

Firm Brochure

(Part 2A of Form ADV)

March 29, 2017

Desert Rose Capital Management, Inc.

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CRD#154331

Part 2A of Form ADV (The “Brochure”) provides information about the qualifications and business practices of Desert Rose Capital Management, Inc. (DCRM). If you have any questions about the contents of this brochure, please contact us at the contact information above. 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.

Desert Rose Capital Management, Inc. is a state registered investment advisor. The use of terms such as “registered or Registered Investment Advisor” does not imply that a certain level of skill or training has been obtained and no inference to the contrary should be made.

Additional information about Desert Rose Capital Management, Inc. is available on the SEC’s website at www.adviserinfo.sec.gov. Our CRD# is 154331.

ITEM 2: MATERIAL CHANGES

The previous version of this Brochure is dated January 7, 2016. We have made the following material changes to this Firm Brochure since that time:

- We have amended ITEM 10 (Other Financial Industry Activities and Affiliations) to include the relationship that Kirk Stafford has with Aspen Life Settlements, a licensed life settlement provider in the State of Idaho.
- We have amended ITEM 14 (Client Referrals & Other Compensation) to disclose that we no longer have any solicitor arrangements.
- We have amended ITEM 19 (Requirements for State Registered Advisers) under Business Experience to include Kirk Stafford's involvement with Aspen Life Settlements.

DRCM encourages you to read this Brochure carefully and to call us with any questions you may have.

DRCM will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of DRCM's fiscal year, along with a copy of this Brochure or an offer to provide the Brochure. Additionally, as DRCM experiences material changes in the future, we will send you a summary of our "Material Changes" under separate cover.

ITEM 3: TABLE OF CONTENTS

<u>Item Number</u>	<u>Item Description</u>	<u>Page Number</u>
1	Cover Page.....	1
2	Material Changes.....	2
3	Table of Contents.....	3
4	Advisory Business.....	3
5	Fees & Compensation.....	4
6	Performance Based Fees & Side-by-Side Management.....	6
7	Types of Clients.....	6
8	Methods of Analysis, Investment Strategies & Risk of Loss.....	6
9	Disciplinary Information.....	6
10	Other Financial Industry Activity & Affiliations.....	6
11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	7
12	Brokerage Practices.....	7
13	Review of Accounts.....	10
14	Client Referrals & Other Compensation.....	10
15	Custody.....	11
16	Investment Discretion.....	11
17	Voting Client Securities.....	11
18	Financial Information.....	12
19	Requirements for State-Registered Advisers.....	12

ITEM 4: OUR ADVISORY BUSINESS

Desert Rose Capital Management, Inc. is a state registered investment advisor. DRCM was established July 19, 2010 by Kirk Alan Stafford, the founder and president. We are not a publicly held company. DRCM is solely owned by Kirk Stafford.

We offer investment advice and asset management services for publicly traded securities. Our core competency is the utilization of exchange traded options in conjunction with conservative income producing assets designed to produce lower overall portfolio risk while participating in potential market appreciation.

While not a primary focus, we may also provide advice on non-security related financial products and services such as life insurance, mortgages, estate planning, retirement plans and savings, budgeting, debt reduction, tax planning and preparation (in conjunction with a CPA), and savings plans for college and mission funds.

We typically manage client accounts under our discretion. We customize our advisory services for you based on your time horizon, risk tolerance, current financial situations, goals and comfort levels. You may impose reasonable restrictions on investing in certain securities or types of securities through written communication to us.

We do not participate in any wrap fee programs.

As of 12/31/2016 we manage \$37,128,582 on a discretionary basis and \$3,505,000 on a non-discretionary basis.

