

FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

OMB APPROVAL

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Name of Investment Adviser: Pete Mitchell, Inc.						
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:
	12792 Valley View Ste. 202b	Garden Grove	CA	92845	714-657-3559	

This part of FORM ADV gives information about the investment adviser and its business for the use of clients. The information has not been approved or verified by any government authority.

Table of Contents

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

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

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

1. A. Advisory Services and Fees. (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

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

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

- B. Does applicant call any of the services it checked above financial planning or some similar term? Yes No

C. Applicant offers investment advisory services for: (check all that apply)

- (1) A percentage of assets under management (4) Subscription fees
- (2) Hourly charges (5) Commissions
- (3) Fixed fees (not including subscription fees) (6) Other

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

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

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

- A. Individuals E. Trusts, estates, or charitable organizations
- B. Banks or thrift institutions F. Corporations or business entities other than those listed above
- C. Investment companies G. Other (describe on Schedule F)
- D. Pension and profit sharing plans

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

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|---|---|
| <input checked="" type="checkbox"/> A. Equity securities
<input checked="" type="checkbox"/> (1) exchange-listed securities
<input checked="" type="checkbox"/> (2) securities traded over-the-counter
<input checked="" type="checkbox"/> (3) Foreign issuers | <input checked="" type="checkbox"/> H. United States government securities |
| <input type="checkbox"/> B. Warrants | <input type="checkbox"/> I. Options contracts on:
<input type="checkbox"/> (1) securities
<input type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> J. Futures contracts on:
<input type="checkbox"/> (1) tangibles
<input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> D. Commercial paper | <input type="checkbox"/> K. Interests in partnerships investing in:
<input type="checkbox"/> (1) real estate
<input type="checkbox"/> (2) oil and gas interests
<input type="checkbox"/> (3) other (explain on Schedule F) |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> F. Municipal securities | |
| <input checked="" type="checkbox"/> G. Investment company securities:
<input checked="" type="checkbox"/> (1) variable life insurance
<input checked="" type="checkbox"/> (2) variable annuities
<input checked="" type="checkbox"/> (3) mutual fund shares | |

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

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

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Charting | (4) <input checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input checked="" type="checkbox"/> Timing services |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the
Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input type="checkbox"/> Company press releases |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Applicant: Pete Mitchell, Inc.

SEC File Number:
801-

Date:
10/15/2008

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No

(If yes, please describe these standards on Schedule F)

6. Education and Business Background.

For:

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

On Schedule F, give the:

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

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

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

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

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

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
 - (1) broker-dealer
 - (2) investment company
 - (3) other investment adviser
 - (4) financial planning firm
 - (5) commodity pool operator, commodity trading adviser or futures commission merchant
 - (6) banking or thrift institution
 - (7) accounting firm
 - (8) law firm
 - (9) insurance company or agency
 - (10) pension consultant
 - (11) real estate broker or dealer
 - (12) entity that creates or packages limited partnerships

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

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

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

Applicant: Pete Mitchell, Inc.

SEC File Number:
801-

Date:
10/15/2008

9. Participation or Interest in Client Transactions.

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

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

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

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

- 10. Conditions for Managing Accounts.** Does the applicant provide investment advisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other condition for starting or maintaining an account?

Yes No

(If yes, describe on Schedule F)

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

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

Investment Advisory Services: The securities in every client's account will be under continuous review. Client accounts will typically be reviewed quarterly. Accounts will be reviewed by Pete Mitchell, Inc.'s President. Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations.

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

Investment Advisory Services: Each client will receive a monthly report detailing the client's account performance from the Custodian. Financial planning clients may arrange for additional reports for a separate fee.

Applicant: Pete Mitchell, Inc.	SEC File Number: 801-	Date: 10/15/2008
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12. Investment or Brokerage Discretion.

