

FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

Name of Investment Adviser: Elizabeth H. Kross dba The Kross Group				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
53 School Street	Manchester-by-the-Sea	MA	01944	(978) 526-1780

**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
	Balance Sheet, if required.	Schedule G
	January 2009	

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

Applicant: Elizabeth H. Kross dba The Kross Group	SEC File Number: 801-NA	Date: 1/01/2010
-------------------------------------------------------------	-----------------------------------	---------------------------

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. Approx (See instruction below.)

Applicant:

<input type="checkbox"/>	(1) Provides investment supervisory services	_____ %
<input type="checkbox"/>	(2) Manages investment advisory accounts not involving investment supervisory services	_____ %
<input checked="" type="checkbox"/>	(3) Furnishes investment advice through consultations not included in either service described above	75% _____
<input type="checkbox"/>	(4) Issues periodicals about securities by subscription	_____ %
<input type="checkbox"/>	(5) Issues special reports about securities not included in any service described above	_____ %
<input type="checkbox"/>	(6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities	_____ %
<input checked="" type="checkbox"/>	(7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	25% _____
<input type="checkbox"/>	(8) Provides a timing service	_____ %
<input type="checkbox"/>	(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 the applicant call any of the services it checked above financial planning or some similar term? Yes No

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

<input type="checkbox"/>	(1) A percentage of assets under management	<input type="checkbox"/>	(4) Subscription fees
<input checked="" type="checkbox"/>	(2) Hourly charges	<input checked="" type="checkbox"/>	(5) Commissions
<input checked="" type="checkbox"/>	(3) Fixed fees (not including subscription fees)	<input type="checkbox"/>	(6) Other

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

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

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

<input checked="" type="checkbox"/>	A. Individuals	<input checked="" type="checkbox"/>	E. Trusts, estates, or charitable organizations
<input type="checkbox"/>	B. Banks or thrift institutions	<input type="checkbox"/>	F. Corporations or business entities other than those listed above
<input type="checkbox"/>	C. Investment companies	<input type="checkbox"/>	G. Other (describe on Schedule F)
<input checked="" type="checkbox"/>	D. Pension and profit sharing plans		

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

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 type="checkbox"/> (3) foreign issues

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

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

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

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

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

<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 | <input checked="" type="checkbox"/> H. United States government securities

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

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

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

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

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

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

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

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

Applicant:
Elizabeth H. Kross dba The Kross Group

SEC File Number:
801-NA

Date:
1/01/2010

5. Education and Business Standards.

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

6. Education and Business Background.

For:

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

On Schedule F, give the:

- name
- formal education after high school
- year of birth
- 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.)

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

Applicant: Elizabeth H. Kross dba The Kross Group	SEC File Number: 801-NA	Date: 1/01/2010
-------------------------------------------------------------	-----------------------------------	---------------------------

9. Participation or Interest in Client Transactions.

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

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

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

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

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

(If yes, describe on Schedule F.)

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

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

Financial plans are prepared for clients who have retained Applicant's services for this purpose. Upon completion of the plan, Elizabeth Kross will meet with clients to review the plan and answer any questions the client may have about the contents of the plan. There are no different levels of review. After this consultation, there are no further reviews unless the client requests additional meetings.

Clients receiving planning or consulting services are advised they should have at least an annual review and a review anytime there is a financial changes to the client's situation. Reviews may be charged additional fees as disclosed on Schedule F.

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

Financial planning clients receive no reports other than a copy of the analysis and/or recommendations. Should client implement investment recommendations clients will receive confirmations of transactions and at a minimum quarterly reports from the account custodian.

Applicant:
Elizabeth H. Kross dba The Kross Group

SEC File Number:
801-NA

Date:
1/01/2010

12. Investment or Brokerage Discretion.

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

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

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

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

13. Additional Compensation.

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

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

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

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

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

Answer all items. 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: Elizabeth H. Kross dba The Kross Group	SEC File Number: 801- NA	Date: 1/01/2010
-------------------------------------------------------------	-----------------------------	---------------------------

(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: Kross, Elizabeth H.	IRS Empl. Ident. No.: 04-3319395
-------------------------------------------------------------------------------------------------------------	--------------------------------------------