ITEM 5: FEES AND COMPENSATION

Desert Rose Capital Management, Inc. is legally and morally obligated to invest according to the best interests of its clients. We are compensated based on a percentage of the total value of assets we manage for our clients. We retain the right to negotiate the fee schedule. If you would like to negotiate a lower fee at any time, you simply need to propose in writing what and how you would like to pay. We will evaluate your proposal and either accept, modify or decline your proposal. If we modify our fee schedule, we will give you at least thirty (30) days written notice to you. We will not raise fees without written consent from you. For customized portfolios, the fee may vary depending on the services provided.

Your investment management fees are deducted from your advisory account. Unless otherwise agreed upon in advance, fees are charged quarterly, in advance, at the beginning of each quarter based upon the account value at the end of the last day of the previous quarter at the annual rates listed below. The initial fee, which may be for a period of time less than three (3) months, will be based upon the asset value on or about the date that management of the account commences, (the "Commencement Date"). Fees are pro-rated for the period beginning on the Commencement Date through the first three-month billing date, and shall be billed within sixty (60) days after the Commencement Date. Please be sure to read Item 15 as well.

You are required to pay your fees as agreed upon by the executed Investment Advisory Agreement. Generally, agreements require that management fees be paid in advance. You may terminate the agreement by providing us with written notice, and any unearned fees are refunded on a pro-rata basis. We shall be paid through the date of termination. The refund of fees would be determined from the date of termination through the end of the period paid in advance.

Account minimums are \$50,000.00 with a minimum annual fee of \$200. Unless otherwise agreed upon in advance, annual fees charged for assets under management are as follows:

When acting as the sub-advisor for another Registered Investment Advisor: 1% of the first \$5,000,000, 0.75% in excess of \$5,000,000.

When acting as primary investment advisor: 1.5% of the first \$2,000,000, 1.25% in excess of \$2,000,000, 1% in excess of \$5,000,000. In order for us to act as primary investment advisor, you must either be referred from or solicited by another financial professional that coordinates their services with us.

When acting as primary investment advisor for clients that have been brought to us under a solicitor's agreement: 2% of the first \$5,000,000, 1.5% in excess of \$5,000,000.

We enjoy making a difference in the lives of others. As such, we have committed to donate 5% of all management fees to the unaffiliated, federally tax-qualified charities listed below and on our website at www.DesertRoseCapital.com/giving. These charities are:

Perpetual Education Fund <http://pef.lds.org/?locale=eng>

Care for Life <http://www.careforlife.org/>

Latter-Day Saint Charities <http://ldscharities.org/?lang=eng>

Catholic Charities USA

<http://www.catholiccharitiesusa.org/>

Monte Christo Miqlat

<http://www.mcmmiqlat.com/>

In order to encourage additional participation in these charities' worthwhile efforts, we will also match dollar for dollar any fees that you voluntarily pay over and above your contractual amount, up to an additional 5% of the contractual amount.

Example: Your normal fee is 1.00%. You choose to pay .15% per year more for a total yearly amount of 1.15%. Out of the fees you have paid, we will donate our normal .05% plus the extra .15% you have paid *and* a matching donation from us of .05% (maximum matching amount) for a total contribution of .25%.

While this may seem like a small amount, we believe these charities will be able to put the funds to good use and magnify your efforts and ours to benefit the lives of many people.

Lower fees for comparable services may be available from other sources.

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by you. In addition to our fees, you may incur certain charges imposed by custodians, brokers, third party investment managers and other third parties such as custodial fees, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in each fund's prospectus.

These charges, fees and commissions are exclusive of and in addition to our fees, and we shall not receive any portion of such commissions, costs and fees. In the case of investment advisory consulting services provided by us, we shall be reimbursed for certain expenses to the extent you require higher service levels.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

We stand behind our investment management abilities, strategies and services. If you are dissatisfied with our services for any reason, you may notify us in writing 10 business days before or after the latest billing and we will give you a full refund for that billing.

We do not accept compensation for the sale of any security. We employ licensed insurance agents and may recommend insurance products and securities to help fulfill your financial needs. We may recommend various insurance companies and insurance products when making recommendations. We may be compensated by these companies when their products are sold. The sales-based commission compensation received by our employees is separate from and in addition to the investment advisory fees you will pay.

