

FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

OMB APPROVAL	
OMB Number:	3235-0049
Expires:	February 28, 2011
Estimated average burden	
Hours per response...	.4.07

Name of Investment Adviser: Aspire Capital Management				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
1535 N. Main St., Suite 210	Walnut Creek	CA	94596	(925) 938-2023

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.

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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 checked="" type="checkbox"/> (1) Provides investment supervisory services	<u>80%</u>
<input type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services	<u> %</u>
<input checked="" type="checkbox"/> (3) Furnishes investment advice through consultations not included in either service described above	<u>20%</u>
<input type="checkbox"/> (4) Issues periodicals about securities by subscription	<u> %</u>
<input type="checkbox"/> (5) Issues special reports about securities not included in any service described above	<u> %</u>
<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	<u> %</u>
<input type="checkbox"/> (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	<u> %</u>
<input type="checkbox"/> (8) Provides a timing service	<u> %</u>
<input type="checkbox"/> (9) Furnishes advice about securities in any manner not described above	<u> %</u>

(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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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C. Applicant offers investment advisory services for: (check all that apply)

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

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

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

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

<input checked="" type="checkbox"/> A. Individuals	<input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations
<input type="checkbox"/> B. Banks or thrift institutions	<input 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)

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

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

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

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

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

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

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

- | | |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" 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 | |

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

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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
- year of birth
- formal education after high school
- 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.)

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

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

(If yes, describe on Schedule F.)

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

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

See Schedule F attached.

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

See Schedule F attached.

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

- B. Does applicant or a related person suggest brokers to clients?
- | | | |
|--|---|-----------------------------|
| | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
|--|---|-----------------------------|

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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
|--|---|-----------------------------|
- B. directly or indirectly compensates any person for client referrals?
- | | | |
|--|------------------------------|--|
| | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
|--|------------------------------|--|

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

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

- has custody of client funds or securities unless applicant is registered or registering only with the Securities and Exchange Commission; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?

	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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Item of Form (identify)	Answer														
1. C.	<p>compensation from any such referrals.</p> <p>In addition to providing formal Investment Management and Financial Planning, Aspire provides ongoing financial advice on a range of related issues. Such advice is based on discussions initiated by the Clients. Examples include advice about mortgage refinancing, debt management, college savings plans, retirement plans, tax planning, and estate planning issues.</p> <p>FEES</p> <p>Client and Aspire will execute an Investment Advisory Services Agreement, which shall govern the fees paid to Aspire and other terms of the relationship.</p> <p>Fees paid to Aspire by the Client for the investment management services described above are charged, according to the schedule below:</p> <table border="1" data-bbox="456 877 1523 1220"> <thead> <tr> <th>Assets under Management</th> <th>Annual Fee</th> </tr> </thead> <tbody> <tr> <td>\$0 to \$500,000</td> <td>0.80 %</td> </tr> <tr> <td>\$500,001 to \$2,000,000</td> <td>0.60%</td> </tr> <tr> <td>Over \$2,000,001</td> <td>0.40%</td> </tr> <tr> <th>Optional Fee Arrangement</th> <th>Monthly Fee</th> </tr> <tr> <td>Fixed Retainer for accounts under \$1,000,000</td> <td>\$290.00</td> </tr> <tr> <td>Fixed Retainer for accounts over \$1,000,000</td> <td>\$590.00</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • The above fees may be negotiable if there are special portfolio considerations, such as agreements not to trade or constraints on trading applied to parts of the portfolio. • Fees for investment management are charged quarterly, in advance, at a rate of one quarter of the annual fee, with the amount based on the market value of assets under management (AUM) on the last day of the previous quarter. For purposes of calculating the fee, related accounts, subject to certain conditions, are combined. • Clients will provide a written authorization permitting the management fee to be deducted from their account by the custodian and paid to Aspire. At the time Aspire directs the custodian to deduct the fee, Aspire will provide an invoice to the Client showing the amount of the fee and the calculation method. In addition, the custodian will send the Client a monthly account statement showing any fee amounts deducted during the month. • All fees paid to Aspire for the investment management services described 	Assets under Management	Annual Fee	\$0 to \$500,000	0.80 %	\$500,001 to \$2,000,000	0.60%	Over \$2,000,001	0.40%	Optional Fee Arrangement	Monthly Fee	Fixed Retainer for accounts under \$1,000,000	\$290.00	Fixed Retainer for accounts over \$1,000,000	\$590.00
Assets under Management	Annual Fee														
\$0 to \$500,000	0.80 %														
\$500,001 to \$2,000,000	0.60%														
Over \$2,000,001	0.40%														
Optional Fee Arrangement	Monthly Fee														
Fixed Retainer for accounts under \$1,000,000	\$290.00														
Fixed Retainer for accounts over \$1,000,000	\$590.00														

