

# Form ADV: Part II

Uniform Application for Investment Advisor Registration

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This part of Form ADV gives information about the Investment Advisor and its business. The information has not been approved or verified by any government authority.

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**FORM ADV**  
**Uniform Application for Investment Adviser Registration**

**Part II - Page 1**

Name of Investment Adviser: <b>Course Pilot Financial LLC</b>				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone number:
<b>7 Eagle Rock Terrace</b>	<b>South Grafton</b>	<b>MA</b>	<b>01560</b>	<b>(617) 314-7378</b>

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

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

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

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

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

Applicant:

<input checked="" type="checkbox"/>	(1) Provides investment supervisory services . . . . .	40 %
<input checked="" type="checkbox"/>	(2) Manages investment advisory accounts not involving investment supervisory services . . . . .	30 %
<input checked="" type="checkbox"/>	(3) Furnishes investment advice through consultations not included in either service described above . . . . .	10 %
<input type="checkbox"/>	(4) Issues periodicals about securities by subscription . . . . .	%
<input type="checkbox"/>	(5) Issues special reports about securities not included in any service described above . . . . .	%
<input type="checkbox"/>	(6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . .	%
<input checked="" type="checkbox"/>	(7) On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .	20 %
<input type="checkbox"/>	(8) Provides a timing service . . . . .	%
<input type="checkbox"/>	(9) Furnishes advice about securities in any manner not described above . . . . .	%

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**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.

**See Schedule F for a complete description.**

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

**See Schedule F for a complete description.**

**12. Investment or Brokerage Discretion.**

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

- |  |                                     |                          |
|--|-------------------------------------|--------------------------|
|  | Yes                                 | No                       |
| (1) securities to be bought or sold? .....               | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? ..... | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? .....                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? .....                         | <input checked="" 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 product and research services received.

**13. Additional Compensation.**

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

- |   |   |  |
|---|---|--|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes <input checked="" type="checkbox"/> | No <input 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; or
  - Requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? ..... Yes  No

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

Applicant:  
**Course Pilot Financial, LLC**

SEC File Number:

Date:  
**04/03/2006**

(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:	IRS Empl. Ident. No.:
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<p><b>1A(1)</b></p> <p><b>1A(2)</b></p> <p><b>1A(3)</b></p>	<p><u>Advisory Services:</u> Course Pilot Financial LLC (“FIRM”) principal service is providing fee-based investment advisory services and financial planning services. The advisor practices custom management of portfolios, on a discretionary basis, according to the client’s objectives. The advisor’s primary approach is to use a fundamental allocation strategy aimed at reducing risk and increasing performance. The advisor uses exchange listed securities, corporate debt securities, CDs, variable life insurance, variable annuities, municipal securities, mutual funds, United States government securities, and options in securities and interests in partnerships investing in real estate to accomplish this objective. The advisor measures and selects mutual funds by using various criteria, such as the fund manager’s tenure, and/or overall career performance. The advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, 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.</p> <p>The FIRM will provide investment advisory services and portfolio management services and will not provide securities execution, custodial and other administrative services. At no time will the FIRM accept or maintain custody of a client’s funds or securities.</p> <p><u>Selection of Other Advisors:</u> Course Pilot Financial LLC (“FIRM”) may periodically recommend and refer clients to unaffiliated money managers or investment advisors at Firm or client’s request. Through this arrangement, the Client will then enter into an advisory agreement with that sub-advisor to which that sub-advisor will assist and advise the client in establishing investment objectives and develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such sub-advisor services, said sub advisor will receive an Investment Advisory Fee, billed quarterly in arrears; based on the account asset value at the time the account is established. The FIRM will receive a portion of the Investment Advisory Fee for the solicitation and referral of the client to the sub-advisor, for assisting the client in completing their client questionnaire and account opening paperwork, and for assisting in the development of the initial policy recommendations and managing the ongoing client relationship.</p> <p>The Client, prior to entering into an agreement with a sub-advisor selected by the FIRM, will be provided with that sub-advisors Form ADV Part II and Schedule F (or a brochure that makes the appropriate disclosures). In addition, the FIRM and its Client will agree in writing that the Client’s account will be managed by that selected sub-advisor.</p> <p><u>Financial Planning:</u> In addition to investment supervisory services, Course Pilot Financial LLC may provide Financial Planning Services to some of its clients. The advisor’s Financial Planning services include custom management of portfolios based on their client’s investment objectives, goals and financial situation. It may also include providing investment strategies and general or tailored investment advice.</p>
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**Schedule F of  
Form ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
**Course Pilot Financial, LLC**

SEC File Number:

Date:  
**04/03/2006**

(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:		IRS Empl. Ident. No.:								
<b>1A(7)</b>	Course Pilot Financial LLC will offer advice to clients on private business and real estate investment in addition to general personal financial advice.									
<b>1C</b>	<p><u>Fees:</u> Course Pilot Financial LLC intends to be compensated for its investment advisory services by charging the following fees:</p> <p><u>Management Fee:</u> Pursuant to an investment advisory contract signed by each client, the client will pay Course Pilot Financial LLC a quarterly Management Fee, payable in advance, based on the amount of the assets to be managed by the advisor as of the close of business on the last business day of each quarter.</p> <table> <tr> <td>\$ 100,000 – 999,999</td> <td>1.25 %</td> </tr> <tr> <td>1,000,000 – 2,999,999</td> <td>1.00 %</td> </tr> <tr> <td>3,000,000 – 4,999,999</td> <td>0.75 %</td> </tr> <tr> <td>5 million plus</td> <td>0.50 %</td> </tr> </table> <p>These fees may be negotiated by the advisor under unusual circumstances, at the sole discretion of the advisor.</p> <p>All fees paid to Course Pilot Financial LLC for investment advisory services are separate and distinct from the 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 Course Pilot Financial LLC. In that case, the client would not receive the services provided by Course Pilot Financial LLC 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 Course Pilot Financial LLC to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.</p> <p>Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisors fee is separate and distinct from the custodian and execution fees.</p> <p>Clients may request to terminate their advisory contract with Course Pilot Financial LLC, in whole or in part, by giving thirty days advance written notice. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client. Client’s advisory agreement with the Advisor is non-transferable without Client’s written approval.</p> <p><u>Hourly and Fixed Fees:</u> Some clients will contract to have investment advisory advice and/or financial planning advice provided based on an hourly fee rather than based on the assets under management. The advisors hourly fee will be billed at a rate of \$300 per hour. Course Pilot Financial LLC will charge \$3000 per plan as contracted for with client in advance. Said fixed fee may be negotiated in advance based at the</p>		\$ 100,000 – 999,999	1.25 %	1,000,000 – 2,999,999	1.00 %	3,000,000 – 4,999,999	0.75 %	5 million plus	0.50 %
\$ 100,000 – 999,999	1.25 %									
1,000,000 – 2,999,999	1.00 %									
3,000,000 – 4,999,999	0.75 %									
5 million plus	0.50 %									
<b>1C(2)(3)</b>										

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

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

Applicant:  
**Course Pilot Financial, LLC**

SEC File Number:

Date:  
**04/03/2006**

(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:	IRS Empl. Ident. No.:
	discretion of the advisor based on a prior business relationship.
<b>5</b>	<p><u><i>Educational and Business Standards:</i></u></p> <p>Course Pilot Financial LLC requires that persons providing investment advice should be an Investment Advisor Representative with a Bachelors Degree in a related field.</p>
<b>6</b>          <b>9E</b>	<p><u><i>Education and Business Background:</i></u></p> <p>Michael Langford II (DOB: 1972) Boston University Graduate School of Management, MBA, Graduated with Honors, 2001 Currently working toward Certified Financial Planner designation.</p> <p>Fidelity Investments and State Street Corporation, worked as an Analyst for a period of 12 years with both retail and institutional businesses.</p> <p>Course Pilot Financial LLC 's financial advisors will from time to time purchase or sell products that they may advise. Restrictions are they must place the client's interest first. They may not purchase a security that they are recommending they sell or vice versa. Supervisory Principals must review trades daily to ensure clients orders were handled first and they review for cross trades with a client since that is prohibited.</p>
<b>10</b>	Course Pilot Financial LLC minimum account is \$100,000. However, based on prior relationships and other negotiable circumstances, applicant may accept accounts with a lower value.
<b>11A.B.</b>	<p>Michael Langford II is an Investment Adviser Representative of Course Pilot Financial LLC and will be reviewing client accounts.</p> <p>Accounts are monitored on an ongoing basis. The client will receive written or electronic statements no less than quarterly from the trustee or custodian. In addition, the client will receive other supporting reports from Mutual Funds, Asset Managers, Trust Companies or Custodians, Insurance Companies, Broker/Dealers and others who are involved with client accounts.</p> <p>The client is encouraged to notify the Advisor and IAR if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.</p>

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

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

Applicant:  
**Course Pilot Financial, LLC**

SEC File Number:

Date:  
**04/03/2006**

(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:	IRS Empl. Ident. No.:
	<p>Asset Allocation Accounts are re-balanced on a quarterly basis and re-optimized when deemed necessary by the Advisor or by third-party money manager for those participating in the Asset Management Program. Re-balancing is accomplished by reallocating assets to original asset targets and re-optimizing involves setting new target asset category percentages.</p>
<p><b>12A</b></p>	<p><u>Investment Discretion:</u> Generally, Clients grant Course Pilot Financial LLC complete discretion over the selection and amount of securities to be bought or sold for their account (within the parameters established by their Advisory Agreement) without obtaining their consent or approval. However, these purchases may be subject to specified investment objectives and guidelines. For example, a Client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio.</p> <p>Discretionary authority will only be authorized upon full disclosure to the client and by that client specifically authorizing said authority through the execution of an Investment Advisory Agreement. All discretionary trades made by Course Pilot Financial LLC on behalf of their discretionary accounts (clients) will be in accordance with that client's investment objectives and goals.</p> <p>Course Pilot Financial LLC may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular client accounts. For example, a partial fill will generally be filled pro-rata among participating accounts. Prior to entry of a block trade, a written pre-allocation will be generated which identifies the group of client accounts participating in the order.</p> <p>Changes in allocation prior to final allocation may be made for good cause provided that all client accounts receive fair and equitable treatment. A written explanation of the reason for any material change in the allocation must be provided to and approved by the Compliance Officer no later than the morning following the execution of the trade. If the change in the allocation is the result of a condition that exists or a change in the client's account outside of the portfolio manager's control, then approval by the Compliance Officer is not required.</p> <p><u>Selection of Brokers:</u> Course Pilot Financial LLC ("Firm") generally has investment discretion to place portfolio transactions and select brokers without the prior approval of clients. The Firm seeks to obtain the most favorable net results for clients price, execution quality, services and commissions. Although the Firm seeks competitive commission rates, it may at times pay commissions on behalf of clients which may be higher than those available from other brokers in order to achieve superior execution or services. The Firm may enter such transaction so long as it determines in good faith that the amount of commission paid was reasonable in relation to the value of the brokerage and research services provided by the broker. The services that may be considered in this determination of reasonableness include (1) advice, either directly or through publications or writing, as to the value of securities, the advisability of investing in, purchasing or selling securities, and the availability of securities or purchasers or sellers of securities; (2) analysis and reports concerning issuers, industries, securities, economic factors and</p>
<p><b>12B</b></p>	

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

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

Applicant:  
**Course Pilot Financial, LLC**

SEC File Number:

Date:  
**04/03/2006**

(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:	IRS Empl. Ident. No.:
<b>13B</b>	<p>trends, portfolio strategy, and the performance of accounts; or (3) effecting securities transactions and performing functions incidental thereto.</p> <p><i>Brokerage Recommendation:</i> In circumstances where Course Pilot Financial LLC (“FIRM”) will not exercise brokerage discretion, it will recommend brokers to clients for execution and/or custodial services FIRM is not affiliated with any broker. The FIRM receives no compensation of any kind from any broker, regardless of whether a client uses that broker. Clients may choose any broker or combination of brokers they wish to custody their assets. If requested by the client, the FIRM may suggest brokers for the client to use. There will be no pressure to use the recommended broker and no extra fee or cost associated with the client using a broker not recommended by the FIRM. The FIRM may recommend brokers based on criteria such as, but not limited to, reasonableness of commissions charged to the client, internet services made available to the client, and location of broker offices.</p> <p>For Massachusetts Residents: Course Pilot Financial LLC’s disciplinary history may be obtained by contacting the Securities Division of the Secretary of the Commonwealth at 617-727-3548.</p> <p>Course Pilot Financial LLC may compensate persons or firms for client referrals in compliance with state securities rules and regulations. The fees paid to referral sources do not affect the fees clients pay to Course Pilot Financial LLC. In each instance, a written agreement will exist between the Advisor and the referral source. At the time of a referral, prospective advisory clients will receive the Advisor’s ADV Part II and a Compensation Disclosure Document. Per STATE law, that solicitor would need to be registered either as an IAR of the Advisor or another advisory firm, prior to any solicitation of business. The Course Pilot Financial LLC has established policies and procedures to ensure that its solicitation activities are compliant with the requirements under Rule 206(4)-3 of the Adviser’s Act.</p>
	<p style="text-align: center;"><b><u>Code Of Ethics</u></b></p> <p>Course Pilot Financial LLC maintains a code of ethics and they will provide a copy to any client or prospective client upon request.</p> <p style="text-align: center;"><b><u>Proxy Voting</u></b></p> <p>Course Pilot Financial LLC will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, Course Pilot Financial, LLC cannot give any advice or take any action with respect to the voting of these proxies. The client and Course Pilot Financial LLC agree to this by contract.</p> <p>For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 (“ERISA”), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. Also, Course Pilot Financial LLC cannot give any advice or take action with respect to the voting of these proxies.</p>

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

Applicant:  
**Course Pilot Financial, LLC**

SEC File Number:

Date:  
**04/03/2006**

(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:

IRS Empl. Ident. No.:

**Privacy Policy**

Course Pilot Financial LLC never discloses the nonpublic personal information collected about its clients to anyone except in furtherance of our business relationship, and then only to those persons necessary to effect the transactions and provide the services that Client authorize (such as broker-dealers, custodians, investment managers etc.) or as otherwise provided by law.

Massachusetts's law (950 CMR 12-205(9)(C) 13 MGL 110A) prohibits us from disclosing the nonpublic personal information about you to other third parties unless we have your prior written consent. If you decide at some point to either terminate my services or become an inactive customer, we shall continue to adhere to this privacy policy.