This presents a conflict of interest and gives us and our supervised persons an incentive to recommend investment products based on the compensation received, rather than on your needs. We are however, obligated both morally and legally to place your interests first. We will make recommendations that are in your best interest, regardless of how or if we are compensated. We will notify you when we are discussing commission based insurance products and how they would compare with a fee based alternative.

You have the option to purchase insurance products that we recommend from other agents that are not affiliated with us.

Commissions are not a primary source of revenue.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not accept performance-based fees.

ITEM 7: TYPES OF CLIENTS

We provide investment advice to individuals, including high-net-worth individuals, profit sharing plans, trusts, estates, and corporations or other businesses not already listed. We act as the sub-advisor to unaffiliated advisors. We may provide investment advice to banking or thrift institutions, investment companies (including mutual funds), pension plans, charitable organizations, and state or municipal government entities. The minimum amount required to open an account is \$50,000, which may be waived if agreed upon in advance, at our discretion.

ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

We primarily use a fundamental analysis of capital markets and asset allocation as the basis for our investment advice and the management of assets. We then use our experience and knowledge of exchange traded options to help mitigate the risks of owning stocks and bonds and to potentially increase their performance. We typically do this by buying long term call options on an equivalent number of the same underlying shares. We then use the remaining amount of what would have been used to buy the shares directly to invest in what we believe to be more conservative assets. These assets are used with the intent to mitigate risk and offset the costs of the options that were purchased on the underlying shares. Other option strategies are also employed using a small percentage of the portfolio with the intent to offset the costs of purchasing the call options. Proprietary algorithms and software are used to optimize what we feel are the most appropriate options for current stock market and option market conditions, transitioning and adjusting the portfolio as we feel appropriate and necessary,

Investing involves risk. There are unique risks associated with exchange traded options that should be understood before investing. Liquidity risks, more frequent transaction costs, fluctuations in price due to volatility, interest rates, currency exchange rates, etc. can all be factors that increase the risk that you will lose investment capital. We take these risks very seriously and take great care to try to reduce these risks, but you must be willing and able to bear the risk of a possible loss of capital.

Neither DRCM, nor any other portfolio manager or group of managers, regardless of their experience, training, education, system, selection program or model can predict the future with consistent accuracy.

ITEM 9: DISCIPLINARY INFORMATION

Neither the firm, its owners, nor any management person, has been involved in any criminal or civil disciplinary action by any court or had an administrative proceeding before the SEC or any regulatory agency.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We have not, and do not plan to register with or as a broker/dealer.

We have not, and do not plan to register as a futures commission merchant, commodity pool operator, a commodity trading adviser or an associated person of the foregoing entities.

We employ licensed insurance agents and may recommend insurance products to help fulfill the financial needs of our clients. We may utilize various insurance companies when making these recommendations and we may be compensated by these companies when their products are sold. This presents a conflict of interest. However, as a registered investment adviser, we are not only ethically, but legally bound to make these recommendations only when it is in your best interest.

Kirk Stafford owns The Stafford Corporation, which transacts life insurance business and does business as Aspen Life Settlements, a licensed life settlement provider in the State of Idaho. While it is not expected that Aspen will purchase any insurance policies from clients, it would present a conflict of interest if it did. Any transactions involving clients would require the client to seek outside advice and/or counsel before completing any transaction.

We are employed as a sub-advisor for unaffiliated registered investment advisors. This creates a conflict of interest, creating an incentive for us to value clients that do not use an unaffiliated advisor more. We mitigate this conflict by managing all accounts with the same proprietary software that does not distinguish between client origin or fee percentage. Also, we honor the fiduciary responsibility we have by doing what is in our client's best interest first.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

We abide by a written Code of Ethics that establishes ideals for ethical conduct based upon fundamental principles of integrity, honesty, and transparency. We will provide a copy of our Code of Ethics to you upon request.