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

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Item of Form (identify)	Answer
	<p>above are separate and distinct from any fees and expenses charged by any mutual funds or exchange-traded funds to their shareholders. These fees and expenses are described in each fund’s prospectus. Similarly, any commissions or other fees charged to the Client by the custodians are separate and distinct from the above-described fees paid to Aspire. Aspire does not share in any of these fees, expenses or commissions charged the Client accounts by any mutual funds or Custodians, or any other third parties.</p> <ul style="list-style-type: none"> • The investment management fees charged to the Client by Aspire are based on the calculations documented in the table above, and are not charged on the basis of a share of capital gains or capital appreciation of the funds or any portion of the funds of an advisory Client (SEC Rule 205(a)(1)). • Each security in a portfolio that is listed on a national securities exchange will be valued at the last quoted sales price on the valuation date on the principal exchange where the security is traded. Any other security or asset in a managed investment portfolio will be valued in a manner determined in good faith by Aspire to reflect its fair market value on the valuation date. <p>Financial planning fees and fees for special investment or financial research projects generally range from \$2,500 to \$3,500, depending upon the level and scopes of the professional, planning and/or consulting services required, and are charged at the rate \$250.00 per hour, subject to a minimum of \$2,000.00.</p> <p>Prior to engaging Aspire to provide financial planning and/or consulting services, the client will generally be required to enter into a Financial Planning Agreement or Consulting Agreement with Aspire setting forth the terms and conditions of the engagement, and describing the scope of the services to be provided, and the portion of the fee that is due from the Client prior to Aspire commencing services.</p> <p>The Client retains absolute discretion over all implementation decisions related to financial planning and/or consulting services and is free to accept or reject any recommendation from Aspire. Moreover, each Client is advised that it remains their responsibility to promptly notify Aspire if there is ever any change in their financial situation or investment objectives that might cause a change in the establish Investment Policy and in Aspire’s previous recommendations.</p> <p>Either party can terminate the Investment Advisory Services Agreement, Consulting Agreement, or Financial Planning Agreement at any time by providing 5 days written notice to the other party, which shall be effective upon receipt by the other party. Aspire’s investment management fee shall be prorated through the date of termination, and any remaining balance shall be promptly refunded to the</p>

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

Item of Form (identify)	Answer
6.	<p>client. Any un-earned financial planning or consulting fees will be promptly returned to the Client.</p>
	<p>EDUCATION AND BUSINESS BACKGROUND</p> <p>Evor C. Vattuone, born 1972 Education: San Jose State University, 1995, BS Aviation & BS Business Certified Financial Planner, 2008 Employment: Financial Advisor, Aspire Capital Management, February 2008 to Present Independent HR Consulting, February 2006 to December 2007 Human Resources Manager, Intervoice, April 2000 to February 2006 Financial Advisor, American Express Financial Advisors, January 1999 to February 2000 Financial Advisor, VM Investments, June 1995 to January 1999</p>
7. A. B.	<p>OTHER BUSINESS ACTIVITIES</p> <p>Evor Vattuone is a licensed as an insurance agent to sell insurance in his capacity as an agent. Clients may elect to implement insurance recommendations through Vattuone. If this occurs, Vattuone will receive separate but customary commission compensation for effecting insurance and annuity transactions on behalf of the same clients</p>
9. E	<p>PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS</p> <p>Aspire may buy and sell the same securities that may be recommended to clients. If the possibility of a conflict or interest occurs, the client's interest will prevail.</p> <p>As this situation may represent a conflict of interest, Aspire has established the following restrictions in order to ensure its fiduciary responsibilities:</p> <ol style="list-style-type: none"> 1) A principal, director, officer or employee of Aspire shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment at Aspire unless the information is also available to the investing public on reasonable inquiry. No such person or Aspire shall prefer his or her own interest to that of the advisory Client. 2) Aspire maintains a list of all securities holdings for itself, and anyone associated with this advisory practice. The Chief Compliance Officer reviews these holdings on a regular basis. 3) Aspire requires that all individuals must act in accordance with all applicable

