

Uniform Application for Investment Adviser Registration

OMB APPROVAL	
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Name of Investment Adviser: Squire Investment Management Company, LLC					
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code	Telephone Number
1329 South 800 East	Orem	UT	84097	(801)	226 - 7722

**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 governmental 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

(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.)

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:

<input checked="" type="checkbox"/>	(1)	Provides investment supervisory services	<u>90</u>	%
<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	<u>5</u>	%
<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	<u>5</u>	%
<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 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 checked="" type="checkbox"/>	(1)	A percentage of assets under management	<input type="checkbox"/>	(4)	Subscription fees
<input checked="" type="checkbox"/>	(2)	Hourly charges	<input type="checkbox"/>	(5)	Commissions
<input 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 checked="" 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)

- A. Equity securities
- (1) exchange-listed securities
 - (2) securities traded over-the-counter
 - (3) foreign issuers
- B. Warrants
- C. Corporate debt securities (other than commercial paper)
- D. Commercial paper
- E. Certificates of deposit
- F. Municipal securities
- G. Investment company securities:
- (1) variable life insurance
 - (2) variable annuities
 - (3) mutual fund shares
- H. United States government securities
- I. Options contracts on:
- (1) securities
 - (2) commodities
- J. Futures contracts on:
- (1) tangibles
 - (2) intangibles
- K. Interests in partnerships investing in:
- (1) real estate
 - (2) oil and gas interests
 - (3) other (explain on Schedule F)
- 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) Charting
- (2) Fundamental
- (3) Technical
- (4) Cyclical
- (5) Other (explain on Schedule F)

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

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

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

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

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

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
 - (7) accounting firm
 - (2) investment company
 - (8) law firm
 - (3) other investment adviser
 - (9) insurance company or agency
 - (4) financial planning firm
 - (10) pension consultant
 - (5) commodity pool operator, commodity trading adviser or futures commission merchant
 - (11) real estate broker or dealer
 - (6) banking or thrift institution
 - (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.)

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.

Please see Schedule F

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

Please see Schedule F

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

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 checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) broker or dealer to be used? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) commission rates paid? | Yes <input checked="" type="checkbox"/> | No <input 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).

Applicant: Squire Investment Management Company, LLC	SEC File Number: 801- 68147	Date:
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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: Squire Investment Management Company, LLC	IRS Empl. Ident. No.: 87-0646348
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Item of Form (identify)	Answer
1.D	<p><u>SERVICES AND FEES</u></p> <p>Squire Investment Management Company, LLC (hereinafter "SimCo"), offers the following services to advisory clients.</p> <p>INVESTMENT MANAGEMENT SERVICES</p> <p>SimCo manages investment portfolios for individuals, qualified retirement plans, trusts, charitable organizations, and small businesses, corporations and/or other businesses. SimCo will work with the client to determine the client's investment objectives and investor risk profile and will design a written investment policy statement. SimCo uses investment and portfolio allocation software to evaluate alternative portfolio designs. SimCo evaluates the client's existing investments with respect to the client's investment policy statement. SimCo works with new clients to develop a plan to transition from the client's existing portfolio to the desired portfolio. SimCo 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>SimCo will typically create a portfolio of no-load mutual funds, and may use model portfolios if the models match the client's investment policy. SimCo will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. SimCo primarily recommends portfolios consisting of mutual funds offered by Dimensional Fund Advisors (DFA). DFA sponsored mutual funds follow a passive asset class investment philosophy with low holdings turnover. Consequently, the DFA fund fees are generally lower than fees and expenses charged by other types of funds. Client portfolios may also include some individual equity securities. SimCo manages mutual fund and equity portfolios on a discretionary basis.</p> <p>SimCo may also recommend fixed income portfolios to advisory clients, which consist of managed accounts of individual bonds. SimCo will request discretionary authority from advisory clients to manage fixed income portfolios, including the discretion to retain a third party fixed income manager. SimCo will prepare a separate Fixed Income Addendum that becomes part of the Investment Policy Statement for any client qualifying for separate fixed income portfolio services.</p> <p>Pursuant to its discretionary authority, SimCo will retain a fixed income securities manager. The fixed income securities manager will be provided with the discretionary authority to invest client assets in fixed income securities consistent with the client's Fixed Income Investment Policy Statement. The manager will also monitor the account for changes in credit ratings, security call provisions, and tax loss harvesting opportunities (to the extent that the manager is provided with cost basis information). The manager will obtain SimCo's consent prior to the sale of any client securities.</p> <p>On an ongoing basis, SimCo will answer clients' inquiries regarding their accounts and review periodically with clients the performance of their accounts.</p>