We do not recommend that clients buy or sell securities in which we have a material financial interest.

We may own the same securities that we recommend to clients. This creates a conflict of interest. However, we believe this will not have any material effect because the securities used are widely held, publicly traded and our limited participation will not adversely affect the market.

We will not buy or sell the same day in front of client purchases or sales.

ITEM 12: BROKERAGE PRACTICES

Clients wishing to implement our advice may select any custodian they wish, and are so informed. Those wishing for us to recommend a custodian will get a recommendation based on the advisor/custodian's costs, skills, reputation, dependability and compatibility with you. You may be able to obtain reduced commissions and fees from other advisors/custodians.

We do not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item

15 - Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use a registered broker-dealer, Member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with any qualified custodian (Custodian). The Custodian will hold your assets in a brokerage account and buy and sell securities when we give them instructions. While we recommend that you use a particular Custodian, you will decide whether to do so and will open your account with the Custodian by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with a Custodian that we can work with, then we cannot manage your account.

How We Select Brokers and Custodians

We seek to recommend a Custodian who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.)
- Availability of investment research and tools that help us make investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us

Your Brokerage and Custody Costs

For our clients’ accounts that the Custodian maintains, the Custodian generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Broker account. The Custodian’s commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a minimum amount of assets in accounts at the Custodian. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. We have determined that having the Custodian execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How We Select Brokers/Custodians”).

Products and Services Available to Us from the Custodian

The Custodian’s business is serving independent investment advisory firms like us. They provide us with access to its institutional brokerage–trading, custody, reporting, and related services—many of which are not typically available to the Custodian’s retail customers. The Custodian also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. The Custodian’s support services generally are available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as our clients collectively maintain a minimum amount of their assets in accounts at the Custodian.

Services That Benefit You

The Custodian’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through the Custodian include some to which we might not otherwise have

access or that would require a significantly higher minimum initial investment by our clients. The Custodian's services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You

The Custodian also makes available to us other "soft-dollar" products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both the Custodian's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at the Custodian. In addition to investment research, the Custodian also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us

The Custodian also offers other "soft-dollar" services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

The Custodian may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. The Custodian may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. The Custodian may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Custodian's Services

The availability of these "soft-dollar" services from the Custodian benefits us because we do not have to produce or purchase them. We don't have to pay for the Custodian's services so long as our clients collectively keep a minimum amount their assets in accounts at the Custodian. Beyond that, these services are not contingent upon us committing any specific amount of business to Broker in trading commissions or assets in custody. The Custodian's requirement that our clients maintain a minimum amount of assets with them gives us an incentive to recommend that you maintain your account with the Custodian, based on our interest in receiving the Custodian's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We will act according to our fiduciary responsibility in our recommendation of a custodian and broker that is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Broker's services and not Broker's services that benefit only us. Some of the products or services provided by the Custodian do not qualify for the safe harbor in section 28(e) of the Securities Exchange Act of 1934, including those services that do not aid in investment decision-making or trade execution. These business management and development services, in addition to those listed above, may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the Custodian may use independent third parties to offer these services to us. We may cause clients to pay commissions that are higher than those that another qualified broker-dealer might charge to effect the same transaction where we determine that the commission is reasonable in relation to the value of the brokerage and research services received.

We do not allow client-directed brokerage.

We do not receive any referrals from the custodians that we use.

Transactions for each client will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We perform investment management services for various clients, some of which may have similar investment objectives. We may aggregate sale and purchase orders with other client accounts and proprietary (employee) accounts that have similar orders being made at the same time, if in our judgment such aggregation is reasonably likely to result in an overall economic benefit to the affected accounts. Such benefits may include better transaction prices and lower trade execution costs. We may (but are not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among our clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. If all aggregate orders do not fill at the same price, transactions will generally be averaged as to price and allocated among participating accounts pro rata to the purchase and sale orders placed for each participating account on any given day. If such orders cannot be fully executed under prevailing market conditions, we may allocate the securities traded among participating accounts and each similar order in a manner which we consider equitable, taking into consideration, among other things, the size of the orders placed, the relative cash positions of each account, the investment objectives of the accounts, and liquidity of the security. We may remove small allocations from the process if we believe it would not be in the best interest of our client(s).

