

Jonathan D. Pond, LLC

One Gateway Center
300 Washington Street
Suite 413
Newton, MA 02458

Phone: 617-243-0020
Fax: 617-243-0021

www.jonathanpondllc.com

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This disclosure brochure provides clients with information about the qualifications and business practices of Jonathan D. Pond, LLC, an independent investment advisory firm registered with the United States Securities and Exchange Commission ("SEC"). It also describes the services Jonathan D. Pond, LLC provides as well as background information on those individuals who provide investment advisory services on behalf of Jonathan D. Pond, LLC. Please contact Jonathan D. Pond, Managing Member and Chief Compliance Officer of Jonathan D. Pond, LLC, at 617-243-0020 if you have any questions about the contents of this disclosure brochure.

The information in this disclosure brochure has not been approved or verified by the SEC or by any state securities authority. Registration with the SEC does not imply that Jonathan D. Pond, LLC or any individual providing investment advisory services on behalf of Jonathan D. Pond, LLC possess a certain level of skill or training. Additional information about Jonathan D. Pond, LLC is available on the Internet at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Jonathan D. Pond, LLC is 131395.

Table of Contents

ADVISORY BUSINESS	1
Company	
Services	
Assets Under Management	
FEES AND COMPENSATION	2
Portfolio Management Fees	
Financial Planning/Consulting Fees	
Periodical Fees	
Important Additional Information	
PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT	5
TYPES OF CLIENTS	5
Engaging the Services of JDP	
Conditions for Managing Accounts	
METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS	6
Types of Investments	
Investment Strategies	
Security Analysis	
Sources of Information	
Risk	
Cash Management	
DISCIPLINARY INFORMATION	7
OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS	
CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING	7
Our Code of Ethics	
Prohibition on Use of Insider Information	
Participation or Interest in Client Transactions	

Table of Contents

BROKERAGE PRACTICES	8
Brokerage Selection	
Directed Brokerage	
Trade Aggregation/Allocation	
REVIEW OF ACCOUNTS	12
Portfolio Management	
Financial Planning/Consulting	
CLIENT REFERRALS AND OTHER COMPENSATION	12
CUSTODY	12
INVESTMENT DISCRETION	13
VOTING CLIENT SECURITIES	13
Proxy Voting	
Class Actions	
FINANCIAL INFORMATION	14
Payment of Fees	
Financial Condition	
Bankruptcy	
PRIVACY NOTICE	14
COMPLAINTS	14

ADVISORY BUSINESS

Company

Jonathan D. Pond, LLC is a privately-held Massachusetts limited liability company that has been providing investment advisory services since 1987 and has been registered with the SEC since 2008. Throughout this disclosure brochure, the company is referred to as "JDP".

The principal owner of JDP is Jonathan D. Pond.

Services

JDP provides the following investment advisory services:

Portfolio Management Services

Portfolio Management Services includes, among other things, basic financial planning consisting of giving advice regarding asset allocation and the selection of investments. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, JDP develops an investment policy statement for a client and creates and manages a portfolio based on that investment policy. Each portfolio will be designed with the goal of meeting a client's individual needs. Account supervision is guided by the stated objectives of the client.

Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

Financial Planning Services

If a client desires to obtain financial planning services apart from the basic planning services provided as part of Portfolio Management Services, JDP also provides financial planning services as a stand alone service. Advice is rendered in the areas of cash flow and debt management, risk management, college funding, retirement planning, estate planning, tax planning, asset allocation, and investment selection. JDP gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed and a written report is prepared. Should a client choose to implement the recommendations contained in the financial plan, JDP suggests the client work closely with his or her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial planning recommendations is entirely at the client's discretion.

Financial planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All financial planning recommendations are of a generic nature.

In performing its services, JDP shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. If requested by the client, JDP may suggest the services of other professionals for implementation services, but the client is under no obligation to engage the services of any

suggested professional. In addition, each client is advised that it remains their responsibility to promptly notify JDP if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising JDP's previous recommendations and/or services.

Consulting Services

Clients can also receive investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, reviewing a client's existing portfolio, or any other specific topic. JDP also provides services regarding investment and financial concerns of the client.

