

FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

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

Name of Investment Adviser: Fountain Strategies, LLC				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
938 W. Carmel Valley Road	Carmel Valley	CA	93924	(831) 298-7036

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.

Table of Contents

<u>Item Number</u>	<u>Item</u>	<u>Page</u>
1	Advisory Services and Fees	2
2	Types of Clients	2
3	Types of Investments	3
4	Methods of Analysis, Sources of Information and Investment Strategies	3
5	Education and Business Standards	4
6	Education and Business Background	4
7	Other Business Activities	4
8	Other Financial Industry Activities or Affiliations	4
9	Participation or Interest in Client Transactions	5
10	Conditions for Managing Accounts	5
11	Review of Accounts	5
12	Investment or Brokerage Discretion	6
13	Additional Compensation	6
14	Balance Sheet	6
	Continuation Sheet	Schedule F
	Balance Sheet, if required.	Schedule G

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

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

Applicant: Fountain Strategies, LLC	SEC File Number: 801-	Date: 12/16/2009
---	--------------------------	---------------------

1. **A. Advisory Services and Fees.** (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

<input checked="" type="checkbox"/> (1) Provides investment supervisory services	<u>50%</u>
<input type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services	<u> %</u>
<input type="checkbox"/> (3) Furnishes investment advice through consultations not included in either service described above	<u> %</u>
<input type="checkbox"/> (4) Issues periodicals about securities by subscription	<u> %</u>
<input type="checkbox"/> (5) Issues special reports about securities not included in any service described above	<u> %</u>
<input type="checkbox"/> (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities	<u> %</u>
<input checked="" type="checkbox"/> (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	<u>50%</u>
<input type="checkbox"/> (8) Provides a timing service	<u> %</u>
<input type="checkbox"/> (9) Furnishes advice about securities in any manner not described above	<u> %</u>

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

B. Does applicant call any of the services it checked above financial planning or some similar term? Yes 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 type="checkbox"/> (2) Hourly charges	<input type="checkbox"/> (5) Commissions
<input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees)	<input type="checkbox"/> (6) Other

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

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

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

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

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

Applicant:

Fountain Strategies, LLC

SEC File Number:

801-

Date:

12/16/2009

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"/> (1) exchange-listed securities
<input checked="" type="checkbox"/> (2) securities traded over-the-counter
<input checked="" type="checkbox"/> (3) foreign issues

<input checked="" type="checkbox"/> B. Warrants

<input checked="" type="checkbox"/> C. Corporate debt securities
(other than commercial paper)

<input type="checkbox"/> D. Commercial paper

<input checked="" type="checkbox"/> E. Certificates of deposit

<input checked="" type="checkbox"/> F. Municipal securities

G. Investment company securities:
<input checked="" type="checkbox"/> (1) variable life insurance
<input checked="" type="checkbox"/> (2) variable annuities
<input checked="" type="checkbox"/> (3) mutual fund shares | <input checked="" type="checkbox"/> H. United States government securities

I. Options contracts on:
<input type="checkbox"/> (1) securities
<input type="checkbox"/> (2) commodities

J. Futures contracts on:
<input type="checkbox"/> (1) tangibles
<input type="checkbox"/> (2) intangibles

K. Interests in partnerships investing in:
<input checked="" type="checkbox"/> (1) real estate
<input checked="" type="checkbox"/> (2) oil and gas interests
<input type="checkbox"/> (3) other (explain on Schedule F)

<input type="checkbox"/> L. Other (explain on Schedule F) |
|---|--|

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

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

- | | |
|---|---|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" 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 type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the
Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input 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 type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options, uncovered
options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

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

Applicant: Fountain Strategies, LLC	SEC File Number: 801-	Date: 12/16/2009
---	--------------------------	---------------------

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No
 (If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

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

On Schedule F, give the:

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

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

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

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

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

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

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

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

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

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

Applicant: Fountain Strategies, LLC	SEC File Number: 801-	Date: 12/16/2009
---	--------------------------	---------------------

9. Participation or Interest in Client Transactions.

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

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

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

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

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

(If yes, describe on Schedule F.)