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

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

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

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

13. Additional Compensation.

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

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

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

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

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

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant: Pete Mitchell, Inc.	SEC File Number: 801-	Date: 10/15/2008
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
Item 1.D	<p>The applicant, Pete Mitchell, Inc. (hereinafter "PMI"), offers the following services to clients.</p> <p>FINANCIAL PLANNING:</p> <p>PMI shall provide the planning services described below:</p> <p>Prepare a financial plan, furnish recommendations as to allocation of assets including investments, savings, and insurances, and prepare a plan to assist the client in defining personal financial planning goals for retirement, estate planning, children's education, business planning, budgeting and investments.</p> <p>The compensation of PMI for its financial planning services shall be based on an hourly fee of \$200.00 per hour billed in completed 15 minute increments or a flat fee ranging from \$500.00 to \$5,000.00 per project based on the complexity of the project. If a flat fee applies, half of the fee may be due upon signing the Financial Planning Agreement, and the balance upon delivery of the written financial plan. The client has five business days to cancel the contract for a full refund. All fees are negotiable. If the plan under the Financial Planning Agreement is implemented with the advisor, certain fees may be waived.</p> <p>The client is under no obligation to implement or act upon the recommendations of the financial plan or recommendations of the adviser. If the client elects to implement the recommendations of the financial plan, the client is under no obligation to effect the transactions through the adviser.</p> <p>The contract may be terminated at any time by either party's giving to the other written notice of such termination. Applicant will not accept any termination instructions, including liquidation instructions, unless provided for in writing by the client. The client shall have the option to terminate the contract in its entirety without penalty for five business days. If any fees are paid in advance, the client shall receive a pro rata refund.</p> <p>Subsection (j) of Rule 260.238, California Code of Regulations requires all investment advisers to disclose to their investment advisory clients that lower fees for comparable services may be available from other sources.</p> <p>The principal of PMI recommends and sells insurance products including but not limited to Life, Health, Disability, Long Term Care, and Annuities.</p> <p>Pursuant to California Rule 206.235.2, a conflict will exist between the interests of PMI or associated person and the interests of the client. This statement is required of any investment adviser that provides financial planning services to California residents.</p>

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

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant: Pete Mitchell, Inc.	SEC File Number: 801-	Date: 10/15/2008
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer										
Item 1.D Cont'd.	<p>INVESTMENT MANAGEMENT SERVICES</p> <p>PMI manages investment portfolios for individuals. PMI will work with clients to determine the client's investment objectives and risk profiles and will design a written investment policy statement.</p> <p>PMI uses investment and portfolio allocations based on charting, fundamental, and technical analysis to evaluate alternative portfolio designs. PMI evaluates the client's existing investments with respect to the client's investment policy statement. PMI works with new clients to develop a plan to transition from the client's existing portfolio to the desired portfolio. PMI will then continuously monitor the client's portfolio holdings and the overall asset allocation strategy and hold regular review meetings with the client regarding the account as necessary.</p> <p>PMI will typically create a portfolio of securities and insurance products. PMI will allocate the client's assets among various instruments taking into consideration the overall management style selected by the client. PMI manages mutual fund and equity portfolios on a non-discretionary basis.</p> <p>PMI may also recommend fixed income securities to advisory clients.</p> <p>The annual fee for investment management services will be charged as a percentage of assets under management, according to the schedule below:</p> <table border="0"> <thead> <tr> <th>Assets under management</th> <th>Maximum Annual Fee (%)</th> </tr> </thead> <tbody> <tr> <td>Up to \$50,000</td> <td>2.50%</td> </tr> <tr> <td>\$50,001 to \$150,000</td> <td>2.00%</td> </tr> <tr> <td>\$150,001 to \$250,000</td> <td>1.75%</td> </tr> <tr> <td>\$250,001 or more</td> <td>1.55%</td> </tr> </tbody> </table> <p>All trades will be cleared through the Custodian. In addition to the account fee, the client may be charged transaction charges pursuant to a fixed schedule for trade execution. These transaction charges are paid to the Custodian. The transaction charges represent the only payment to the custodian for brokerage services and will be described in detail in Exhibit A of Client Services Agreement provided to each client. If the account is opened with securities previously purchased through PMI, PMI may have already received commissions on the purchase. If the account is opened with cash proceeds from the sale of securities through PMI, PMI may have already received commissions on the sale.</p> <p>Clients should be aware that they may incur other fees to unaffiliated third parties such as retirement plan administration fees, deferred sales charges on mutual funds initially deposited in the account and 12(b)1 fees and other mutual fund annual expenses described herein.</p>	Assets under management	Maximum Annual Fee (%)	Up to \$50,000	2.50%	\$50,001 to \$150,000	2.00%	\$150,001 to \$250,000	1.75%	\$250,001 or more	1.55%
Assets under management	Maximum Annual Fee (%)										
Up to \$50,000	2.50%										
\$50,001 to \$150,000	2.00%										
\$150,001 to \$250,000	1.75%										
\$250,001 or more	1.55%										

