

FORM ADV
UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

Primary Business Name: BREWER INVESTMENT ADVISORS LLC

CRD Number: 134631

ADV-Other-Than-Annual Amendment, Part 2

Rev. 02/2005

9/23/2010 10:54:39 AM

Amend, retire or file new brochures:		
Brochure ID	Brochure Name	Brochure Type(s)
28153	BIA ADV PART II & SCH F 091710	Individuals, High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Financial Planning Services, Selection of Other Advisers/Solicitors

FORM ADV
UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

Primary Business Name: BREWER INVESTMENT ADVISORS LLC

CRD Number: 134631

ADV - Other-Than-Annual Amendment, SCHEDULE A

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Form ADV, Schedule A

Direct Owners and Executive Officers

1. Complete Schedule A only if you are submitting an initial application. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.

2. Direct Owners and Executive Officers. List below the names of:

(a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer(Chief Compliance Officer is required and cannot be more than one individual), director, and any other individuals with similar status or functions;

(b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);

Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

(c) if you are organized as a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;

(d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and

(e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.

3. Do you have any indirect owners to be reported on Schedule B? ☒ Yes ☐ No

4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.

5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).

6. Ownership codes are: NA - less than 5% B - 10% but less than 25% D - 50% but less than 75%
 A - 5% but less than 10% C - 25% but less than 50% E - 75% or more

7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.

(b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.

(c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Title or Status	Date Title or Status Acquired MM/YYYY	Ownership Code	<i>Control Person</i>	PR	CRD No. If None: S.S. No. and Date of Birth, IRS Tax No., or Employer ID No.
BREWER INVESTMENT GROUP	DE	PARENT COMPANY	02/2004	E	Y	N	
LISHCHYNSKY, MARK, JOHN	I	CHIEF COMPLIANCE OFFICER, MANAGING MEMBER	03/2009	NA	Y	N	2478952
ERICKSON, ADAM, GARY	I	MANAGING MEMBER/ PRESIDENT	02/2010	NA	Y	N	3081286

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Form ADV, Schedule B

Indirect Owners

1. Complete Schedule B only if you are submitting an initial application. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:

(a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

(b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;

(c) in the case of an owner that is a trust, the trust and each trustee; and

(d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are: C - 25% but less than 50% E - 75% or more
D - 50% but less than 75% F - Other (general partner, trustee, or elected manager)
7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
(b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
(c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity in Which Interest is Owned	Status	Date Status Acquired MM/YYYY	Ownership Code	<i>Control Person</i>	PR	CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
BREWER, STEVEN, JOHN	I	BREWER INVESTMENT GROUP	MEMBER	02/2004	E	N	Y	2214515

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ADV - Other-Than-Annual Amendment, SCHEDULE C

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Form ADV, Schedule C

Amendments to Schedules A and B

1. Use Schedule C only to amend information requested on either Schedule A or Schedule B. Refer to Schedule A and Schedule B for specific instructions for completing this Schedule C. Complete each column.
2. In the Type of Amendment column, indicate "A" (addition), "D" (deletion), or "C" (change in information about the same *person*).
3. Ownership codes are: NA - less than 5% C - 25% but less than 50% G - Other (general partner, trustee, or elected member)
A - 5% but less than 10% D - 50% but less than 75%
B - 10% but less than 25% E - 75% or more
4. List below all changes to Schedule A (Direct Owners and Executive Officers):

No Changes to Direct Owner / Executive Officer Information Filed
5. List below all changes to Schedule B (Indirect Owners):

No Changes to Indirect Owner Information Filed

FORM ADV
UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

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ADV - Other-Than-Annual Amendment, SCHEDULE D Page 1

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Form ADV, Schedule D Page 1

Certain items in Part 1A of Form ADV require additional information on Schedule D. Use this Schedule D Page 1 to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.

Section 1.B. Other Business Names

List your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D for each business name.