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

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

Fountain IAR's review their client accounts and financial plan at least quarterly. Such reviews may amount to updating account data in MoneyGuidePro and reviewing quarterly postings to BridgePortfolio, and both displays are available to clients at any time. Where such reviews signal a need for action, the IAR reports to the client involved by email or by regular mail.

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

For all Fountain supervisory accounts, clients receive standard statements from the custodian broker, either electronically or by regular mail. In addition, clients can access at any time their account data, including current values, transaction history, archived statements, and tax documents, directly from the custodian broker website, or MoneyGuidePro and BridgePortfolio.

Applicant: Fountain Strategies, LLC	SEC File Number: 801-	Date: 12/16/2009
---	--------------------------	---------------------

12. Investment or Brokerage Discretion.

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:
- | | | |
|--|--------------------------|-------------------------------------|
| (1) securities to be bought or sold? | Yes | No |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | Yes | No |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (3) broker or dealer to be used? | Yes | No |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (4) commission rates paid? | Yes | No |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

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

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

13. Additional Compensation.

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

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

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

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

- has custody of client funds or securities unless applicant is registered or registering only with the Securities and Exchange Commission; or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? Yes No

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant: Fountain Strategies, LLC	SEC File Number: 801-	Date: 12/16/2009
---	--------------------------	----------------------------

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Fountain Strategies, LLC	IRS Empl. Ident.No.: 02-0562979
--	---

Item of Form (identify)	Answer
ITEM 1.D.	<p>ADVISORY SERVICES AND FEES</p> <p>Fountain Strategies, LLC ("Fountain") is an independent, fee-only investment advisor registered with the State of California. We offer financial planning and investment management advice to professionals, business owners, military officers, corporate executives, and their families. We rely upon careful planning to smooth as much as possible our clients' accumulation, application, and eventual transfer of wealth. First we determine client needs and then we pay attention to them in what we hope will become a lifetime working relationship.</p> <p>Our process starts with an appreciation of a client's threshold for dealing with risk, and then we measure accordingly our suggestions for cash flow, accumulation, insurance, investment, and tax strategies.</p> <p>We rely upon MoneyGuidePro, an online financial planning program, as the platform upon which to integrate our strategies into a working plan. A client can access and challenge his plan at any time, both during the building process and after completion. Client accounts subject to our supervisory advice are generally custodied at Fidelity Investments. Account data are downloaded daily to Fountain's Fidelity access portal and to BridgePortfolio, Inc., where they are available to the client at any time in the form of status and progress reports. BridgePortfolio, Inc. also connects to client accounts in MoneyGuidePro, where client plan investment arrangements and values are up-dated at least quarterly.</p> <p>We sell our time and experience; we do not sell insurance or investment products or a subscription. There is no hourly fee because our annual retainer covers all the attention a client's situation demands, year by year. We charge a one-time, non-refundable set-up fee of \$500. When a prospective client decides we can provide the working relationship he seeks, we seek an annual fixed retainer fee of \$3,000 to \$10,000, payable quarterly in arrears and paid from a client's managed investment accounts. The specific amount of the retainer fee depends upon the complexities anticipated, is mutually agreeable to both IAR and the client, and reflects but may not follow precisely the value of assets under management. Although Fountain believes its advisory fees are competitive, lower fees for similar services may be available at other firms and practitioners.</p> <p>For billing and fees we are guided by terms of our Client Retainer Agreement; for investment services we are guided by terms of our Investment Policy Statement. The Client Retainer Agreement allows a client to resign at any time upon written notice. Since we bill in arrears, there is no occasion for a refund to Fountain of our annual retainer fee.</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: Fountain Strategies, LLC	SEC File Number: 801-	Date: 12/16/2009
---	--------------------------	----------------------------

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Fountain Strategies, LLC	IRS Empl. Ident.No.: 02-0562979
--	---