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

Item of Form (identify)	Answer
<p>11. A.</p> <p>11. B.</p> <p>12. A.</p> <p>12. B.</p>	<p>Federal and State regulations governing registered investment advisory practices. 4) Any individual not in observance of the above may be subject to termination.</p> <p>REPORTS</p> <p>Client's investments are reviewed at the inception of the client relationship, and thereafter as often as is mutually agreed between Aspire and the Client based on the Client's stated objectives.</p> <p>Generally all investment reports are provided to clients at inception of the relationship and during each review cycle with the client, as mutually agreed. The custodian of the assets also provides reports to clients.</p> <p>INVESTMENT OR BROKERAGE DISCRETION</p> <p>Aspire provides investment advice on either a discretionary or non-discretionary basis concerning the amount of securities to be bought and sold. Non-discretionary client retains final authority on accepting any recommendations made by Aspire..</p> <p>There may be conflicts of interest over time devoted to advising any one account .. Aspire will attempt to resolve all such conflicts in a manner that is generally fair to all clients.</p> <p>RECOMMENDING BROKERS/CUSTODIANS</p> <p>Aspire recommends that its clients use Shareholders Service Group, Inc. ("SSG") as its broker. The services provided by SSG are a factor in the firm's suggestion that clients use SSG, whose services will ordinarily include monthly or at least quarterly account statements to clients.</p> <p>Aspire may recommend that clients establish brokerage accounts with Shareholders Service Group, Inc. (SSG), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Aspire is independently owned and operated and not affiliated with SSG. SSG provides Aspire with access to its institutional trading and custody services, which are typically not available to retail investors.</p> <p>For Aspire's client accounts maintained in its custody, SSG generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through SSG or that settle into SSG accounts.</p> <p>SSG also makes available to Aspire other products and services that benefit Aspire</p>

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

Item of Form (identify)	Answer
13. A.	<p>but may not benefit its clients' accounts. Some of these other products and services assist Aspire in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of Aspire's fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting. SSG also makes available to Aspire other services intended to help Aspire manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. While as a fiduciary, Aspire endeavors to act in its clients' best interests, and Aspire's recommendation that clients maintain their assets in accounts at SSG may be based in part on the benefit to Aspire of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by SSG, which may create a potential conflict of interest.</p> <p>ADDITIONAL COMPENSATION</p> <p>Evor Vattuone is a licensed as an insurance agent to sell insurance in his capacity as an agent. Clients may elect to implement insurance recommendations through Vattuone. If this occurs, Vattuone will receive separate but customary commission compensation for effecting insurance and annuity transactions on behalf of the same clients</p> <p>Aspire participates in SSG's institutional program. As part of this program, Aspire receives benefits that it would not receive if it did not provide investment advice to clients. While there is no direct affiliation or fee sharing arrangement between SSG and Aspire for participation in the institutional program, economic benefits are received by Aspire that would not be received if Aspire did not have an established relationship with SSG. These benefits do not depend on the amount of transactions directed by Aspire to SSG. These benefits may include: a dedicated trading desk that services our Clients, a dedicated service group and an account services manager dedicated to our account, access to a real time order matching system, ability to do block Client trades, electronic download of trades, duplicate and batched Client statements, confirmations and year-end summaries, the ability to have advisory fees directly debited from Client accounts (in accordance with federal and state requirements), a quarterly newsletter, and the ability to have custody fees waived.</p> <p>ADDITIONAL DISCLOSURES</p>

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

Item of Form (identify)	Answer
Code of Ethics	<p>Aspire maintains a code of ethics that requires that all personnel act with integrity, competence, dignity and in an ethical manner when dealing with the public, clients, prospective clients, employers and employees. The code of ethics places upon Aspire the duty to exercise its authority and responsibility for the benefit of its clients, to place the interests of its clients first and to refrain from having outside interests that conflict with the interests of its clients. Aspire will not disclose any nonpublic personal information about a client to any nonaffiliated third party without the client's express permission to do so. Aspire is also obligated under its code of ethics to maintain the security of client information, including information stored on computers. The code of ethics provides specific guidance in the areas of disclosure of conflicts of interest, acceptance of gifts, personal securities transactions, prohibited transactions, nonpayment of referral fees, prohibition on insider trading and others. All personnel of Aspire are covered by the code of ethics and failure to comply may result in disciplinary action, including termination. Aspire will provide a copy of its complete code of ethics to any client or prospective client upon request.</p>
Proxy Voting	<p>Aspire does not vote Client proxies. Therefore, although Aspire may provide investment advisory services relative to Client investment assets, Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Aspire and/or the Client shall correspondingly instruct each custodian of the assets to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets.</p>
California Code	<p>The California Code of Regulations imposes two notice requirements upon financial advisers: (a.) lower cost comparable services may be available from others, and (b.) the possibility exists for a conflict of interest between Client interests and those of Aspire. Clients are under no obligation to purchase advice or services from Aspire.</p>
Privacy	<p>Aspire is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. Categories of nonpublic information that Aspire collects from Clients will include information about personal finances. If authorized to do so, Aspire will provide specific information to attorneys, accountants, and mortgage lenders with whom Clients have established a relationship. With authorization, Aspire also shares a limited amount of information about you with SSG in order to execute securities transactions on your behalf.</p> <p>Aspire maintains a secure office to ensure that your information is not placed at</p>

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