BRICKEY WEALTH MANAGEMENT, LLC	AL,AR,MS,NC,SC,TN,TX
MARNELL FINANCIAL SERVICES, LTD, A DIVISION OF ADVISOR EDGE FINANCIAL GROUP	AZ,AR,CA,CO,CT,IL,MI,MN,TX
CORE FINANCIAL ADVISORY, LLC	VA
BLAKE GROUP ADVISORS	AL,AR,CO,FL,MS,MO,NC,TN,TX
BREWER INVESTMENT GROUP, LLC	AL,AK,AZ,CA,CO,CT,FL,GA,IL,IN,IA,KS,LA,ME,MD,MA,MI,MN,MS,MO,NE,NH,NJ,NM,NY,NC,OH,PA,SC,SD,TN,TX,VA,WA,WI
GUY ABBANAT AND ASSOCIATES, LLC	AZ,CO,CT,FL,IL,NJ,NY,SC
GRANITE MANAGED FINANCIAL SERVICES, LLC	TX
SAI FINANCIAL SERVICES, INC, A DIVISION OF ADVISOR EDGE FINANCIAL GROUP	AL,AZ,AR,CA,CO,CT,FL,GA,IL,IN,IA,MO,NE,NH,NJ,NC,OH,OR,PA,SC,SD,TX,WA
DOGWOOD CAPITAL MANAGEMENT, LLC	CA,FL,IL,LA,NH,NC,SC,VA,WA
BREWER INVESTMENT ADVISORS, LLC	AL,AK,AZ,CA,CO,CT,FL,GA,IL,IN,IA,KS,LA,ME,MD,MA,MI,MN,MS,MO,NE,NH,NJ,NM,NY,NC,OH,PA,SC,SD,TN,TX,VA,WA,WI
PIVOTAL FINANCIAL, LLC	AL,CA,CO,FL,GA,IL,NY,NC,PA,VA,WA
M-G FINANCIAL, INC	AZ,CA,CT,FL,IL,MD,MI,MN,MO,NY,OH,OR,WI
BANNERMAN WEALTH MANAGEMENT GROUP	CA,FL,IN,IA,MA,MI,MN,TN,WA
STEVE BROWN AND ASSOCIATES, LLC	AL,CA,CO,CT,IA,NM,TX,VA
RFW WEALTH ADVISORS	AL,CO,FL,GA,IL,LA,MD,MI,NJ,NY,OH,PA,SC,TN,TX,VA
BLACK ROCK CAPITAL PARTNERS, LLC	FL,WI
GROSSMAN COHEN & DIAMOND, LLC	CA,IL,NC,WI
GRECO PLANNING GROUP, INC	MO,NJ,NY
STOCKTON WOLF AND ASSOCIATES	CO,FL,KS,NC,TX,WA
AHM ASSET MANAGEMENT, LLC	GA,IL,MO,NE
BREWER INVESTMENT GROUP	AL,AK,AZ,CA,CO,CT,FL,GA,IL,IN,IA,KS,LA,ME,MD,MA,MI,MN,MS,MO,NE,NH,NJ,NM,NY,NC,OH,PA,SC,SD,TN,TX,VA,WA,WI

Section 1.F. Other Offices

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

Number and Street 1: 123 ANDERSON ST		Number and Street 2:	
City: FAYETTEVILLE	State: NC	Country: United States	ZIP+4/Postal Code: 28301
If this address is a private residence, check this box: <input type="checkbox"/>			
Telephone Number at this location: 901-484-1114		Facsimile number at this location: 910-484-1113	
Number and Street 1: 2809 W. WILLOW KNOLLS RD		Number and Street 2: SUITE B	
City: PEORIA	State: IL	Country: United States	ZIP+4/Postal Code: 61614
If this address is a private residence, check this box: <input type="checkbox"/>			
Telephone Number at this location: 309-693-2321		Facsimile number at this location: 309-693-2430	
Number and Street 1: 1123 RIDERS CLUB ROAD		Number and Street 2:	
City: ONALASKA	State: WI	Country: United States	ZIP+4/Postal Code: 54650
If this address is a private residence, check this box: <input type="checkbox"/>			
Telephone Number at this location: 608-781-9244		Facsimile number at this location: 608-781-5966	
Number and Street 1: 4776 HODGES BOULEVARD		Number and Street 2: SUITE 203	
City: JACKSONVILLE	State: FL	Country: United States	ZIP+4/Postal Code: 32224
If this address is a private residence, check this box: <input type="checkbox"/>			
Telephone Number at this location: 904-517-5410		Facsimile number at this location: 904-517-5415	
Number and Street 1: 305 B WEST SPRING CREEK PARKWAY		Number and Street 2: SUITE 400	
City: PLANO	State: TX	Country: United States	ZIP+4/Postal Code: 75023
If this address is a private residence, check this box: <input type="checkbox"/>			
Telephone Number at this location: 972-372-2940		Facsimile number at this location: 214-572-9328	

Section 1.I. World Wide Web Site Addresses

List your World Wide Web site addresses. You must complete a separate Schedule D for each World Wide Web site address.

World Wide Web Site Address: HTTP://WWW.BREWERSERVICES.COM/INVESTMENTADVISORS/INVESTMENTADVISORS.HTM

World Wide Web Site Address: WWW.CARVERWEALTHMANAGEMENTGROUP.COM

World Wide Web Site Address: WWW.INTWEALTHADVISORS.COM

World Wide Web Site Address: WWW.M-GFINANCIAL.COM

Section 1.K. Locations of Books and Records

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D Page 1 for each location.