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

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant: Pete Mitchell, Inc.	SEC File Number: 801-	Date: 10/15/2008
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
Item 1.D Cont'd.	<p>Subsection (j) of Rule 260.238, California Code of Regulations requires all investment advisers to disclose to their investment advisory clients that lower fees for comparable services may be available from other sources.</p> <p>GENERAL INFORMATION ON SERVICES, FEES AND TERMINATION</p> <p>Fees are charged quarterly, in advance, directly from customer accounts. One-quarter of the annual fee times the value of the client's portfolio on the 1st day of each quarter will determine the fees charged. Fees are negotiable, based on a client's specific situation and need.</p> <p>Individual accounts for members of the same family, defined as spouses and dependent children are assessed fees based on the total account balance of all family accounts. All related businesses of family are included in this formula.</p> <p>The client shall have the option to cancel any agreement, including the Financial Planning Agreement or Client Investment Agreement with thirty (30) days written notice. Refunds will be prorated back to clients for quarters that have been prepaid, on a basis of total calendar days in a quarter and total calendar days remaining at termination. Clients may terminate their accounts without penalty, for full refund, within 5 days of signing the contract. Termination of any agreement does not affect liabilities or obligations incurred or arising from transactions initiated under the agreement before such termination was given. Upon termination, it is the client's responsibility to monitor his or her assets and PMI has no further obligations to act or advise to those assets.</p> <p>PMI, may, at its discretion, require a 4 year College Degree and/or 3 years experience in the financial services industry.</p> <p>EDUCATION AND BUSINESS BACKGROUND</p> <p>Name: Peter Dean Ford Mitchell Year of birth: 1975</p> <p>Education: Biola University, Communications, 2003</p> <p>Business Background: 01/2005 to Present - Self Employed (Consultant for University For Loan Officers) 10/2004 to 01/2005 - Registered Representative; Countrywide Investment Services 04/2002 to 10/2004 - Registered Representative; World Group Securities 05/2000 to 04/2002 - WMA Securities</p>