Periodical Services

Jonathan Pond, Managing Member of JDP, is the author of a weekly email newsletter entitled "Ponderings," which may recommend specific open-end mutual funds and exchange traded funds. Whether such mutual funds and/or exchange traded funds are appropriate for client accounts will depend on the specific needs of individual clients.

Assets Under Management

As of September 30, 2010, the total amount of client assets managed by JDP is approximately \$150,759,360. All client assets are managed on a discretionary basis.

FEES AND COMPENSATION

Portfolio Management Fees

The annual fee for Portfolio Management Services will be charged as a percentage of assets under management according to the following schedule:

Assets Under Management	Maximum Annual Fee (%)
First \$1 million	1.00%
Next \$1 million to \$2 million	0.75%
Next \$3 million to \$5 million	0.50%
Above \$5 million	0.25%

Clients will be billed in arrears at the end of each quarter based upon the market value of the assets in the client's account at the end of that quarter. Market value will be determined by the account custodian. In the event that the account custodian cannot provide a market value for an asset, JDP will determine a fair market value for that asset. If an account is terminated during a quarter, fees will be adjusted pro rata based upon the number of calendar days in the quarter that the agreement was effective.

Details of the portfolio management fee charged are more fully described in the advisory agreement entered into with each client.

Financial Planning and Consulting Fees

Financial Planning and/or Consulting Services fees will be charged in one or both of two ways:

1. As a fixed fee, typically ranging from \$1,500 to \$2,500, depending on the nature and complexity of each client's circumstances.
2. On an hourly basis calculated on a rate ranging from \$100 to \$500 depending on the professional(s) performing the service. The length of time it will take to complete the advisory service will depend on the nature and complexity of the individual client's personal circumstances. An estimate for total hours will be determined at the start of the advisory relationship.

Fees for Financial Planning and/or Consulting Services are due and payable upon completion of the advisory service.

Periodical Fees

The annual subscription fee for the weekly email newsletter is \$49; payable in advance.

Important Additional Information

Fee Only

JDP is compensated solely by fees paid by its clients and does not accept commissions or compensation from any other source (i.e., mutual funds, insurance products or any other investment product).

Fees Negotiable

JDP retains the right to modify fees, including minimum annual fees and minimum account sizes, in its sole and absolute discretion, on a client-by-client basis based on the size, complexity and nature of the advisory services provided.

Direct Debiting of Client Accounts

In order for JDP's advisory fees to be directly debited from a client's account, the client must provide written authorization permitting JDP to bill the custodian. In addition, the account must be held by a qualified custodian and the qualified custodian must agree to send to the client an account statement on at least a quarterly basis. The account statement must indicate all amounts disbursed from the account including the amount of advisory fees paid directly to JDP. Clients are informed that it is their responsibility to verify the accuracy of the fee calculation and that the account custodian will not determine whether the fee is properly calculated.

Termination of Client Relationship

A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. Upon termination of any account, any earned, unpaid fees will be due and payable.

Mutual Fund Fees

All fees paid to JDP for investment advisory services are separate and distinct from the fees and 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 JDP. In that case, the client would not receive the services provided by JDP 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. To the extent that client assets are invested in money market funds or cash positions, the fees for monitoring those assets are in addition to the fees included in the internal expenses of those funds paid to their own investment managers, which are fully disclosed in each fund's prospectus. Accordingly, the client should review both the fees charged by the funds and the fees charged by JDP to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Trading and Other Costs

All fees paid to JDP for investment advisory services are separate and distinct from transaction fees charged by broker dealers associated with the purchase and sale of equity securities and fixed-income securities. In addition, fees do not include the services of any co-fiduciaries, accountants, broker dealers or attorneys. Please see the section entitled "Brokerage Practices" on page 8 of this disclosure brochure for additional information on brokerage and other transaction costs.

Prior Fee Schedules

The fees charged to Portfolio Management Services clients whose assets have been managed by JDP prior to 2011 may differ from the fees charged to new advisory clients of JDP.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

JDP does not accept performance-based fees (e.g., fees based on a share of capital gains on or capital appreciated of the assets in a client's account).

TYPES OF CLIENTS

JDP provides investment advisory services to individuals (including high net worth individuals), pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other types of business entities.