(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: Squire Investment Management Company, LLC	IRS Empl. Ident. No.: 87-0646348
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Item of Form (identify)	Answer																
	<p>SimCo will periodically, and at least annually, review client's investment policy, risk profile and discuss the re-balancing of each client's accounts to the extent appropriate. SimCo will provide to investment manager any updated client financial information or account restrictions necessary for investment manager to provide sub-advisory services.</p> <p><i>FEES:</i> 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="1" style="margin-left: 40px;"> <thead> <tr> <th><u>Assets Under Management</u></th> <th><u>Annual Fee (%)</u></th> </tr> </thead> <tbody> <tr> <td>\$0 - \$500,000</td> <td>1.25%</td> </tr> <tr> <td>\$500,001 - \$750,000</td> <td>1.10%</td> </tr> <tr> <td>\$750,001 - \$1 million</td> <td>1.00%</td> </tr> <tr> <td>\$1 million - \$2 million</td> <td>0.90%</td> </tr> <tr> <td>\$2 million - \$3 million</td> <td>0.80%</td> </tr> <tr> <td>\$3 million - \$4 million</td> <td>0.70%</td> </tr> <tr> <td>Above \$4 million</td> <td>0.60%</td> </tr> </tbody> </table> <p>SimCo generally requires a minimum account of \$100,000 for Investment Management Services. SimCo retains the discretion to reduce or waive these minimums based upon individual client circumstances (e.g., the nature of current investments, future contributions by client to the account, etc.). All accounts for members of the client's family (husband, wife and dependent children) or related businesses may be assessed fees based on the total balance of all accounts.</p> <p>EMPLOYEE BENEFIT RETIREMENT PLAN SERVICES SimCo also provides advisory services to participant-directed employee retirement benefit plans. SimCo will analyze the plan's current investment platform, and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed. SimCo will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.</p> <p>SimCo will recommend changes in the plan's investment vehicles as may be appropriate from time to time. SimCo generally will review the plan's investment vehicles and investment policy as necessary.</p> <p><i>FEES:</i> The annual fee for plan services will be charged as a percentage of assets within the plan. Typically, the annual fee will be 75 percent of the above quoted fees for investment management services.</p> <p>FINANCIAL PLANNING: SimCo also provides advice in the form of a Financial Plan. Clients purchasing this service will receive a written report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.</p>	<u>Assets Under Management</u>	<u>Annual Fee (%)</u>	\$0 - \$500,000	1.25%	\$500,001 - \$750,000	1.10%	\$750,001 - \$1 million	1.00%	\$1 million - \$2 million	0.90%	\$2 million - \$3 million	0.80%	\$3 million - \$4 million	0.70%	Above \$4 million	0.60%
<u>Assets Under Management</u>	<u>Annual Fee (%)</u>																
\$0 - \$500,000	1.25%																
\$500,001 - \$750,000	1.10%																
\$750,001 - \$1 million	1.00%																
\$1 million - \$2 million	0.90%																
\$2 million - \$3 million	0.80%																
\$3 million - \$4 million	0.70%																
Above \$4 million	0.60%																