Item of Form (identify)	Answer
ITEM 4. A. (5)	<p>METHODS OF ANALYSIS We focus on the "risk" aspect of the risk-return equation, and we strive to match a client's risk threshold to the level of volatility (as measured by its Standard Deviation) in his portfolio. Then we want our clients to enjoy whatever advantages are inherent in diversifying investments among a dozen to sixteen asset classes. Our analysis, then, focuses on correlations between various asset classes, and how the volatility of individual asset classes will affect the portfolio as a whole. In most cases we use no-load, index-like, asset class-specific mutual funds offered by Dimension Funds, for which there are several years of risk and return performance statistics readily available.</p>
ITEM 4. C. (7)	<p>INVESTMENT STRATEGIES We do not attempt to beat the market, but rather to incorporate those returns one might anticipate at a level of market risk appropriate to each client's portfolio. We rely upon diversification and asset allocation as investment strategies, and we are attentive to rebalancing among assets of various classes in the portfolio as they drift beyond plus-or-minus 3% from their target percentages in changing markets.</p>
ITEM 5.	<p>EDUCATION AND BUSINESS STANDARDS Fountain's general standards for accepting IAR's include but are not limited to a college degree, designation as a Certified Financial Planner™ certificant, and commitment to our fee-only and passive investment philosophies in the relationship with clients.</p>
ITEM 6.	<p>EDUCATION AND BUSINESS BACKGROUND Fountain's Investment Advisor Representatives are Douglas M. Pease, CFP®, Austin W. Chinn, CFP®, Manorama K. Pai, and Douglas M. Roesser, CFP®. Their educations and business backgrounds are as follows:</p> <p>Douglas MacDonald Pease Year of Birth:1937 Formal Education After High School: Dartmouth College B.A., History 1958 Business Background for Previous Five Years: Fountain Strategies, LLC 01/07 - Present Investment Advisor Representative Maas Capital Advisors, LLC 11/03 - 12/06 Investment Advisor Representative KMS Financial Services, Seattle, WA 01/92 - 12/03 Registered Representative and Advisor Affiliate CERTIFIED FINANCIAL PLANNER™ certificant, 1977 - Present</p> <p>Austin William Chinn</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: Fountain Strategies, LLC	SEC File Number: 801-	Date: 12/16/2009
---	--------------------------	----------------------------

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Fountain Strategies, LLC	IRS Empl. Ident.No.: 02-0562979
--	---

Item of Form (identify)	Answer
ITEM 8. C. (3)	<p>Year of Birth:1943 Formal Education After High School: University of California Santa Cruz - Extension 2004 Certificate, Personal Financial Planning Stanford University, B.A., Psychology 1966 Business Background for Previous Five years Fountain Strategies, LLC 01/07 - Present Investment Advisor Representative Maas Capital Advisors, LLC 02/05 - 12/06 Investment Advisor Representative Self-Employed, San Jose, CA 11/02 - 01/05 CERTIFIED FINANCIAL PLANNER™ certificant, 2007 – Present</p> <p>Manorama K. Pai Year of Birth: 1953 Formal Education After High School: University of California Irvine 2004 Personal Financial Planner Certificate Calicut University, Trichur, India, Home Economics 1974 Business Background for Previous Five Years: Fountain Strategies, LLC 09/07 - Present Investment Advisor Representative Paraplanner with local financial planning group, 01/07 - 09/07 Financial services representative and supervisor at local bank, 1998-2004</p> <p>Douglas M. Roesser, CFP, MSF Year of Birth: 1958 Formal Education After High School Golden Gate University, Masters Science, Finance; 1999 University of Colorado, B.A., Geography; 1981 Business Background for Previous Five Years Fountain Strategies, LLC 12/09 – Present Integris Wealth Management, LLC 04/08 – 12/09 Family Wealth Consulting Group, Inc. 01/00 – 04/08 CERTIFIED FINANCIAL PLANNER™ certificant, 2003 - Present</p> <p>OTHER FINANCIAL INDUSTRY AFFILIATIONS Fountain has signed an agreement with another Registered Investment Advisor to continue legacy services to clients of Fountain’s most recent Investment Advisor Representative. Such services are unique to the other RIA, and supplement those offered by Fountain. There is no cost to either party resulting from this agreement, and the affiliation can be severed upon notice by either party to the agreement.</p> <p>PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS</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: Fountain Strategies, LLC	SEC File Number: 801-	Date: 12/16/2009
---	--------------------------	----------------------------