Engaging the Services of JDP

All clients wishing to engage JDP for investment advisory services must first complete the applicable investment advisory agreement as well as any other document or questionnaire

provided by JDP. The investment advisory agreement describes the services and responsibilities of JDP to the client. It also outlines JDP's fee in detail. In addition, clients must complete certain broker-dealer/custodial documentation. Upon completion of these documents, JDP will be considered engaged by the client. Clients will be responsible for ensuring that JDP is informed in a timely manner of changes in investment objectives and risk tolerance.

Conditions for Managing Accounts

Portfolio Management Services

JDP requires new clients have a minimum account of \$500,000 for Portfolio Management Services. JDP may reduce or waive this minimum account size. Accounts of less than \$500,000 may be set up when the client and JDP anticipate the client will add additional funds to the accounts bringing the total to \$500,000 within a reasonable time. Other exceptions will apply to employees of JDP and their relatives, or relatives of existing clients. Economic hardship circumstances may also be taken into consideration. JDP also requires a minimum annual fee of \$5,000. JDP retains the right to reduce or waive the minimum annual fee. Exceptions will apply to employees of JDP and their relatives, or relatives of existing clients. Economic hardship circumstances may also be taken into consideration.

Financial Planning Services

JDP requires a minimum annual fee of \$1,500 for Financial Planning clients. JDP retains the right to reduce or waive the minimum annual fee. Exceptions to the minimum annual fee requirement will apply to employees of JDP and their relatives, or relatives of existing clients. Economic hardship circumstances may also be taken into consideration.

Consulting Services

There is no minimum account size or annual fee requirement for Consulting Services clients.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Types of Investments

Investment advice may be offered on any investments held by a client at the start of the advisory relationship. Recommendations for new investments will typically be limited to domestic and foreign equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal and United States government securities, mutual funds, variable annuities, futures and various limited partnerships investing in real estate and oil and gas.

Investment Strategies

JDP may utilize different investment strategies, based upon the needs of the client, including long-term purchases and short-term purchases.

Security Analysis

The security analysis method employed by JDP is fundamental analysis.

Sources of Information

In conducting security analysis, JDP may utilize the following sources of information: financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the U.S. Securities and Exchange Commission and company press releases. In addition to the listed sources of information, JDP's portfolio manager may, from time to time, conduct interviews of corporate officers, make company visits and participate in analysts' phone conferences.

Risk

Investing in securities involves risk of loss that each client should be prepared to bear. Typical investment risks include market risk typified by a drop in a security's price due to a company specific event (e.g. unsystematic risk), or general market activity (e.g., systematic risk). In addition, certain strategies may impose more risk than others. For example, with fixed income securities, a period of rising interest rates could erode the value of bond since bond values generally fall as bond yields rise. Investment risk with international equities also includes fluctuation in currency values, differences in accounting and economic and political instability. Depending upon the client need and investment mandate, JDP will attempt to thoroughly explain the applicable risks.

Cash Management

JDP will maintain cash balances to meet foreseeable short-term client cash needs, as a temporary repository pending investment in other securities, or as a defensive position when market conditions are considered adverse. High cash balances may be maintained for new clients whose accounts initially consist of high cash positions as cash is gradually invested in equity and fixed income securities.

DISCIPLINARY HISTORY

Neither JDP nor any of its supervised persons have any reportable disciplinary history.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Jonathan D. Pond, Managing Member of JDP, is engaged in developing, supporting and promoting, primarily through public television, five financial products (*Smart Planner*, *Smart Investor*, *Your Investment Road Map*, *Your Lifetime Financial Planner* and *Your Financial Road Map*) that provide financial planning and investment guidance via computer-generated reports based on questionnaire responses. While these products are primarily offered through public television, other distribution outlets may include credit unions, banks, consumer credit counseling agencies, brokerage and mutual fund companies, associations and employers. JDP does not offer or solicit additional products or services in conjunction with the report service, maintains strict confidentiality and regularly purges the names and addresses of questionnaire respondents.

Jonathan D. Pond, Managing Member of JDP, is also the editor of a weekly emailnewsletter covering investment and financial planning topics, the host and executive producer of an annual public television special and a speaker at conferences and corporations.

In the course of these activities, Mr. Pond has been and may in the future be compensated for services directly or through the underwriting of his public television specials, indirectly by investment companies whose mutual funds Mr. Pond might recommend, or by broker-dealers that he recommends to clients.