No Information Filed

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Form ADV, Schedule D Page 2

Use this Schedule D Page 2 to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.

Section 1.L. Registration with *Foreign Financial Regulatory Authorities*

List the name, in English, of each *foreign financial regulatory authority* and country with which you are registered. You must complete a separate Schedule D Page 2 for each *foreign financial regulatory authority* with whom you are registered.

No Information Filed

Section 2.A(7) Affiliated Adviser

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

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser (if any)

SEC Number of Registered Investment Adviser
801-

Section 2.A(8) Newly Formed Adviser

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

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

Section 2.A(9) Multi-State Adviser

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

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

- ☐ I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 30 or more states to register as an investment adviser with the securities authorities in those states.
- ☐ I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 25 states to register as an investment adviser with the securities authorities of those states.

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

- ☐ Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 25 states to register as an investment adviser with the securities authorities in those states.

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UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

Form ADV, Schedule D Page 3

Use this Schedule D Page 3 to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.

Section 2.A(11) SEC Exemptive Order

No Information Filed

Section 4 Successions

Complete the following information if you are succeeding to the business of a currently-registered investment adviser. If you acquired more than one firm in the succession you are reporting on this Form ADV, you must complete a separate Schedule D Page 3 for each acquired firm. See Part 1A Instruction 4.

No Information Filed

Section 5.I(2) Wrap Fee Programs

If you are a portfolio manager for one or more *wrap fee programs*, list the name of each program and its *sponsor*. You must complete a separate Schedule D Page 3 for each *wrap fee program* for which you are a portfolio manager.

Name of *Wrap Fee Program*
BIA IAR ADVISED NON-DISCRETIONARY INVESTMENT PROGRAM (BIANDIP)

Name of *Sponsor*
BREWER INVESTMENT ADVISORS, LLC

Name of *Wrap Fee Program*
BIA IAR DIRECTED DISCRETIONARY INVESTMENT PROGRAM (BIDDIP)

Name of *Sponsor*
BREWER INVESTMENT ADVISORS, LLC

Name of *Wrap Fee Program*
BIA MODEL ALLOCATION PROGRAM (BMAP)

Name of *Sponsor*
BREWER INVESTMENT ADVISORS, LLC

Name of *Wrap Fee Program*
BIA MOMENTUM PROGRAM (BMP)

Name of *Sponsor*
BREWER INVESTMENT ADVISORS, LLC

Name of *Wrap Fee Program*
MANAGED ACCOUNT SOLUTIONS PROGRAM ("MAS")

Name of *Sponsor*
ENVESTNET ASSET MANAGEMENT, INC.

Section 6.B. Description of Primary Business

No Information Filed

Section 7.A. Affiliated Investment Advisers and Broker-Dealers

You MUST complete the following information for each investment adviser with whom you are affiliated. You MAY complete the following information for each broker-dealer with whom you are affiliated. You must complete a separate Schedule D Page 3 for each listed affiliate.

Legal Name of Affiliate:
BREWER FINANCIAL SERVICES, LLC

Primary Business Name of Affiliate:
BREWER FINANCIAL SERVICES, LLC

- Affiliate is (check only one box):
- ☐ Investment Adviser
 - ☒ Broker - Dealer
 - ☐ Dual (Investment Adviser and Broker-Dealer)

Affiliated Investment Adviser's SEC File Number (if any)
801-

Affiliate's CRD Number (if any):
132558

FORM ADV
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Form ADV, Schedule D Page 4
Use this Schedule D Page 4 to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.

Section 7.B. Limited Partnership Participation or Other Private Fund Participation

You must complete a separate Schedule D Page 4 for each limited partnership in which you or a *related person* is a general partner, each limited liability company for which you or a *related person* is a manager, and each other private fund that you advise.

Name of Limited Partnership, Limited Liability Company, or other Private Fund:
BIG MANAGEMENT HOLDINGS, LLC

Name of General Partner or Manager:
STEVEN J. BREWER; CHERYL A. ARTS; ADAM G. ERICKSON; BOB WHALEN

If you are registered or registering with the SEC, is this a "private fund" as defined under SEC rule 203(b)(3)-1? Yes No

Are your *clients* solicited to invest in the limited partnership, limited liability company, or other private fund? Yes No

Approximately what percentage of your *clients* have invested in this limited partnership, limited liability company, or other private fund?
1 %

Minimum investment commitment required of a limited partner, member, or other investor:
\$ 25000

Current value of the total assets of the limited partnership, limited liability company, or other private fund:
\$ 1173000

Section 10 Control Persons

You must complete a separate Schedule D Page 4 for each *control person* not named in Item 1.A. or Schedules A, B, or C that directly or indirectly *controls* your management or policies.