(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: Squire Investment Management Company, LLC	IRS Empl. Ident. No.: 87-0646348
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Item of Form (identify)	Answer
	<p>In general, the financial plan will address any or all of the following areas of concern:</p> <ul style="list-style-type: none"> - PERSONAL: Family records, budgeting, personal liability, estate information and financial goals. - TAX & CASH FLOW: Income tax and spending analysis and planning for past, current and future years. SimCo will illustrate the impact of various investments on a client's current income tax and future tax liability. - DEATH & DISABILITY: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis. - RETIREMENT: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals. - INVESTMENTS: Analysis of investment alternatives and their effect on a client's portfolio. <p>SimCo gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should a client choose to implement the recommendations contained in the plan, SimCo suggests the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.</p> <p>Financial Planning recommendations are not limited to any specific product or service offered by a broker dealer or insurance company. All recommendations are of a generic nature.</p> <p><i>FEES:</i> Financial planning fees will be charged on an hourly basis at the rate of \$250 an hour. An estimate for total hours will be determined at the start of the advisory relationship. 50% of the estimated fee may be due upon signing the advisory agreement, with the balance (based on actual hours) due upon presentation of the plan to the client.</p> <p>Typically the financial plan will be presented to the client within 90 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the client.</p> <p>SimCo will never hold client funds greater than \$500 for more than six months in advance of completion of the financial plan.</p>

Applicant: Squire Investment Management Company, LLC	SEC File Number: 801- 68147	Date:
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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Squire Investment Management Company, LLC	IRS Empl. Ident. No.: 87-0646348
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Item of Form (identify)	Answer
	<p><u>GENERAL INFORMATION ON SERVICES AND FEES:</u></p> <p>SimCo has contracted with BAM Advisor Services, LLC (BAM), for services including trade processing, collection of management fees, record maintenance, report preparation, marketing assistance, and research. SimCo has also contracted with BAM for sub-advisory services with respect to Clients' fixed income accounts. SimCo pays a fee for BAM services based on management fees paid to SimCo on accounts that use BAM Advisor Services. The fee paid by SimCo to BAM consists of a portion of the fee paid by clients to SimCo and varies based on the total client assets participating in BAM Advisor Services through SimCo. These fees are not separately charged to advisory clients.</p> <p>For an additional fee, SimCo may hire BAM's affiliate, Buckingham Asset Management Inc., as a fixed income separate account manager. In such cases, Client will be provided with Buckingham's ADV Part II and Privacy Policy and will be required to sign a fixed income investment advisory agreement that allows SimCo to delegate any and all investment discretion solely with respect to Client's fixed income portfolio to a portfolio manager selected by SimCo. Buckingham Asset Management, Inc. is affiliated with BAM Advisor Services.</p> <p>In certain circumstances, all fees, account minimums and their applications to family circumstances may be negotiable.</p> <p>Clients will be invoiced in advance at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value) of the client's account at the end of the previous quarter. New accounts are charged a prorated fee for the remainder of the quarter in which the account is incepted (date of first trade).</p> <p>SimCo will request authority from the client to receive quarterly payments directly from the client's account held by an independent custodian. Clients may provide written limited authorization to SimCo or its designated service provider, BAM, to withdraw fees from the account. SimCo will send to the client an invoice showing the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the fee was calculated. Clients should verify the accuracy of the fee calculations in such invoices.</p> <p>All fees are calculated as described above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds or any portion of the funds of an advisory client.</p> <p>A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.</p>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

I. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Squire Investment Management Company, LLC	IRS Empl. Ident. No.: 87-0646348
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Item of Form (identify)	Answer
4.A.(5), 4.B.(8), & 4.C.(7)	<p>All fees paid to SimCo for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in mutual funds directly, without the services of SimCo. In that case, the client would not receive the services provided by SimCo which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. DFA funds also may not be available to the client directly. Accordingly, the client should review both the fees charged by the funds and the fees charged by SimCo to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.</p> <p>Proxy Voting</p> <p>SimCo has no responsibility to vote or give any advice about the voting of any proxies for securities held in client portfolios as clients have retained proxy voting authority. For any pension plan or other employee benefit plan governed by ERISA, the right and responsibility to vote proxies has been expressly reserved to the plan trustees or other plan fiduciary.</p> <p>A client may request assistance about the voting of any proxies. In that event, SimCo may provide assistance to a client but the client always has the responsibility to make the voting decision and vote any proxies.</p> <p><u>SECURITIES ANALYSIS METHODS; SOURCES OF INFORMATION; INVESTMENT STRATEGIES</u></p> <p>SimCo's security analysis is based on a number of factors including those derived from commercially available software technology, securities rating services, general market and financial information, due diligence reviews and specific investment analysis that clients may request.</p> <p>SimCo's main sources of information include BAM Advisor Services, commercially available investment services, financial newspapers, periodicals and issuer-prepared information. SimCo receives investment recommendations, including model portfolios, from BAM that it may use to provide individualized advice to clients. BAM does not provide any investment advice to SimCo's advisory clients.</p> <p>SimCo's investment advice is based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. SimCo's investment approach is firmly rooted in the belief that markets are efficient and that investors' returns are determined principally by asset allocation decisions, not by market timing or stock picking. SimCo focuses on developing diversified portfolios, principally through the use of passively managed, asset class mutual funds that are available only to institutional investors and</p>