Mr. Pond may also serve as a paid spokesperson for financial firms or membership organizations. He may recommend that clients independently investigate the products and services of these firms or organizations, but he receives no referral fees or other direct compensation from any client associations with these firms or organizations.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

JDP has adopted a Code of Ethics to prevent violations of federal securities laws. The Code of Ethics is predicated on the principle that JDP and its employees owe a fiduciary duty to its clients. Accordingly, JDP expects all employees to act with honesty, integrity and professionalism and to adhere to federal securities laws. JDP and its employees are required to adhere to the Code of Ethics. At all times, JDP and its employees must (i) place client interests ahead of JDP's; (ii) engage in personal investing that is in full compliance with JDP's Code of Ethics; and (iii) avoid taking advantage of their position. Clients and prospective clients may request a copy of JDP's Code of Ethics by contacting Jonathan D. Pond, Managing Member of JDP, at (617) 243-0020.

Prohibition on Use of Insider Information

JDP has also adopted policies and procedures to prevent the misuse of "insider" information. A copy of JDP's Insider Trading policies and procedures is available to any client or prospective client upon request. For a copy of JDP's Insider Trading policies and procedures, please contact Jonathan D. Pond, Managing Member of JDP, at (617) 243-0020.

Participation or Interest in Client Transactions

JDP or individuals associated with JDP may buy, sell, or hold in their personal accounts the same securities that JDP recommends to its clients. To minimize conflicts of interest, and to maintain the fiduciary responsibility JDP has for its clients, JDP has established the following policy: An officer, manager, or employee of JDP shall not buy or sell securities for a personal portfolio when the decision to purchase is derived by reason of their employment with JDP, unless the information is also available to the investing public as a whole. No person associated with JDP shall prefer his or her own interest to that of any client. Personal trades in securities being purchased or sold for clients may only be made simultaneously with or after trades are made for clients. JDP personnel may not anticipate trades to be placed for clients.

BROKERAGE PRACTICES

Brokerage Selection

Best Execution

Best execution has been defined by the SEC as the “execution of securities transactions for clients in such a manner that the client’s total cost or proceeds in each transaction is the most favorable under the circumstances.” The best execution responsibility applies to the circumstances of each particular transaction and an investment adviser must consider the full range and quality of a broker-dealer’s services, including, among other things, execution capability, commission rates, the value of any research, financial responsibility and responsiveness.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer’s services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while JDP will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

Broker Analysis

JDP evaluates a wide range of criteria in seeking the most favorable price and market for the execution of transactions. These include the broker-dealer’s trading costs, efficiency of execution and error resolution, financial strength and stability, capability, positioning and distribution capabilities, information in regard to the availability of securities, trading patterns, statistical or factual information, opinion pertaining to trading and prior performance in serving JDP.

Also in consideration is such broker-dealers’ provision or payment of the costs of research and other investment management-related services (the provisional payment of such costs by brokers are referred to as payment made by “soft dollars”, as further discussed in the “Research/Soft Dollars Benefits” section immediately below). Accordingly, if JDP determines in good faith that the amount of trading costs charged by a broker-dealer is reasonable in relation to the value of the brokerage and research or investment management-related services provided by such broker, the client may pay trading costs to such broker in an amount greater than the amount another broker might charge.

JDP’s Managing Member is responsible for continuously monitoring and evaluation the performance and execution capabilities of brokers that transact orders for our client accounts to ensure consistent quality executions. In addition, JDP periodically reviews its transaction costs in light of current market circumstances and other relevant information.

Research/Soft Dollar Benefits

JDP utilizes the services of the multiple broker-dealers, including Fidelity Investments Institutional Brokerage Group (“Fidelity”), Charles Schwab & Co., Inc. Institutional Services Group (“Schwab”) and TIAA-CREF. While there is no direct linkage between the investment advice given to clients and JDP’s use of these broker-dealers, economic benefits are received

by JDP (e.g., benefits that JDP does not pay for), which would not otherwise be received if JDP did not direct client trades to these broker-dealers. While JDP is not affiliated with these broker-dealers, they may provide JDP with access to its institutional trading and operations services, which are typically not available to retail investors. These services may include research, brokerage, custody, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

These broker-dealers may also make available to JDP other products and services that benefit JDP, but may not benefit its clients' accounts. Some of these other products and services assist JDP in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of JDP's fees from its clients' accounts, and assist with back-office support, record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of JDP'S accounts, including accounts not maintained at the specific broker-dealer that is offering this particular service. These broker-dealers also provide JDP with other services intended to help JDP manage and further develop its business enterprise. These services may include consulting, publications, conferences and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, these broker-dealers may make available, arrange and/or pay for these types of services to JDP by independent third parties. These broker-dealers may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to JDP.