No Information Filed

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Form ADV, Schedule D Page 5
Use this Schedule D Page 5 to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.

Schedule D - Miscellaneous

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

FORM ADV
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CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

GENERAL INSTRUCTIONS

This Disclosure Reporting Page (DRP ADV) is an ☐ INITIAL *OR* ☒ AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV.

Check item(s) being responded to:

Regulatory Action			
<input type="checkbox"/> 11.C(1)	<input type="checkbox"/> 11.C(5)	<input type="checkbox"/> 11.D(4)	<input checked="" type="checkbox"/> 11.E(3)
<input type="checkbox"/> 11.C(2)	<input type="checkbox"/> 11.D(1)	<input type="checkbox"/> 11.D(5)	<input type="checkbox"/> 11.E(4)
<input type="checkbox"/> 11.C(3)	<input type="checkbox"/> 11.D(2)	<input type="checkbox"/> 11.E(1)	<input type="checkbox"/> 11.F
<input type="checkbox"/> 11.C(4)	<input type="checkbox"/> 11.D(3)	<input checked="" type="checkbox"/> 11.E(2)	<input type="checkbox"/> 11.G

Use a separate DRP for each event or *proceeding*. The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details to each action on a separate DRP.

PART I

A The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

☐ You (the advisory firm)
☐ You and one or more of your *advisory affiliates*
☒ One or more of your *advisory affiliates*

If this DRP is being filed for an *advisory affiliate*, give the full name of the *advisory affiliate* below (for individuals, Last name, First name, Middle name).

If the *advisory affiliate* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate box.

ADV DRP - ADVISORY AFFILIATE

CRD Number:2214515

This *advisory affiliate* is ☐ a Firm ☒ an Individual

Registered:☒ Yes ☐ No

Name: BREWER, STEVEN, JOHN
(For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because: (1) the event or *proceeding* occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or *advisory affiliate's* favor.

If you are registered or registering with a *state securities authority*, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.

B. If the *advisory affiliate* is registered through the IARD system or *CRD* system, has the *advisory affiliate* submitted a DRP (with Form ADV, BD or U-4) to the IARD or *CRD* for the event? If the answer is "Yes," no other information on this DRP must be provided.

☐ Yes ☒ No

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or *CRD* records.

PART II

1. Regulatory Action initiated by:

☐ SEC ☐ Other Federal ☐ State ☒ SRO ☐ Foreign

(Full name of regulator, *foreign financial regulatory authority*, federal, state, or *SRO*)

NATIONAL FUTURES ASSOCIATION

2. Principal Sanction:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanctions:

3. Date Initiated (MM/DD/YYYY):

09/18/2003

ExactExplanation

If not exact, provide explanation:

4.

Docket/Case Number:
03 BC

5.

Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
BREWER INVESTMENT GROUP

6.

Principal Product Type:
Other
Other Product Types:
INTEREST IN A COMMODITY POOL

7.

Describe the allegations related to this regulatory action (your response must fit within the space provided):
ON SEPTEMBER 18, 2003, NFA'S BUSINESS CONDUCT COMMITTEE ("BCC") ISSUED A COMPLAINT TO BREWER INVESTMENT GROUP, INC. ("BIG") AND STEVEN BREWER ("BREWER"). THE COMPLAINT ALLEGES THAT BIG AND BREWER FAILED TO SUPERVISE, IN VIOLATION OF NFA COMPLIANCE RULE 2-9. THE COMPLAINT ALSO ALLEGES THAT BIG FAILED TO CORRECT A DEFICIENCY IN REGISTRATION FILING, IN VIOLATION OF NFA REGISTRATION RULE 2-10. THE COMPLAINT FURTHER ALLEGES THAT BIG FAILED TO PROVIDE COMPLETE AND ACCURATE REQUIRED INFORMATION TO POOL PARTICIPANTS, IN VIOLATION OF NFA COMPLIANCE RULE 213(A)

8.

Current status ? Pending On Appeal Final

9.

If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10.

How was matter resolved:
Settled
SETTLMNT

11.

Resolution Date (MM/DD/YYYY):
01/05/2004 Exact Explanation

If not exact, provide explanation:

12.

Resolution Detail:

A.

Were any of the following Sanctions Ordered (check all appropriate items)?

Monetary/Fine Amount:\$ 30000

Revocation/Expulsion/Denial

Censure

Bar

Disgorgement/Restitution

Cease and Desist/Injunction

Suspension

B.

Other Sanctions Ordered:
BIG AND BREWER ARE PROHIBITED FROM OPERATION ANY BRANCH OFFICES.

Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an advisory affiliate, date paid and if any portion of penalty was waived:
BIG AND BREWER ARE JOINT AND SEVERALLY LIABLE AND PAID A \$30,000 FINE.

13.

Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided.)
ON OCTOBER 6, 2003, BIG AND BREWER FILED AN ANSWER TO THE COMPLAINT IN WHICH THEY NEITHER DENIED THE MATERIAL ALLEGATIONS CONTAINED THEREIN AND REQUESTED A HEARING BEFORE NFA'S HEARING COMMITTEE. ON DECEMBER 19, 2003, NFA'S BCC ISSUED ITS DECISION ACCEPTING BIG AND BREWER'S SETTLEMENT OFFER IN WHICH THEY NEITHER ADMIT NOR DENY THE ALLEGATIONS MADE AGAINST THEM IN THE COMPLAINT AND CONSENT TO THE FINDINGS THAT THEY COMMITTED VIOLATIONS AS ALLEGED IN THE COMPLAINT. BREWER AND BIG'S MOTIVATION IN SETTLEMENT OCCURRED DUE TO THE HIGH COST OF LITIGATION.

GENERAL INSTRUCTIONS

This Disclosure Reporting Page (DRP ADV) is an INITIAL **OR** AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV.

Check item(s) being responded to:

Regulatory Action			
<div><div></div></div> 11.C(1)	<div><div></div></div> 11.C(5)	<div><div></div></div> 11.D(4)	<div><div></div></div> 11.E(3)
<div><div></div></div> 11.C(2)	<div><div></div></div> 11.D(1)	<div><div></div></div> 11.D(5)	<div><div></div></div> 11.E(4)
<div><div></div></div> 11.C(3)	<div><div></div></div> 11.D(2)	<div><div></div></div> 11.E(1)	<div><div></div></div> 11.F
<div><div></div></div> 11.C(4)	<div><div></div></div> 11.D(3)	<div><div></div></div> 11.E(2)	<div><div></div></div> 11.G

One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details to each action on a separate DRP.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

- ☐ You (the advisory firm)
- ☐ You and one or more of your *advisory affiliates*
- ☒ One or more of your *advisory affiliates*

If this DRP is being filed for an *advisory affiliate*, give the full name of the *advisory affiliate* below (for individuals, Last name, First name, Middle name).

If the *advisory affiliate* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate box.

ADV DRP - ADVISORY AFFILIATE

CRD Number:

2478952

This *advisory affiliate* is ☐ a Firm ☒ an Individual

Registered:

☒ Yes ☐ No

Name:

LISHCHYNSKY, MARK, JOHN

(For individuals, Last, First, Middle)

- ☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* is no longer associated with the adviser.
- ☐ This DRP should be removed from the ADV record because: (1) the event or *proceeding* occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or *advisory affiliate's* favor.

If you are registered or registering with a *state securities authority*, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.

B. If the *advisory affiliate* is registered through the IARD system or *CRD* system, has the *advisory affiliate* submitted a DRP (with Form ADV, BD or U-4) to the IARD or *CRD* for the event? If the answer is "Yes," no other information on this DRP must be provided.

- ☒ Yes ☐ No

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or *CRD* records.

PART II

1. Regulatory Action initiated by:

☐ SEC ☐ Other Federal ☐ State ☒ SRO ☐ Foreign

(Full name of regulator, *foreign financial regulatory authority*, federal, state, or *SRO*)

FINRA

2. Principal Sanction:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanctions:

3. Date Initiated (MM/DD/YYYY):

04/25/2008 ☒ Exact ☐ Explanation

If not exact, provide explanation:

4. Docket/Case Number:

2006003678601

5. *Advisory Affiliate* Employing Firm when activity occurred which led to the regulatory action (if applicable):

6. Principal Product Type:

No Product

Other Product Types:

7. Describe the allegations related to this regulatory action (your response must fit within the space provided):

NASD RULE 2110 - LISHCHYNSKY FAILED TO ENSURE THAT THE MEMBER FIRM'S OFFSITE FINOP WAS AWARE OF AT LEAST \$31,602.11 WORTH OF LIABILITIES AND THAT THE LIABILITIES WERE PROPERLY RECORDED ON THE FIRM'S BOOKS AND RECORDS

8. Current status ? ☐ Pending ☐ On Appeal ☒ Final

9. If on appeal, regulatory action appealed to (SEC, *SRO*, Federal or State Court) and Date Appeal Filed:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10. How was matter resolved:
Acceptance, Waiver & Consent(AWC)
AWC

11. Resolution Date (MM/DD/YYYY):
04/25/2008 ☒ Exact ☐ Explanation

If not exact, provide explanation:

12. Resolution Detail:

A. Were any of the following Sanctions *Ordered* (check all appropriate items)?

☒ Monetary/Fine Amount:\$ 5000
☒ Revocation/Expulsion/Denial
☐ Censure
☐ Bar

☐ Disgorgement/Restitution
☐ Cease and Desist/Injunction
☐ Suspension

B. Other Sanctions *Ordered*:

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate*, date paid and if any portion of penalty was waived:
WITHOUT ADMITTING OR DENYING THE FINDINGS, RESPONDENT CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS, THEREFORE, HE IS FINED \$5,000.00. PURSUANT TO FINRA RULE 8320, LISHCHYNSKY'S FINRA REGISTRATION IS REVOKED FOR FAILURE TO PAY FINES AND/OR COSTS. REVOCATION RESCINDED JUNE 19, 2009.

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided.)
WITHOUT ADMITTING OR DENYING THE FINDINGS, RESPONDENT CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS, THEREFORE, HE IS FINED \$5,000.00. PURSUANT TO FINRA RULE 8320, LISHCHYNSKY'S FINRA REGISTRATION IS REVOKED FOR FAILURE TO PAY FINES AND/OR COSTS. REVOCATION RESCINDED JUNE 19, 2009.

GENERAL INSTRUCTIONS

This Disclosure Reporting Page (DRP ADV) is an ☐ INITIAL **OR** ☒ AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV.

Check item(s) being responded to:

Regulatory Action			
<input type="checkbox"/> 11.C(1)	<input type="checkbox"/> 11.C(5)	<input type="checkbox"/> 11.D(4)	<input checked="" type="checkbox"/> 11.E(3)
<input type="checkbox"/> 11.C(2)	<input type="checkbox"/> 11.D(1)	<input type="checkbox"/> 11.D(5)	<input type="checkbox"/> 11.E(4)
<input type="checkbox"/> 11.C(3)	<input type="checkbox"/> 11.D(2)	<input type="checkbox"/> 11.E(1)	<input type="checkbox"/> 11.F
<input type="checkbox"/> 11.C(4)	<input type="checkbox"/> 11.D(3)	<input checked="" type="checkbox"/> 11.E(2)	<input type="checkbox"/> 11.G

Use a separate DRP for each event or *proceeding*. The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details to each action on a separate DRP.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):
☐ You (the advisory firm)
☐ You and one or more of your *advisory affiliates*
☒ One or more of your *advisory affiliates*

If this DRP is being filed for an *advisory affiliate*, give the full name of the *advisory affiliate* below (for individuals, Last name, First name, Middle name).

If the *advisory affiliate* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate box.

ADV DRP - ADVISORY AFFILIATE

CRD Number:2214515

This *advisory affiliate* is ☐ a Firm ☒ an Individual

Registered:☒ Yes ☐ No

Name: BREWER, STEVEN, JOHN
(For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because: (1) the event or *proceeding* occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or *advisory affiliate's* favor.

If you are registered or registering with a *state securities authority*, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.

B. If the *advisory affiliate* is registered through the IARD system or CRD system, has the *advisory affiliate* submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.

☒ Yes ☐ No

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or CRD records.

PART II

1. Regulatory Action initiated by:
☐ SEC ☐ Other Federal ☐ State ☒ SRO ☐ Foreign

(Full name of regulator, *foreign financial regulatory authority*, federal, state, or SRO)
NATIONAL FUTURES ASSOCIATION

2. Principal Sanction:
Civil and Administrative Penalt(ies) /Fine(s)
Other Sanctions:

3. Date Initiated (MM/DD/YYYY):
06/10/2009 ☒ Exact ☐ Explanation

If not exact, provide explanation:

4. Docket/Case Number:
09-BCC-014

5. *Advisory Affiliate* Employing Firm when activity occurred which led to the regulatory action (if applicable):
BREWER FUTURES GROUP LLC

6. Principal Product Type:
Futures - Commodity
Other Product Types:

7. Describe the allegations related to this regulatory action (your response must fit within the space provided):

FAILURE TO OBSERVE HIGH STANDARDS OF COMMERCIAL HONOR AND JUST AND EQUITABLE PRINCIPALS OF TRADE, FAILURE TO MAINTAIN REQUIRED BOOKS AND RECORDS, FAILURE TO MAINTAIN REQUIRED CAPITAL, AND FAILURE TO GIVE NOTICE AND FAILURE TO SUPERVISE

8. Current status ? ☐ Pending ☐ On Appeal ☒ Final

9. If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10. How was matter resolved:
Acceptance, Waiver & Consent(AWC)
AWC

11. Resolution Date (MM/DD/YYYY):
04/15/2010 ☒ Exact ☐ Explanation

If not exact, provide explanation:

12. Resolution Detail:

A. Were any of the following Sanctions *Ordered* (check all appropriate items)?

☒ Monetary/Fine Amount:\$ 100000☐ Revocation/Expulsion/Denial☐ Censure

☐ Bar

☐ Disgorgement/Restitution

☐ Cease and Desist/Injunction

☐ Suspension

B. Other Sanctions Ordered:

NEITHER BFG(BREWER FUTURES GROUP)NOR ANY OTHER NFA MEMBER OF WHICH BREWER IS A PRINCIPAL SHALL BE REGISTERED AS AN FCM IN THE FUTURE AND, IN THE EVENT THAT BFG OR ANY OTHER NFA MEMBER OF WHICH BREWER IS A PRINCIPAL IS REGISTERED AS AN IB AT ANY THIME AFTER 30 DAYS HAVE PASSED FOLLOWING THE ISSUANCE OF THIS DECISION, SUCH NFA MEMBER SHALL ONLY OPERATE PURSUANT TO A VALID GUARANTEE AGREEMENT.

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against

you or an *advisory affiliate*, date paid and if any portion of penalty was waived:
NEITHER BFG(BREWER FUTURES GROUP)NOR ANY OTHER NFA MEMBER OF WHICH BREWER IS A PRINCIPAL SHALL BE REGISTERED AS AN FCM IN THE FUTURE AND, IN THE EVENT THAT BFG OR ANY OTHER NFA MEMBER OF WHICH BREWER IS A PRINCIPAL IS REGISTERED AS AN IB AT ANY THIME AFTER 30 DAYS HAVE PASSED FOLLOWING THE ISSUANCE OF THIS DECISION, SUCH NFA MEMBER SHALL ONLY OPERATE PURSUANT TO A VALID GUARANTEE AGREEMENT.

13.

Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided.)
SETTLEMENT REACHED ON THE ALLEDGED VIOLATIONS.

GENERAL INSTRUCTIONS

This Disclosure Reporting Page (DRP ADV) is an ☐ INITIAL **OR** ☒ AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV.

Check item(s) being responded to:

Regulatory Action			
<input type="checkbox"/> 11.C(1)	<input type="checkbox"/> 11.C(5)	<input type="checkbox"/> 11.D(4)	<input checked="" type="checkbox"/> 11.E(3)
<input type="checkbox"/> 11.C(2)	<input type="checkbox"/> 11.D(1)	<input type="checkbox"/> 11.D(5)	<input type="checkbox"/> 11.E(4)
<input type="checkbox"/> 11.C(3)	<input type="checkbox"/> 11.D(2)	<input type="checkbox"/> 11.E(1)	<input type="checkbox"/> 11.F
<input type="checkbox"/> 11.C(4)	<input type="checkbox"/> 11.D(3)	<input checked="" type="checkbox"/> 11.E(2)	<input type="checkbox"/> 11.G

Use a separate DRP for each event or *proceeding*. The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details to each action on a separate DRP.

PART I

A

The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

☐ You (the advisory firm)
☐ You and one or more of your *advisory affiliates*
☒ One or more of your *advisory affiliates*

If this DRP is being filed for an *advisory affiliate*, give the full name of the *advisory affiliate* below (for individuals, Last name, First name, Middle name).

If the *advisory affiliate* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate box.

ADV DRP - ADVISORY AFFILIATE

CRD Number:

2214515

This *advisory affiliate* is ☐ a Firm ☒ an Individual

Registered:

☒ Yes ☐ No

Name:

BREWER, STEVEN, JOHN
(For individuals, Last, First, Middle)

☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* is no longer associated with the adviser.

☐ This DRP should be removed from the ADV record because: (1) the event or *proceeding* occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or *advisory affiliate's* favor.

If you are registered or registering with a *state securities authority*, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.

B.

If the *advisory affiliate* is registered through the IARD system or *CRD* system, has the *advisory affiliate* submitted a DRP (with Form ADV, BD or U-4) to the IARD or *CRD* for the event? If the answer is "Yes," no other information on this DRP must be provided.

☒ Yes ☐ No

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or *CRD* records.

PART II

1.

Regulatory Action initiated by:

☐ SEC ☐ Other Federal ☐ State ☒ SRO ☐ Foreign

(Full name of regulator, *foreign financial regulatory authority*, federal, state, or SRO)
NATIONAL FUTURES ASSOCIATION

2.