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Squire Investment Management Company, LLC		IRS Empl. Ident. No.: 87-0646348
Item of Form (identify)	Answer	
5	clients of a network of selected investment advisors. SimCo may also recommend the use of long-term investment techniques such as dollar-cost averaging. <u>EDUCATION AND BUSINESS STANDARDS</u> Advisory persons associated with SimCo must possess, minimally, the following: A college degree and/or appropriate business experience and all required licenses.	
6	<u>EDUCATION AND BUSINESS BACKGROUND</u> TIMOTHY ALDEN CHRISTENSEN BORN: 1958 <u>EDUCATION:</u> Graduated from Ricks College in 1980 with an Associates in Accounting. Graduated from Brigham Young University in 1983 with a BS in Accounting and a Masters in Accounting/Tax. <u>EMPLOYMENT HISTORY:</u> Managing Member & Chief Compliance Officer of Squire Investment Management Company, LLC from 01/00 to present. CPA, Shareholder for Squire & Company PC from 12/81 to present. JULIE CHRISTINE ANDERSON BORN: 1970 <u>EDUCATION:</u> Graduated from Brigham Young University in 1994 with a BS in Accounting and a Masters in Accounting. <u>EMPLOYMENT HISTORY:</u> Investment Adviser Representative of Squire Investment Management Company, LLC from 07/04 to present. CPA, Manager for Squire & Company PC from 01/04 to present. CPA, Shareholder, Vice President and Treasurer of Hillstead Anderson & Company, Inc., from 11/00 to present. WAYNE FREDERICK BARBEN BORN: 1970 <u>EDUCATION:</u> Graduated from Snow College in 1993 with an Associates in Science. Graduated from Utah State University in 1996 with a BS in Accounting. Graduated from Utah State University in 1997 with a Masters in Accounting.	

(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: Squire Investment Management Company, LLC	IRS Empl. Ident. No.: 87-0646348
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Item of Form (identify)	Answer
7.C & 8.C.(7)	<p>EMPLOYMENT HISTORY: Investment Adviser Representative of Squire Investment Management Company, LLC from 07/04 to present. CPA, Manager of Squire & Company PC from 06/97 to present.</p> <p><u>SQUIRE & COMPANY PC</u></p> <p>The Managing Member of SimCo, Timothy Christensen, is also a shareholder of the accounting firm, Squire & Company PC.</p> <p>Squire & Company PC (hereinafter "S&C") may recommend SimCo to accounting clients in need of advisory services. SimCo may recommend S&C to advisory clients in need of accounting services. Accounting services provided by S&C are separate and distinct from the advisory services of SimCo, and are provided for separate and typical compensation. There are no referral fee arrangements between SimCo and S&C for these recommendations. No SimCo client is obligated to use S&C for any accounting services.</p> <p>Although Timothy Christensen is primarily engaged in activities on behalf of SimCo, he may spend up to 33% of his business time engaged in business on behalf of S&C.</p>
8.C.(9)	<p><u>SQUIRE INSURANCE, LLC</u></p> <p>SimCo is also affiliated through common ownership with the insurance agency, Squire Insurance, LLC. Financial planning advice may include insurance needs analysis, and SimCo may refer clients to Squire Insurance, LLC. No advisory client is obligated to purchase insurance products through this affiliated company. A separate commission may be received if a client does purchase an insurance product through Squire Insurance, LLC. Clients should be aware that this separate compensation creates a conflict of interest.</p>
9.E	<p><u>CODE OF ETHICS</u></p> <p>SimCo has adopted a Code of Ethics that sets forth high ethical standards of business conduct that SimCo requires of its employees, including compliance with applicable federal securities laws. Our Code of Ethics also includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by SimCo's covered persons. Among other things, SimCo's Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also includes oversight, enforcement and recordkeeping provisions. A copy of SimCo's Code of Ethics is available to SimCo's advisory clients upon request to the Chief Compliance Officer at SimCo's principal office address.</p>

