Conway Jarvis LLC
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Brochure dated March 31, 2011

This brochure provides information about the qualifications and business practices of Conway Jarvis LLC. If you have any questions about the contents of this brochure, please contact us at [telephone number and/or email address]. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Conway Jarvis LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

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Advisory Business

Conway Jarvis LLC is an independent investment advisor. It provides investment supervisory services to: high-net worth individuals and their families; businesses; trusts; pension and profit sharing plans. The firm was founded in 1994 and is wholly-owned by Greg Conway and Eric Jarvis.

> **Gregory J. Conway -** University of Washington (B.A. Political Science) and Gonzaga University Law School (J.D.). Managing Partner, Principal, Chief Compliance Officer, Conway Jarvis LLC, 1994 to present. Managing Partner, Principal, Conway Labanara Capital Management, 1990-1994. Vice-President , Portfolio Manager with Van Deventer & Hoch, 1989-1991. Vice-President, Corporate Services, Oppenheimer & Co. Inc., 1987-1989. Risk Management Strategist, Futures Specialist, Registered Representative, Dean Witter Inc., 1975-1987.
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> **Eric P. Jarvis** - University of Washington, (B.A. Business), University of Washington Business School, (MBA in Finance). General Partner, Chief Financial Officer, Director of Portfolio Management, Conway Jarvis LLC, 1994 to present. Director of Operations, Conway Labanara Capital Management, 1992-1994. Buyer/Manager, Nordstrom Incorporated, 1985-1991.

As of December 31, 2010, the firm managed $211,000,000 in client assets. Those assets are held by brokerage firms in the name of the client. The firm is authorized by clients to use its discretion to invest in the publicly traded securities markets. Advisory services are tailored to the individual needs of each client. Clients may impose restrictions on investing in certain securities or types of securities.

Fees and Compensation

The firm is compensated by fees that are calculated on the amount of assets under active management. A fee schedule is provided to prospective clients prior to engagement of the firm’s services. Clients are billed quarterly, in advance, and can choose to pay fees or have them deducted from their account. Unearned fees will be refunded to the client on a pro rata basis. Clients may incur brokerage fees, custody fees, or additional transaction costs as described in the Brokerage Practices section of this brochure.

Types of Clients

Conway Jarvis LLC provides investment supervisory services to: high-net worth individuals and their families; businesses; trusts; pension and profit sharing plans. The firm suggests that a prospective client have minimum of $250,000 of investable assets available for management. Family assets can be aggregated to meet that minimum requirement. This requirement is waived for family members, related persons, or related entities of existing clients.

Methods of Analysis

The firm employs a combination of macro-economic, fundamental, and technical analysis to select securities. The information used in this analysis is obtained from, research materials, data services, financial publications, filings of public information, and inspection of corporate activities. Analysis and formulation of investment strategies is conducted by the Investment Committee.

Investment Strategies

The firm employs a broad, multi-level investment strategy to address the needs of a diverse client base. Portfolios are linked to models that employ an all-country, all-capitalization, all-industry approach to investing. Portfolios are invested with publicly-traded securities that reflect both long-term expectations and potential tactical responses to changing conditions in the short and intermediate term. Exchange traded funds may be used where individual stocks lack sufficient liquidity or representation of a specific region or market.

Risk of Loss

Investing in securities involves risk of loss. Owning equities traded in the public markets presents a material risk of loss from economic instability, market volatility, dissemination of false information, poor performance by a company, and systemic risk arising from fraudulent conduct by market participants. There is risk that the firm could fail to discern the presence of any of these factors when investing client assets.

Disciplinary Information

There are no legal or disciplinary events in the firm’s history or that of its owners.

Other Financial Industry Activities and Affiliations

The firm, its principals, and employees are not affiliated with any other financial services entity.

Code of Ethics and Personal Trading

Conway Jarvis LLC adheres to a Code of Ethics that proscribes the conduct of the owners and employees as it relates to clients. Specific provisions deal with limitations on personal trading and maintaining client confidentiality. A copy will be provided to clients and prospective clients upon request.

The owners and employees of the firm are encouraged to buy and sell the same securities as clients. Limitations on personal trading require that the firm’s personnel receive no better price of execution on a day when a security is bought or sold for client accounts. Trades in the same security can be made by Conway Jarvis personnel if preceded or followed by a three-day waiting period. The firm maintains a record of all personal trades for the purpose of monitoring personal trading and avoiding a conflict of interest.

Brokerage Practices

Where clients decline to specify a brokerage firm, Conway Jarvis LLC will recommend several from which to choose. Those presented to the client must provide superior order execution, service capabilities, and discounted commission rates after consideration of factors such as reliability, responsiveness, and financial strength.

Clients may not pay the lowest possible commission rates where they receive special services such as check-writing privileges, accounting and performance evaluation services. Whenever possible, the firm aggregates the trades of participating clients to obtain best execution and pricing for the purchase and sale of equities. Conway Jarvis can direct the purchase and sale of fixed-income securities to brokerage firms for the purpose of obtaining best execution and pricing.

Review of Accounts

All client accounts are valued daily and reviewed for performance and asset allocation monthly. More frequent reviews are available upon request. Securities in those accounts are monitored daily and reviewed weekly by the Investment Committee or more frequently if price activity or market conditions dictate.

The firm reports quarterly to clients. The statement provides security pricing, account valuation, and performance of the portfolio benchmarked to an array of indices. Performance is calculated in accordance with CFA Institute standards. The statement is accompanied by a Market Commentary formulated by the firm. A newsletter, the Conway Jarvis Investment Outlook is distributed quarterly.

Client Referrals and Other Compensation

Conway Jarvis LLC receives client referrals from Charles Schwab & Co., Inc. through the firm's participation in Schwab Advisor Network ™. Schwab is a broker-dealer independent of and unaffiliated with Conway Jarvis. Schwab has no responsibility for the management of client portfolios. CJ LLC pays Schwab fees to receive client referrals through the Service. CJ LLC's participation in the Service may raise potential conflicts of interest described below.

Custody

Conway Jarvis does not take or maintain custody of client funds or securities. Clients will receive monthly statements from the brokerage firm that holds their securities and funds. Theses should be reviewed carefully and compared to the quarterly statements distributed by Conway Jarvis.

Investment Discretion

Conway Jarvis accepts discretionary authority to manage securities accounts on behalf of clients. This authority is granted by execution of a Limited Power of Attorney, provided by the brokerage firm, allowing Conway Jarvis to place trades, receive brokerage statements, view account data, request fund disbursements to clients, and deduct a management fee. This authority is strictly limited to those specific activities

Voting Client Securities

Conway Jarvis LLC will, upon request, vote proxies received from companies that are beneficially owned by clients. Guidelines have been established and adhered to by the firm in fulfilling their fiduciary duty to clients. These are stated in the Proxy Voting Policy that is available upon request. Proxy proposals will be evaluated and voted upon in a manner that will promote the financial interests of the clients of Conway Jarvis LLC.