Item of Form (identify)	Answer
Item 1 D	<p>Elizabeth Kross dba The Kross Group referred to herein as “Adviser” or Kross Group.” Associated persons of Adviser referred to herein as “Advisory Representatives” or “associated persons.”</p> <p>FINANCIAL PLANNING AND CONSULTING SERVICES</p> <p>Kross Group offers various levels of financial planning services, consulting services and asset allocation services. Kross Group may offer advice and guidance on areas including, but no limited to, tax planning, estate planning, retirement planning, education planning, budgeting and cash flow, and/or company benefit analysis. The planning, consulting and asset allocation services are based on the individual client’s situation and the service is customized to the client. Typically, services are modular and targeted to a client’s particular need. Kross Group will gather financial information and history from client including, but not limited to, retirement and financial goals, investment objectives, investment horizon, financial needs, cash flow analysis, cost of living needs, education needs, savings tendencies, and other applicable financial information required by Kross Group in order to provide the investment advisory services requested. Based upon the client’s needs, Kross Group will prepare an analysis and present Kross Group’s recommendations to the client.</p> <p>Services are based on the client’s financial situation at the time and are based on financial information disclosed by the client to Kross Group. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. Kross Group cannot offer any guarantees or promises that client’s financial goals and objectives will be met. Further, client must continue to review any plan and update the plan based upon changes in the client’s financial situation, goals, or objectives or changes in the economy. Should client’s financial situation or investment goals or objectives change, clients must notify Kross Group promptly of the changes. Clients are advised that advice or guidance on a client’s insurance needs may be limited.</p> <p>Client is advised that fees for planning and consulting services are strictly for the services. Therefore, client may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.</p> <p><u>Fee Schedule</u></p> <p>Kross Group offers advisory services on both a fixed fee and hourly fee basis. The fee structure depends on the level of service requested by the client and agreement between Kross Group and the client. Fees are negotiable and are charged in accordance with the fee schedule below.</p> <p><u>Fixed fee:</u> Maximum not to exceed \$2,500 – Fees for planning services will generally be payable one-half (1/2) upon execution of the advisory agreement with Kross Group and</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: Elizabeth H. Kross dba The Kross Group	SEC File Number: 801- NA	Date: 1/01/2010
-------------------------------------------------------------	-----------------------------	---------------------------

(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: Kross, Elizabeth H.	IRS Empl. Ident. No.: 04-3319395
-------------------------------------------------------------------------------------------------------------	--------------------------------------------

Item of Form (identify)	Answer
	<p>the balance due at the time of presentation of the plan, unless otherwise negotiated with the client. Under no circumstances shall a client be requested to pay more than \$500 six (6) or more months in advance of the service being performed.</p> <p><u>Hourly Fee:</u> Maximum fee not to exceed \$250 per hour – payable as invoiced by Kross Group. Generally, Kross Group will invoice client for all time spent each month.</p> <p><u>Termination Provision</u> Client may terminate advisory services within five (5) business days after entering into the advisory agreement without penalty. After five (5) business days of entering into the advisory agreement, client may terminate upon 30-days written notice to Kross Group. Client will be responsible for any time spent by Kross Group in providing the client advisory services or analyzing the client’s situation. Any refunds of prepaid fees will be prorated based on the time spent by Kross Group multiplied by the hourly rate.</p> <p>Additionally, agreements with clients contracting with Kross Group for planning or consulting services will be deemed completed and terminated upon presentation of Kross Group’s analysis and recommendations. Agreements with annual Retainer clients will continue and renew annually until the relationship is terminated by Kross Group or the client.</p> <p style="text-align: center;">*****</p> <p>GENERAL DISCLOSURES</p> <p>Lower fees for comparable services may be available from other sources. Material conflicts of interest have been disclosed to the client in writing via the Form ADV, Part II that could cause the Kross Group or Advisory Representatives to not render unbiased and objective advice. Kross Group does not maintain custody of client funds or securities.</p> <p>Client is advised that the investment recommendations and advice offered by Kross Group are not legal advice or accounting advice. Client should coordinate and discuss the impact of financial advice with their attorney and/or accountant. Client is advised that it is necessary to inform Kross Group promptly with respect to any changes in the client’s financial situation and investment goals and objectives. Failure to notify Kross Group of any such changes could result in investment recommendations not meeting the needs of the client.</p> <p>WARRANTEES/REPRESENTATIONS Kross Group does not represent, warrantee or imply that the services or methods of analysis used by Kross Group can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to major market corrections or crashes.</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: Elizabeth H. Kross dba The Kross Group	SEC File Number: 801- NA	Date: 1/01/2010
-------------------------------------------------------------	-----------------------------	---------------------------

(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: Kross, Elizabeth H.	IRS Empl. Ident. No.: 04-3319395
-------------------------------------------------------------------------------------------------------------	--------------------------------------------

Item of Form (identify)	Answer
----------------------------	--------

No guarantees can be offered that client’s goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Kross Group will provide a better return than other investment strategies.