While as a fiduciary JDP endeavors to act in its clients' best interests, JDP's recommendation that clients maintain their assets in accounts with Fidelity, Schwab or TIAA-CREF may be based in part on the benefit to JDP of the availability of some of the foregoing products and services and not solely on the nature cost or quality of custody and brokerage provided by these broker-dealers which may create a conflict of interest.

Directed Brokerage

JDP Directed Brokerage

JDP does not have the discretionary authority to determine the broker-dealer to be used. As stated above, clients in need of brokerage will have Fidelity Investments Institutional Brokerage Group ("Fidelity"), Charles Schwab & Co., Inc. Institutional Services Group ("Schwab") and/or TIAA-CREF recommended to them. The determination of which broker-dealer to recommend to a client will depend on which broker-dealer offers a range of services that is better for the client.

While there is no direct linkage between the investment advice given and usage of these broker-dealers, economic benefits are received which would not be received if JDP did not give investment advice to clients (please see additional disclosures in the "Research/Soft Dollars Benefits" section directly above). JDP does not participate in any transaction fees or commissions paid to the broker dealer or custodian and does not receive any fees or commissions for the opening or maintenance of client accounts at recommended brokers.

Not all investment advisers require their clients to direct brokerage. JDP is required to disclose that by directing brokerage, JDP may not be able to achieve most favorable execution of client transactions and that this practice may cost clients more money.

Client Directed Brokerage

Certain clients may direct JDP to use particular brokers for executing transactions in their accounts. With regard to client directed brokerage, JDP is required to disclose that JDP may be unable to negotiate commissions, block or batch orders or otherwise achieve the benefits described above, including best execution. Directed brokerage commission rates may be higher than the rates JDP might pay for transactions in non-directed accounts. Therefore, directing brokerage may cost clients more money.

As a general rule, JDP encourages each client to compare the possible costs or disadvantages of directed brokerage against the value of custodial or other services provided by the broker to the client in exchange for the directed brokerage designation.

Trade Aggregation/Allocation

Portfolio Management

It is the objective of JDP to provide a means of allocating trading and investment opportunities between advisory clients on a fair and equitable basis and in compliance with all applicable state and federal guidelines. With respect to clients' accounts with substantially similar investment objectives and policies, JDP may often seek to purchase or sell a particular security in each account. JDP will aggregate orders only when such aggregation is consistent with JDP's duty to seek best execution and is consistent with the investment objective of each client. No client account will be unfairly favored over any other account. Each client that participates in an aggregated order will participate based on the average execution price in that particular security. All transaction costs will be allocated pro rata based on each client's participation in the transaction. All securities purchased or sold, whether the order is filled completely or partially, will then be allocated pro rata based on the assets of each account.

Financial Planning and Consulting

JDP's financial planning practice, due to the nature of its business and client needs, does not include blocking trades, negotiating commissions with broker dealers or obtaining volume discounts, nor necessarily obtaining the best price. Clients will be required to select their own broker dealers and insurance companies for the implementation of financial planning and/or consulting recommendations. JDP may recommend any one of several brokers. JDP clients must independently evaluate these brokers before opening an account. The factors considered by JDP when making this recommendation are set forth above. JDP's financial planning and consulting clients may use any broker or dealer of their choice.

Trade Errors

Trade errors are promptly reported to the custodian and will be rectified by the custodian with no adverse financial effect on the client.

REVIEW OF ACCOUNTS

Portfolio Management Services

Reviews

For those clients to whom JDP provides Portfolio Management Services, account reviews are conducted on an ongoing basis by Jonathan Pond, Managing Member of JDP. All clients are advised that it remains their responsibility to advise JDP of any changes in their investment objectives and/or financial situation. All clients are encouraged to review financial planning issues, investment objectives, and account performance with JDP on an annual basis.

Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the clients' accounts. Those clients to whom JDP provides Portfolio Management Services will also receive a report from JDP summarizing account activity and performance no less than semiannually. Clients are urged to compare the account statement provided by the broker-dealer/custodian with those provided by JDP.

Financial Planning and Consulting Services

These client accounts will be reviewed as contracted for at the inception of the advisory relationship. All client accounts are reviewed by Jonathan Pond, the Managing Member of JDP.

CLIENT REFERRALS AND OTHER COMPENSATION

JDP does not receive any economic benefit from non-clients for the provision of investment advice to its clients nor does JDP retain the services of solicitors.

CUSTODY

JDP is deemed to have custody because JDP deducts its fees directly from client accounts.

Custody of client assets will be maintained with the independent custodian selected by the client. JDP will not have physical custody of any assets in the client's account except as permitted for payment of advisory fees. Clients will be solely responsible for paying all fees or charges of the custodian. Clients will authorize JDP to give the custodian instructions for the purchase, sale, conversion, redemption, exchange or retention of any security, cash or cash equivalent or other investment for the client's account.

Clients will receive directly from the custodian at least quarterly a statement showing all transactions occurring in the client's account during the period covered by the account statement, and the funds, securities and other property in the client's account at the end of the period. Clients are urged to carefully review the account statement sent by the broker-dealer/custodian and to compare the account statement provided by the broker-dealer/custodian with any statements provided by JDP.

INVESTMENT DISCRETION

For those client accounts over which JDP has discretion, JDP requests that it be provided with written authority (e.g., limited power of attorney contained in JDP's Portfolio Management Agreement) to determine the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change or amend these limitations as required. All such amendments shall be submitted in writing. JDP generally has discretionary authority to make the following determinations without obtaining the consent of the client before the transactions are effected: (1) which securities are bought and sold for the account and (2) the total amount of securities to be bought and sold. JDP's authority in making investment related decisions may be limited by account guidelines, investment objectives and trading restrictions, as agreed between JDP and the client.

VOTING CLIENT SECURITIES

Proxy Voting

JDP does not vote proxies on behalf of its clients. Therefore, the client that maintains exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceeding or other type events pertaining to the client's investment assets. JDP and/or the client shall instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. Clients can contact Jonathan Pond, Managing Member of JDP, at (617) 243-0020 if they have questions regarding a particular solicitation.

Class Action Settlements

Although JDP has discretion over client accounts, it will not be responsible for handling client claims in class action lawsuits or similar settlements involving securities owned by the client. Clients will receive the paperwork for such claims directly from their account custodians. Each client should verify with their custodian or other account administrator whether such claims are being made on the client's behalf by the custodian or if the client is expected to file such claims directly.

FINANCIAL INFORMATION

Prepayment of Fees

Because JDP does not require or accept prepayment of more than \$1,200 in fees six months or more in advance, JDP is not required include a balance sheet with this disclosure brochure.

Financial Condition

JDP does not have any adverse financial conditions to disclose.

Bankruptcy

JDP has never been the subject of a bankruptcy petition.

PRIVACY NOTICE

JDP views protecting its clients' private information as a top priority and has instituted policies and procedures to ensure that client information is private and secure. JDP does not disclose any nonpublic personal information about its clients or former clients to any nonaffiliated third parties, except as permitted or required by law. In the course of servicing a client's account, JDP may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers, etc. JDP restricts internal access to nonpublic personal information about the client to those persons who need access to that information in order to provide services to the client and to perform administrative functions for JDP. As emphasized above, it has always been and will always be JDP's policy never to sell information about current or former clients or their accounts to anyone. It is also JDP's policy not to share information unless required to process a transaction, at the request of a client, or as required by law. For the full text of JDP's Privacy Policy, please contact Jonathan Pond, Managing Member of JDP, at (617) 243-0020.

CLIENT COMPLAINTS

Clients may contact Jonathan Pond, Managing Member of JDP, at (617) 243-0020 to submit a complaint. Written complaints should be sent to Jonathan D. Pond, LLC, One Gateway Center, 300 Washington Street, Suite 413, Newton, MA 02458.