Principal Sanction:
Civil and Administrative Penalt(ies) /Fine(s)
Other Sanctions:

3. Date Initiated (MM/DD/YYYY):
05/23/2006 ☒ Exact ☐ Explanation

If not exact, provide explanation:

4. Docket/Case Number:
06-BCC-008

5. *Advisory Affiliate* Employing Firm when activity occurred which led to the regulatory action (if applicable):
BREWER FUTURES GROUP LLC

6. Principal Product Type:
No Product
Other Product Types:

7. Describe the allegations related to this regulatory action (your response must fit within the space provided):
NFA COMPLAINT ALLEGES VIOLATION OF C.R.2-9(A): FAILURE TO SUPERVISE EMPLOYEES WITH RESPECT TO THEIR FUTURES RELATED ACTIVITIES.

8. Current status ? ☐ Pending ☐ On Appeal ☒ Final

9. If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10. How was matter resolved:
Decision
DECISION

11. Resolution Date (MM/DD/YYYY):
03/16/2007 ☒ Exact ☐ Explanation

If not exact, provide explanation:

12. Resolution Detail:

A. Were any of the following Sanctions *Ordered* (check all appropriate items)?

☒ Monetary/Fine Amount:\$ 45000

☐ Revocation/Expulsion/Denial

☐ Censure

☐ Bar

☐ Disgorgement/Restitution

☐ Cease and Desist/Injunction

☐ Suspension

B. Other Sanctions *Ordered*:

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate*, date paid and if any portion of penalty was waived:
WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT CONSENTED TO THE INCLUSION OF FINDINGS IN THE PANEL'S DECISION; THEREFORE, THE PANEL ORDERS THAT BREWER IS FINED \$45,000 JOINTLY AND SEVERALLY; ORDERED THAT ANY NFA MEMBER OF WHICH BREWER IS A PRINCIPAL SHALL NOT APPLY FOR REGISTRATION AS A CPO, NOT TO OPERATE ANY COMMODITY POOLS, USE ANY PROMOTIONAL MATERIAL UNLESS SUCH MATERIAL HAS BEEN SPECIFICALLY APPROVED BY NFA PRIOR TO FIRST USE, AND SHALL NOT EMPLOY AN AP WHO HAS BEEN SPONSORED BY A MEMBER THAT IS ON NFA'S LIST OF FIRMS THAT HAVE BEEN DISCIPLINED FOR SALES PRACTICE FRAUD; AND THE NUMBER OF APS THAT NFA MEMBER OF WHICH BREWER IS A PRINCIPAL MAY SPONSOR, SHALL BE LIMITED.

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided.)
WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT CONSENTED TO THE INCLUSION OF FINDINGS IN THE PANEL'S DECISION; THEREFORE, THE PANEL ORDERS THAT BREWER IS FINED \$45,000 JOINTLY AND SEVERALLY; ORDERED THAT ANY NFA MEMBER OF WHICH BREWER IS A PRINCIPAL SHALL NOT APPLY FOR REGISTRATION AS A CPO, NOT TO OPERATE ANY COMMODITY POOLS, USE ANY PROMOTIONAL MATERIAL UNLESS SUCH MATERIAL HAS BEEN SPECIFICALLY APPROVED BY NFA PRIOR TO FIRST USE, AND SHALL NOT EMPLOY AN AP WHO HAS BEEN SPONSORED BY A MEMBER THAT IS ON NFA'S LIST OF FIRMS THAT HAVE BEEN DISCIPLINED FOR SALES PRACTICE FRAUD; AND THE NUMBER OF APS THAT NFA MEMBER OF WHICH BREWER IS A PRINCIPAL MAY SPONSOR, SHALL BE LIMITED.

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)	
	No Information Filed
Bond DRPs	
	No Information Filed
Judgment/Lien DRPs	
	No Information Filed
Arbitration DRPs	
	No Information Filed

FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

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

Appointment of Agent for Service of Process

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

Signature

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

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

Signature:	Date: MM/DD/YYYY
PATRICIA I CRAWFORD	09/23/2010
Printed Name:	Title:
PATRICIA I CRAWFORD	COMPLIANCE PRINCIPAL
Adviser CRD Number:	
134631	

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

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

1. Appointment of Agent for Service of Process

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

2. Appointment and Consent: Effect on Partnerships

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

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

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

Signature

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

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

and records to make them available to federal and state regulatory representatives.

Signature:

Date: MM/DD/YYYY

Printed Name:

Title:

Adviser *CRD* Number:

134631

State Registered Investment Adviser Execution Page

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial application for state registration and all amendments to registration.

1. Appointment of Agent for Service of Process

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

2. State-Registered Investment Adviser Affidavit

If you are subject to state regulation, by signing this Form ADV, you represent that, you are in compliance with the registration requirements of the state in which you maintain your principal place of business and are in compliance with the bonding, capital, and recordkeeping requirements of that state.

Signature

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

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

Signature

Date MM/DD/YYYY

CRD Number

134631

Printed Name

Title