(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: Squire Investment Management Company, LLC	IRS Empl. Ident. No.: 87-0646348
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Item of Form (identify)	Answer
10	<p><u>CONDITIONS FOR MANAGING AN ACCOUNT</u></p> <p>SimCo requires a minimum account of \$100,000 for Investment Management Services. SimCo retains the discretion to reduce or waive these minimums based upon individual client circumstances (e.g., the nature of current investments, future contributions by client to the account, etc.). All accounts for members of the client's family (husband, wife and dependent children) or related businesses may be assessed fees based on the total balance of all accounts.</p> <p>Please refer to Item 1.D. of this Schedule F narrative for complete detail.</p>
11.A	<p><u>REVIEWS AND REVIEWERS OF ACCOUNTS</u></p> <p>INVESTMENT MANAGEMENT SERVICES: Account assets are supervised continuously and formally reviewed quarterly by the Managing Member of SimCo, Timothy Christensen. The review process contains each of the following elements:</p> <ul style="list-style-type: none"> a. assessing client goals and objectives; b. evaluating the employed strategy(ies); c. monitoring the portfolio(s); and d. addressing the need to rebalance. <p>Additional account reviews may be triggered by any of the following events:</p> <ul style="list-style-type: none"> a. a specific client request; b. a change in client goals and objectives; c. an imbalance in a portfolio asset allocation; and d. market/economic conditions. <p>EMPLOYEE BENEFIT RETIREMENT PLAN SERVICES: Plan assets are reviewed on a quarterly basis, and according to the standards and situations described above for investment management accounts.</p> <p>FINANCIAL PLANNING: These client accounts will be reviewed as contracted for at the inception of the advisory relationship.</p>
11.B	<p><u>REGULAR REPORTS PROVIDED TO CLIENTS</u></p> <p>All clients will receive quarterly performance reports, prepared by BAM and reviewed by SimCo, that summarize the client's account and asset allocation. Clients will also receive monthly statements from their account custodian, which will outline the client's current positions, and current market value.</p>

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12.A.(1) & 12.A.(2)	<p>FINANCIAL PLANNING: These client accounts will receive reports as contracted for at the inception of the advisory relationship.</p> <p>INVESTMENT DISCRETION</p> <p>SimCo requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.</p> <p>For fixed income securities, this authority will include the discretion to retain a third party money manager for fixed income accounts exceeding \$400,000.</p>
12.A.(3), 12.A.(4) & 12.B	<p>BROKERAGE DISCRETION AND RECOMMENDATIONS</p> <p>INVESTMENT MANAGEMENT SERVICES SimCo arranges for the execution of all securities transactions with the assistance of BAM Advisor Services. Through BAM, SimCo may participate in the Schwab Institutional (SI) services program offered to independent investment advisers by Charles Schwab & Company, Inc., and the Fidelity Registered Investment Advisor Group ('FRIAG') program, sponsored by Fidelity Brokerage Services LLC. Schwab and Fidelity are FINRA registered broker dealers.</p> <p>The Schwab and Fidelity brokerage programs will generally be recommended to advisory clients for the execution of mutual fund and equity securities transactions. SimCo regularly reviews these programs to ensure that its recommendations are consistent with its fiduciary duty. These trading platforms are essential to SimCo's service arrangements and capabilities, and SimCo may not accept clients who direct the use of other brokers. As part of these programs, SimCo receives benefits that it would not receive if it did not offer investment advice. Through BAM Advisor Services, SimCo may also receive benefits from Peoples Benefit Life Insurance Company and/or Aegon. (See the disclosure under Item 13.A. of this Schedule F narrative).</p> <p>As SimCo will not request the discretionary authority to determine the broker dealer to be used or the commission rates to be paid in these situations, clients must direct SimCo as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that SimCo will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. Not all investment advisers require clients to direct the use of specific brokers.</p>

