

Firm Brochure

(Part 2A of Form ADV)

Pelleton Capital Management, Ltd.

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This brochure provides information about the qualifications and business practices of Pelleton Capital Management, Ltd. If you have any questions about the contents of this brochure, please contact us at: 602-569-6126, or by email at: charles@pelletoncapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Pelleton Capital Management, Ltd. is available on the SEC's website at www.adviserinfo.sec.gov

March 31, 2011

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

We have added custodial arrangements with FolioFN/FolioInstitutional and Jefferson National.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 602-569-6126 or by email at: charles@pellettoncapital.com.

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Advisory Business

Firm Description

Pelleton Capital Management, Ltd. was founded in 1999.

Pelleton Capital Management, Ltd. provides personalized investment management and confidential financial planning to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Pelleton Capital Management, Ltd. is strictly a fee-only investment management and financial planning firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Investment advice is provided, with the client providing discretionary authority to Pelleton Capital Management, Ltd. to make the final decision on investment selection. Pelleton Capital Management, Ltd. does not act as a custodian of client assets. The client always maintains asset control. Pelleton Capital Management, Ltd. places trades for clients under a limited power of attorney.

Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is usually free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Charles C. Scott is a 100% stockholder.

Types of Advisory Services

Pelleton Capital Management, Ltd. provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment

advice through consultations; and may issue, charts, graphs, formulas, or other devices which clients may use to evaluate securities.

On more than an occasional basis, Pelleton Capital Management, Ltd. furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of 12/31/2010, Pelleton Capital Management, Ltd. manages approximately \$ 14,300,000 in assets for approximately 99 clients. Approximately \$ 13,925,000 is managed on a discretionary basis, and \$ 375,000 is managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are typically documented in our client relationship management system. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The fee is \$180 per hour and is potentially negotiable. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary. Follow-on implementation work is billed separately at the rate of \$180 per hour.

Advisory Service Agreement

Most clients choose to have Pelleton Capital Management, Ltd. manage their assets in order to obtain ongoing in-depth advice and planning. All aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning; and tax preparation, as well as the implementation of recommendations within each area.

The Investment Advisor Agreement fee is based on a percentage of the investable assets according to the following:

Investment management fees charged range between 2.50% and 0.25%, based on assets under management. Fees are charged in advance at the end of each quarter and may be pro-rated for partial quarters. Fees are potentially negotiable. Exact fees are specified in the "Schedule of Fees" document which is part of the "Investment Advisor Agreement" signed by each client. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Investment Advisor Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by 30 days written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

www.Real401kAdvice.com is a non-investment advisory marketing service of Pelleton Capital Management, Ltd. whereby Advisor provides advice to 401(k) plan participants on a fee-only basis, giving participating employees specific advice for their 401(k) plan as to which funds to buy, how much to put into each fund, and what to change to as economic conditions change.

Pelleton Capital Management, Ltd. also provides research related services for the purchase of zero coupon municipal bonds for college funds purposes for a

flat fee for. A separate agreement is signed by client specifying the flat fee and is made part of the Investment Advisor Agreement signed by them.

Non-investment advisory service: Pelleton Capital Management, Ltd. also offers to provide pre-divorce planning advice at the rate of \$180-\$240 per hour.

Retainer Agreement

At this time, no retainer agreements are in place for work done on a fixed-fee basis.

Investment Management Agreement

An Investment Advisor Agreement, including a Schedule of Fees, may be executed when financial planning is not provided as part of the relationship.

Tax Preparation

Tax preparation work is not provided by Advisor.

Hourly Planning Engagements

Pelleton Capital Management, Ltd. provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$180.

Asset Management

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Pelleton Capital Management, Ltd. does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through Pelleton Capital Management, Ltd.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying Pelleton Capital Management, Ltd. in writing 30 days in advance and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment,

Pelleton Capital Management, Ltd. will refund any unearned portion of the advance payment.

Pelleton Capital Management, Ltd. may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Pelleton Capital Management, Ltd. will refund any unearned portion of the advance payment.

Fees and Compensation

Description

Pelleton Capital Management, Ltd. bases its fees on a percentage of assets under management, hourly charges, and/or fixed fees.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees are potentially negotiable.

Fee Billing

Investment management fees are billed quarterly, in advance, meaning that we invoice you before the three-month billing period has begun. Fees are deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Pelleton Capital Management, Ltd., in its sole discretion, may charge a lesser or greater investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Investment Advisor Agreements, including the Schedule of Fees, are calculated on an account by account basis and adjusted for complexity of individual situations.

