other activity in client portfolios, and maintain daily price files and portfolio records. IB also enables clients to consolidate diverse investments in single accounts.</p> <p>All discounts on commissions on accounts at IB are passed through to the benefit of clients.</p> <p>Registrant continuously works with IB to minimize client expenses. Registrant also investigates other firms to evaluate services and costs. To date Registrant has not found any alternative broker-dealer that offers the same level of services as IB at competitive prices to those of IB.</p> <p>In making securities transactions for clients, Registrant may make trades individually in separate accounts, or in aggregate transactions to be allocated to individual client portfolios. In all instances, Registrant seeks to treat all clients fairly and act in their best interests.</p> <p>PRIVACY POLICY All information provided by clients is treated as confidential and shall not be disclosed to third parties except as required by law or as necessary to affect, administer or process a transaction authorized by the client. Exceptions shall include only disclosures made at the direction or with the consent of the client, to protect against fraud, or to respond to judicial process.</p> <p>PROXY VOTING In providing investment management service to clients, Registrant's policy with regard to proxy voting is to vote proxies on behalf of clients. Registrant reviews all proxy materials upon receipt and votes them using Registrant best judgment, based on what Registrant believes to be in the best interests of clients. If, however, clients wish to vote proxies for them, they may elect to do so. Clients of Registrant may contact us at any time if they wish to discuss any matters with regard to proxy voting.</p>