Varied fluctuations in the price of investments are a normal characteristic of securities markets due to a variety of influences. Managed account programs should be considered a long-term investment and thus long-term performance and performance consistency are the major goals.

PRIVACY NOTICE

Kross Group gathers various nonpublic information from clients in order to provide advisory products and services. Kross Group does not share nonpublic information with nonaffiliated third parties except as permitted by law. Clients will be provided with a copy of Kross Group’s privacy policy upon establishment of a client relationship with Kross Group and annually thereafter as long as client remains an active client.

PROXY VOTING

Clients are advised that Kross Group does not vote proxies on clients’ behalf or take responsibility in any way to ensure client’s securities are voted. Clients retain the responsibility for voting their own proxies.

Item 5	<p><u>Education and Business Standards</u></p> <p>Advisory Representatives must have obtained a passing score (generally, 70%) on the securities examinations required by the jurisdictions in which investment advisory business will be offered. Generally states require an Advisory Representative to have passed the Series 7 and 66 examinations or the Series 65 examination. Alternatively, a professional designation such as the Certified Financial Planner (“CFP”), Chartered Financial Consultant (“ChFC”), Certified Financial Analysis (“CFA”), CIC and/or PFS may exempt a person from taking the aforementioned exams.</p>
--------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Item 6	<p><u>Education and Business Background</u></p> <p>Elizabeth Kross Date of Birth: 19</p> <p><i>Education:</i></p> <ul style="list-style-type: none"> ○ Bennett College, Millbrook, NY – attended from 1964 to 1966, graduated in 1966 with a A.A. <p><i>Business Background:</i></p> <ul style="list-style-type: none"> ○ Elizabeth H. Kross dba The Kross Group (formerly Harbor Investment Group), an investment adviser – position: Owner – 02/2007 to Present ○ Commonwealth Financial Network, a broker/dealer and investment adviser – position: Registered Representative and Advisory Representative – 05/1996 to 04/2009 ○ Beacon Investment Management, LLC, an investment adviser - – position:
--------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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: Elizabeth H. Kross dba The Kross Group	SEC File Number: 801- NA	Date: 1/01/2010
-------------------------------------------------------------	-----------------------------	---------------------------

(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: Kross, Elizabeth H.	IRS Empl. Ident. No.: 04-3319395
Item of Form (identify)	Answer
	Advisory Representative – 07/1999 to 03/2007
Item E	<p><u>Participation or Interest in Client Transactions</u></p> <p>Kross Group and its associated persons may buy or sell securities identical to those securities recommended to clients. Therefore, they may have an interest or position in certain securities that are also recommended and bought or sold to clients. Kross Group and its associated persons will not put their interests before a client’s interest. Kross Group and its associated persons may not trade ahead of their clients or trade in such a way to obtain a better price for themselves than for their clients. Kross Group is required to maintain a list of all securities holdings for its associated persons. Further, associated persons are prohibited from trading on non-public information or sharing such information. Clients have the right to decline any investment recommendation. Kross Group and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.</p> <p>CODE OF ETHICS</p> <p>Kross Group has a fiduciary duty to clients to act in the best interest of the client and always place the client’s interests first and foremost. Kross Group takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as Kross Group’s policies and procedures. Further, Kross Group strives to handle clients’ non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides clients with Kross Group’s Privacy Policy. As such, Kross Group maintains a code of ethics for its associated persons, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about client transactions. Further, Kross Group’s Code of Ethics establishes Kross Group’s expectation for business conduct. A copy of the Code of Ethics will be provided to any Client or prospective Client upon request.</p> <p><u>For Massachusetts based Investment Advisers</u></p> <p>Disciplinary history and the registration of the adviser and its associated persons may be obtained by contacting the Public Reference branch of the U.S. Securities an Exchange Commission at (617) 727-3548 or the Massachusetts Securities Division, One Ashburton Place, 17th Floor, Boston, MA 02108</p>

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