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

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant: Pete Mitchell, Inc.	SEC File Number: 801-	Date: 10/15/2008
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
Item 7.B&C	The principal of PMI is an insurance agent of various insurance companies. In such capacities, the principal may receive normal commissions and/or other compensation. The sale of these products accounts for approximately 30 to 60% of the principal's time.
Item 8.C.9	<p>OTHER AFFILIATIONS</p> <p>The principal of PMI will be selling insurance products to the clients of the Investment Adviser. He will receive commissions from the insurance company(ies) that will fall in the following ranges for insurance products.</p> <p>Clients should know that any commissionable product could create a conflict of interest, as the adviser is being paid by a third party. The commission ranges are as follow:</p> <p>Fixed Annuities: 0% - 15% Cash Value Life insurance: 0% - 130% of target premium and/or 0% - 3% on excess of target premium Term life insurance: 0% - 130% of first year premium. Health Insurance: 0% - 16%</p>
Item 9 & 9.E	<p>At times the interests of PMI or its principal's account may coincide with the interests of client's accounts, however, at no time will PMI or its principal receive an added benefit or advantage over clients with respect to these transactions. PMI and its principal will maintain personal transaction records. PMI will not permit insider trading.</p> <p><u>PRIVACY STATEMENT</u></p> <p>PMI is committed to safeguarding the confidential information of its clients and holds all personal information provided to it in the strictest confidence. These records include all personal information that PMI collects from its clients or receives from other firms in connection with any of the financial services PMI provides. PMI also requires other firms with whom it deals to restrict the use of client's information. PMI's Privacy Policy is available upon client's engagement of PMI's services or by prior request of the clients.</p> <p><u>CODE OF ETHICS</u></p> <p>PMI may buy or sell securities identical to those recommended to its customers for its personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to clients.</p>

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

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant: Pete Mitchell, Inc.	SEC File Number: 801-	Date: 10/15/2008
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
Item 9&9.E Cont'd.	<p>It is the expressed policy of PMI that it may not purchase or sell any individual stock or bond prior to a transaction(s) being implemented for an advisory account, and therefore, preventing it from benefiting as a result of transactions placed on behalf of advisory accounts.</p> <p>As these situations represent a conflict of interest, PMI has established the following restrictions in order to ensure its fiduciary responsibilities to clients are met:</p> <ol style="list-style-type: none"> 1) PMI shall not buy or sell securities for its personal portfolio(s) where its decision is substantially derived, in whole or in part, by its role as an PMI unless the information is also available to the investing public on reasonable inquiry. In no case, shall PMI prefer its own interest to that of its advisory clients. (1) (2) 2) All clients are fully informed that PMI and/or its IARs may receive separate compensation when effecting transactions during the implementation process. 3) PMI emphasizes the unrestricted right of its clients to decline to implement any advice rendered, except in situations where a Third Party Advisory Service is granted discretionary authority in the client's account. 4) PMI recognizes it must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. <p>Footnotes</p> <p>(1) This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of PMIs' client's trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with PMI's records in the manner set forth above.</p> <p>(2) Open-end mutual funds and/or the investment sub-accounts which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds and/or variable insurance products by PMI are not likely to have an impact on the prices of the fund shares in which clients invest, and are therefore not prohibited by PMI's Investment policies and procedures.</p> <p>In accordance with Section 204A of the Investment Act of 1940, PMI also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by PMI.</p>

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

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant: Pete Mitchell, Inc.	SEC File Number: 801-	Date: 10/15/2008
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 9&9.E Cont'd.	<p>PMI has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Political and Charitable Contributions, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Personal Securities Transactions, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.</p> <p>THE CLIENT HAS A RIGHT TO SEE OUR CODE OF ETHICS. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK YOUR FINANCIAL ADVISOR AT ANY TIME.</p> <p>PMI does not vote proxies for Clients</p>	
Item 12.B	<p>PMI will require clients to open a brokerage account with TradePMR, to act as custodians for client funds and securities. TradePMR was chosen due to their relatively low transaction fees to the client. PMI will never charge a premium or commission on transactions, beyond the actual cost imposed by TradePMR. Every attempt will be made to get group discounts on transactions when possible.</p>	
Item 13.A	<p>PMI may, at its discretion, directly or indirectly compensates third parties for client referrals. In their capacity those persons may act as a solicitor and refer clients to PMI. Full disclosure will be provided at the time of solicitation pursuant to and in accordance with all State and Federal regulations including Rule 206(4)-3 of the Investment Advisers Act of 1940. Full disclosure will be made prior to such a sale including the nature of the relationship between the solicitor and PMI and the compensation that the solicitor may receive for acting on behalf of PMI. No solicitor shall provide investment advice to clients.</p>	

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