ITEM 13: REVIEW OF ACCOUNTS

Periodic review of asset management accounts are monitored on an ongoing basis, our President and Portfolio Manager undertakes reviews of client accounts not less than bi-weekly. Accounts are reviewed for consistency with the investment strategy and other parameters set forth for the account and to determine if any adjustments need to be made.

Other reviews may be triggered by changes in an account holder's personal, tax or financial status. Other events that may trigger a review of an account are material changes in market conditions as well as macroeconomic and company-specific events. You are encouraged to notify us and our advisory representatives of any changes in your personal financial situation that might affect your investment needs, objectives, or time horizon.

We do not prepare regular reports for our clients. However, reports are made available from the custodian(s) such as (example: TD Ameritrade, Scottrade, Schwab, etc.). These account statements describe all activity in your accounts including account holdings, transactions, and investment advisory fees deducted from the account. The current status of your accounts is available at any time from the custodian's website.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

We are not compensated by anyone for our investment advice to you. We may compensate licensed entities and/or individuals for referrals. We have entered into written arrangements where we will pay individuals or entities not associated with us for successful referrals of new clients. The money paid to these other individuals or entities is a percentage of the investment advisory fees that the new client pays us. Because these non-associated individuals or entities receive payment for successful referrals, a conflict of interest exists between prospective clients and the referrer. The compensation arrangement between us and the referrer is disclosed to prospective clients before they enter into investment advisory relationships with us. The compensated person will be properly registered as a solicitor and follows CCR 260.236(c)(2) requirements. We currently have no firms that solicit business on our behalf.

By using a solicitor, you may pay a higher fee than those that engage us without a referral.

ITEM 15: CUSTODY

We are deemed to have custody of client funds because the firm has the written authority and ability to deduct its fees directly from clients' accounts. To mitigate any conflicts of interests, all our client account assets are maintained with an independent qualified custodian. Generally, we recommend TD Ameritrade or Charles Schwab for custodial services, but from time to time, other custodians may be used by us to custody assets.

In most cases a client's broker-dealer also may act as the custodian of the client's assets for little or no extra cost. You should be aware, however, of the differences between having your assets held at a broker-dealer versus at a bank or trust company. Some of these differences include, but are not limited to, custodian costs, trading issues, security of assets, client reporting and technology.

We may only implement our investment management recommendations after you have arranged for and furnished us with all information and authorization regarding your accounts held at the designated, qualified custodian.

You will receive statements on at least a quarterly basis directly from the qualified custodian that holds and maintains your assets. You will also receive an invoice detailing how your fees were calculated by us on a quarterly basis. You are urged to carefully review all statements and fees charged from us and the custodian for accuracy and completeness.

ITEM 16: INVESTMENT DISCRETION

All Asset Management Services are performed by us on a discretionary basis, unless otherwise agreed upon at the inception of our relationship and memorialized in your advisory agreement. In exercising our discretionary authority, we have the ability to determine the type and amount of securities to be transacted and whether your purchase or sale should be combined (aggregated) with those of other clients and traded as a "block." Such discretion is to be exercised in a manner consistent with each client's stated investment objectives, risk tolerance, and time horizon. In addition, our authority to trade securities may be limited in certain circumstances by applicable legal and regulatory requirements. You are permitted to impose reasonable limitations on our discretionary authority, including restrictions on investing in certain securities or types of securities. All such limitations, restrictions, and investment guidelines must be provided to us in writing.