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Fountain Strategies, LLC	IRS Empl. Ident.No.: 02-0562979
--	---

Item of Form (identify)	Answer
ITEM 9.E.	<p>Fountain Investment Advisor Representatives (IAR's) are paid for their advice and experience, not by or for the investments they might recommend to clients. While Fountain and its IAR's can buy or sell for company and personal accounts the same assets they might recommend to clients, conflicts of interest are not an issue we address beyond the injunction to, "Put the clients' interests first." We have distanced ourselves by policy and by practice from any opportunity beyond our quarterly billing process, for taking any action that might be deemed a discretionary event in our client relationships. The billing process is governed by terms set forth in our Client Retainer Agreement, and our Investment Policy Statement allows trading in a client account only upon the documented request of a client. Fountain and its IAR's do not vote any proxy material arising from client investments. Because our investment analysis and strategies stem from a regard for the market as a whole, there is little if any motive or opportunity for insider trading, which is grounds for severance.</p> <p>Fountain and its IAR's adhere strictly to a Company Code of Ethics, a copy of which is available upon request.</p> <p>A client is under no obligation to act on Fountain's recommendations. Should a client elect to implement Fountain's recommendations, he is under no obligation to do so with Fountain.</p>
ITEM 12. B.	<p>INVESTMENT OR BROKERAGE DISCRETION Fountain does not claim discretion to choose the broker/dealer or commission rates to be paid; clients direct the use of a particular broker/dealer in the Client Retainer Agreement. While Fountain generally requests that its clients direct Fountain to custody their accounts at and to place trades through Fidelity Investments, clients can and do choose other firms for these services. Fountain holds a reasonable belief that the firms it deals with offer best execution and competitive prices, and requires a working relationship between the broker/custodians it deals with and Dimension Funds.</p> <p>In circumstances where Fountain's services do not meet the needs of a client, other advisors or brokers may be recommended.</p> <p>OTHER DISCLOSURES</p> <p>PROXY VOTING As the legal owners of the securities in their accounts, clients are responsible for voting any proxy material related to those securities. Fountain will not vote, nor give advice about how to vote, proxies for securities held in client accounts.</p> <p>CONFIDENTIALITY AND PRIVACY</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: Fountain Strategies, LLC	SEC File Number: 801-	Date: 12/16/2009
---	--------------------------	----------------------------

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Fountain Strategies, LLC	IRS Empl. Ident.No.: 02-0562979
--	---

Item of Form (identify)	Answer
	<p>Regarding privacy, Fountain is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to the firm. Information disclosed to us is treated as confidential and will not be disclosed to any third party unless required by law to do so, or with a client's prior permission. Such permission may be requested to coordinate services on behalf of a client with his attorney, accountant, insurance agent or other professional. Fountain may be required to provide limited information to unaffiliated third parties, such as a custodian broker, necessary to doing the client's business.</p> <p>CONFLICTS OF INTEREST Where an advisor provides clients with both financial planning recommendations and investment management services there is the possibility of a conflict of interest. Fountain believes such a possibility does not exist in its operations because Fountain, as an independent, fee-only advisory firm, does not receive any compensation from third parties. Nevertheless, a client is under no obligation to act on Fountain's recommendations, and should a client elect to implement Fountain's recommendations, he or she is under no obligation to do so with Fountain.</p> <p>BUSINESS CONTINUITY PLAN Fountain recognizes the importance of continuity in our systems and services. Fountain has formulated a Business Continuity Plan ("BCP") outlining actions designed to mitigate the impact of significant business disruptions.</p>

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