Expense Ratios

Exchange-traded funds and mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Pelleton Capital Management, Ltd. and

Pelleton Capital Management, Ltd. receives none of the fees charged by the funds.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

Pelleton Capital Management, Ltd. reserves the right to stop work on any account that is more than 60 days overdue. In addition, Pelleton Capital Management, Ltd. reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Pelleton Capital Management, Ltd.'s judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

Performance-Based Fees

Sharing of Capital Gains

Pelleton Capital Management, Ltd. does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

Pelleton Capital Management, Ltd. generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

There are no minimum account sizes at this time.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Pelleton Capital Management, Ltd. may use include Dorsey Wright & Associates, Yahoo Finance, Morningstar Principia mutual fund information, Morningstar Principia stock information, TD Ameritrade's research service, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is a relative strength risk-aware methodology. This means that we use passively-managed index and exchange-traded funds as the core investments, and then add a tactical overlay where there are greater opportunities to make a difference. Focusing on risk management is a primary concern. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including but not limited to covered options, uncovered options or spreading strategies).

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

Pelleton Capital Management, Ltd. is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

Affiliations

Pelleton Capital Management, Ltd. has no arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

The employees of Pelleton Capital Management, Ltd. have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Pelleton Capital Management, Ltd. and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades.

Personal Trading

The Chief Compliance Officer of Pelleton Capital Management, Ltd. is Charles C. Scott. He reviews all employee trades each quarter. His trades are reviewed by himself. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small exchange-traded fund trades or small mutual fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

Pelleton Capital Management, Ltd. does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. Pelleton Capital Management, Ltd. recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Pelleton Capital Management, Ltd. recommends discount brokerage firms and trust companies (qualified custodians), such as Shareholders Service Group/Pershing, TDAmeritrade, Jefferson National (for variable annuities), Charles Schwab, FolioFN/FolioInstitutional. Pelleton Capital Management, Ltd. is an advisor with Shareholders Service Group/Pershing Jefferson National, and FolioFN/FolioInstitutional.

Pelleton Capital Management, Ltd. does not receive fees or commissions from any of these arrangements.

Best Execution

Pelleton Capital Management, Ltd. reviews the execution of trades at each custodian regularly. Trading fees charged by the custodians is also reviewed

regularly. Pelleton Capital Management, Ltd. does not receive any portion of the trading fees.

Soft Dollars

Pelleton Capital Management, Ltd. does not participate in any way in the exchange of securities transactions to pay for research or other “soft dollar” benefits. Because of our non-participation in these practices, there are no conflicts of interest.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Account reviews are performed regularly by Charles C. Scott. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Accounts are reviewed quarterly, or more frequently if market, account, or economic conditions merit review. Charles C. Scott, President, performs all reviews for all clients.

Clients receive monthly custodial account statements, quarterly fee statements from Advisor, and quarterly performance reports from custodian (if selected by client and paid for by Advisor).

Client Referrals and Other Compensation

Incoming Referrals

Pelleton Capital Management, Ltd. has been fortunate to receive client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, personal friends and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Pelleton Capital Management, Ltd. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

There is no other form of compensation received by Pelleton Capital Management, Ltd.

Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to any performance report statements provided by Pelleton Capital Management, Ltd.

Net Worth Statements

Net Worth Statements are not currently part of the services provided by Pelleton Capital Management, Ltd.

Investment Discretion

Discretionary Authority for Trading

Pelleton Capital Management, Ltd. accepts discretionary authority to manage securities accounts on behalf of clients. Pelleton Capital Management, Ltd. has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. Pelleton Capital Management, Ltd. does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement your investment strategy.

Limited Power of Attorney

A limited power of attorney is the trading authorization for this purpose. You sign a limited power of attorney included in the custodian's account paperwork so that we may execute the trades on your behalf.

Voting Client Securities

Proxy Votes

Unless the client designates otherwise, Pelleton Capital Management, Ltd. votes proxies for securities over which it maintains discretionary authority consistent with its proxy voting policy. A copy of Pelleton Capital Management, Ltd.'s proxy voting policy is available upon request.

Financial Information

Financial Condition

Pelleton Capital Management, Ltd. does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Pelleton Capital Management, Ltd. does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client, and six months or more in advance.

Business Continuity Plan

General

Pelleton Capital Management, Ltd. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

Pelleton Capital Management, Ltd. has signed a Business Continuation Agreement with another financial advisory firm to support Pelleton Capital Management, Ltd. in the event of Charles Scott's serious disability or death.

Information Security Program

Information Security

Pelleton Capital Management, Ltd. maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

Pelleton Capital Management, Ltd. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

Pelleton Capital Management, Ltd. requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for investment management and financial planning.

Professional Certifications

No employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.

- Successfully pass the Candidate Fitness Standards and background check.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Charles C. Scott

Educational Background:

- Date of birth: November 30, 1948
- University of Washington, Seattle, WA B.A. English Literature, 1972

Business Experience:

5/99 to present Pelleton Capital Management, Ltd. President

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Charles Scott is supervised by himself as President.

SUPERVISOR'S contact information:

602-569-6126 charles@pelletoncapital.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None