Unless you specifically request in writing that we manage all or part of your account on a non-discretionary basis, when signing our advisory agreement, you authorize us to exercise full discretionary authority with respect to all investment transactions involving your account. Pursuant to such agreement, we are designated as your attorney-in-fact with discretionary authority to effect investment transactions in your accounts which authorizes us to give instructions to third parties in furtherance of such authority.

ITEM 17: VOTING CLIENT SECURITIES

We do not have, nor do we accept the authority to vote client securities. Clients receive their proxies and other solicitations directly from their custodian. You may contact us with any questions regarding this matter.

ITEM 18: FINANCIAL INFORMATION

We are not aware of any circumstance that is reasonably likely to impair our ability to meet contractual commitments to you or our other clients. We do not require pre-payment of investment advisory fees of greater than \$500 and more than six months in advance. Neither DRCM nor any employee or affiliate has ever been the subject of a bankruptcy petition.

ITEM 19: REQUIREMENTS FOR STATE REGISTERED ADVISERS

A. Educational Background

No formal education after high school.

Business Experience

July 2010 - Present Founder, CEO and Portfolio Manager, Desert Rose Capital Management, Inc., Boise, Idaho

Kirk's desire to see the widespread implementation of the Integrated Options Portfolio (IOP) compelled him to incorporate DRCM in July, 2010.

1996 - Present Founder, CEO, The Stafford Corporation DBA Aspen Life Settlements, Meridian, Idaho

Kirk's business acumen was sharpened as he established and developed this flooring contractor business into a dominant regional force with labor revenues of a million dollars a year. His knowledge of taxes, business needs and concerns, employees and business metrics were all refined. His passion for exchange traded options began in 1996 and this business allowed him ample time to study, understand and trade options in his personal accounts. This business, combined with successful real estate and investments allowed Kirk to retire from all operational duties at 33 years old. His retirement years were more filled with his passion for investing than golf or other typical retirement activities, so Kirk decided to use his passion and talents professionally in the fall of 2007. The operations of The Stafford Corporation were sold in 2011 and this is now the entity used for Kirk's insurance business. This entity also began operating as a licensed life settlement provider in the State of Idaho in November of 2016 under the name Aspen Life Settlements.

2008 - 2010 Investment Advisor Representative, Registered Representative, MML Investor Services, Inc., Boise, Idaho

Kirk's knowledge and application of investing and financial planning in all areas of financial planning for individuals and businesses are deepened and refined. This is when, in 2008, the Integrated Options Portfolio (IOP) concept began to develop.

1995 - 1997 Consultant, Idaho Dept. of Labor, Payette, Idaho

Kirk worked primarily in the Unemployment Insurance Division with heavy use and application of state and federal unemployment insurance laws, eventually even adjudicating claims and making eligibility determinations. His experiences

with the unemployed and their challenges as well as his knowledge of overall economic issues and policies were broadened.

1994 - 1995 Mortgage Loan Officer, Rocky Mountain Mortgage, Nampa, Idaho

Deep knowledge of interest rates, lending and personal finances were developed.

1991 - 1993 Missionary, Church of Jesus Christ of Latter-Day Saints, Guatemala

Kirk's interest and knowledge of investing received from his grandfather gained deep roots in their application and importance to the human condition as he served and lived with the people of Guatemala. He is fluent in Spanish and learned the basics of the Mayan dialect Kaqchiquel. This is also where the foundation of our charitable contributions program began.

Kirk Stafford may spend as much as one hour per month selling insurance products to help fulfill the financial needs of our clients. See Item 5 (f) and Item 10 (c).

We do not charge performance based fees.

Neither the firm, nor any management person, has been involved in any of the events listed below:

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.00, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

We do not have any relationship or arrangement with any issuer of securities and provide our assurance that all material conflicts of interest under CCR Section 260.238 (k) are disclosed regarding us, our representatives or any of our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

We sincerely hope that you enjoy your experience with us and look forward to many years together. Any questions not addressed or that may need further clarification can be clarified by contacting us by phone or through an email located on the cover page.