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	<p>SimCo will not exercise authority to arrange client transactions in fixed income securities. Clients will provide this authority to a fixed income manager retained by SimCo on client's behalf by designating the portfolio manager with trading authority over client's brokerage account. Clients will be provided with the Disclosure Brochure (Form ADV Part II) of such portfolio manager.</p> <p>SI and FRIAG do not generally charge clients a custody fee and are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through the broker or that settle into the clients' accounts at the brokers. Trading client accounts through other brokers may result in fees (including mark-ups and mark-downs) being charged by the custodial broker and an additional broker. While SimCo will not arrange transactions through other brokers, the authority of the fixed income portfolio manager includes the ability to trade client fixed income assets through other brokers.</p> <p>SimCo does not block affiliated trades with any client trades. SimCo also does not have any arrangements to compensate any broker dealer for client referrals.</p> <p>TRADE ERRORS</p> <p>In all circumstances involving trade errors, clients are "made whole." For clients utilizing Schwab for custodial and brokerage services, Schwab keeps all trade error gains. Schwab forgives all trade error losses under \$100. SimCo is always responsible for trade error losses over \$100. For clients utilizing Fidelity for custodial and brokerage services, SimCo is always responsible for trade error losses. Fidelity provides to SimCo trade error gains for which it is responsible. For such situations, SimCo has established a separate Trade Error Account to use such gains to offset any losses for which it is responsible.</p> <p>EMPLOYEE BENEFIT RETIREMENT PLAN SERVICES</p> <p>SimCo does not arrange for the execution of securities transactions for plans as a part of this service. Transactions are executed directly through employee plan participation.</p> <p>FINANCIAL PLANNING:</p> <p>SimCo's financial planning practice, due to the nature of its business and client needs, does not include blocking trades, negotiating commissions with broker dealers or obtaining volume discounts, nor necessarily obtaining the best price. Clients will be required to select their own broker dealers and insurance companies for the implementation of financial planning recommendations. SimCo may recommend any one of several brokers. SimCo clients must independently evaluate these brokers before opening an account. The factors considered by SimCo when making this recommendation are the broker's ability to provide professional services, SimCo's experience with the broker, the broker's reputation, and the broker's financial strength,</p>

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13.A	<p>among other factors. SimCo's financial planning clients may use any broker or dealer of their choice.</p> <p><u>OTHER BENEFITS</u></p> <p>SI and FRIAG each respectively provide SimCo with access to institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis at no charge to them. SI requires an adviser maintain a total of at least \$10 million of the advisor's clients' assets to be maintained in accounts at Schwab Institutional, or otherwise charges advisor a fee for these services. These services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.</p> <p>Schwab and FRIAG also make available to SimCo other products and services that benefit SimCo but may not benefit its clients' accounts. Some of these other products and services assist SimCo in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of SIMCO's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of SimCo's accounts. Recommended brokers also make available to SimCo other services intended to help SimCo manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. SimCo does not, however, enter into any commitments with the brokers for transaction levels in exchange for any services or products from brokers. While as a fiduciary, SimCo endeavors to act in its clients' best interests, SimCo's requirement that clients maintain their assets in accounts at Schwab or FRIAG may be based in part on the benefit to SimCo of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the brokers, which may create a potential conflict of interest.</p> <p>Through BAM, SimCo utilizes software from DFA. SimCo also receives benefits from Peoples Benefit Life Insurance Company and/or Aegon through BAM, including direct access to real-time client account information, the ability to electronically enter transactions and access balances and positions, as well as the ability to directly debit advisory fees.</p>