

FORM ADV
Uniform Application for Investment Adviser Registration
Part II – Page 1

OMB APPROVAL	
OMB Number:	3235-0049
Expires:	February 28, 2011
Estimated average burden	
Hours per response. . . .	4.07

Name of Investment Adviser: TFT Advisors, LLC				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
6005 Hidden Valley Road, Suite 105	Carlsbad	CA	92011	(760) 448-2882

**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

(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.

Applicant: TFT Advisors, LLC	SEC File Number: 801-	Date: 09/15/2009
---------------------------------	--------------------------	---------------------

Definitions for Part II

Related person - Any officer, director or partner of applicant or any person directly or indirectly controlling, controlled by, or under common control with the applicant, including any non-clerical, non-ministerial employee.

Investment Supervisory Services - Giving continuous investment advice to a client (or making investments for the client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client's personal and family obligations.

1.	<p>A. Advisory Services and Fees. (check the applicable boxes)</p> <p>Applicant:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%;"><input checked="" type="checkbox"/></td> <td style="width: 75%;">(1) Provides investment supervisory services</td> <td style="width: 20%; text-align: right;">60 %</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(2) Manages investment advisory accounts not involving investment supervisory services</td> <td style="text-align: right;">_____ %</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>(3) Furnishes investment advice through consultations not included in either service described above</td> <td style="text-align: right;">38 %</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(4) Issues periodicals about securities by subscription</td> <td style="text-align: right;">_____ %</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(5) Issues special reports about securities not included in any service described above</td> <td style="text-align: right;">_____ %</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities</td> <td style="text-align: right;">_____ %</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>(7) On more than an occasional basis, furnishes advice to clients on matters not involving securities</td> <td style="text-align: right;">2 %</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(8) Provides a timing service</td> <td style="text-align: right;">_____ %</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(9) Furnishes advice about securities in any manner not described above</td> <td style="text-align: right;">_____ %</td> </tr> </table> <p style="text-align: center;">(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.)</p>	<input checked="" type="checkbox"/>	(1) Provides investment supervisory services	60 %	<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	38 %	<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	2 %	<input type="checkbox"/>	(8) Provides a timing service	_____ %	<input type="checkbox"/>	(9) Furnishes advice about securities in any manner not described above	_____ %	<p>For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)</p>
<input checked="" type="checkbox"/>	(1) Provides investment supervisory services	60 %																											
<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	38 %																											
<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	2 %																											
<input type="checkbox"/>	(8) Provides a timing service	_____ %																											
<input type="checkbox"/>	(9) Furnishes advice about securities in any manner not described above	_____ %																											
	<p>B. Does the applicant call any of the services it checked above financial planning or some similar term?</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>																											
	<p>C. Applicant offers investment advisory services for: (check all that apply):</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><input checked="" type="checkbox"/> (1) A percentage of assets under management</td> <td style="width: 50%;"><input type="checkbox"/> (4) Subscription fees</td> </tr> <tr> <td><input checked="" type="checkbox"/> (2) Hourly charges</td> <td><input type="checkbox"/> (5) Commissions</td> </tr> <tr> <td><input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees)</td> <td><input checked="" type="checkbox"/> (6) Other</td> </tr> </table>	<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 checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees)	<input checked="" type="checkbox"/> (6) Other																						
<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 checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees)	<input checked="" type="checkbox"/> (6) Other																												
	<p>D. For each checked box in A above, describe on Schedule F:</p> <ul style="list-style-type: none"> • 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.	<p>Types of Clients - Applicant generally provides investment advice to: (check those that apply)</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><input checked="" type="checkbox"/> A. Individuals</td> <td style="width: 50%;"><input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations</td> </tr> <tr> <td><input type="checkbox"/> B. Banks or thrift institutions</td> <td><input type="checkbox"/> F. Corporations or business entities other than those listed above</td> </tr> <tr> <td><input type="checkbox"/> C. Investment companies</td> <td><input type="checkbox"/> G. Other (describe on Schedule F)</td> </tr> <tr> <td><input checked="" type="checkbox"/> D. Pension and profit sharing plans</td> <td></td> </tr> </table>	<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																					
<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																													

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"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input type="checkbox"/> I. Options contracts on: |
| <input checked="" type="checkbox"/> (3) foreign issues | <input checked="" type="checkbox"/> (1) securities |
| | <input type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> B. Warrants | |
| <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 checked="" type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> G. Investment company securities | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (1) variable life insurance | <input checked="" type="checkbox"/> L. Other (explain on Schedule F) |
| <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 type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

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

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

Applicant: TFT Advisors, LLC	SEC File Number: 801-	Date: 09/15/2009
---------------------------------	--------------------------	---------------------

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:

<input type="checkbox"/> (1) broker-dealer	<input type="checkbox"/> (7) accounting firm
<input type="checkbox"/> (2) investment company	<input type="checkbox"/> (8) law firm
<input type="checkbox"/> (3) other investment adviser	<input type="checkbox"/> (9) insurance company or agency
<input type="checkbox"/> (4) financial planning firm	<input type="checkbox"/> (10) pension consultant
<input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant	<input checked="" type="checkbox"/> (11) real estate broker or dealer
<input type="checkbox"/> (6) banking or thrift institution	<input type="checkbox"/> (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: TFT Advisors, LLC	SEC File Number: 801-	Date: 09/15/2009
---------------------------------	--------------------------	---------------------

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.

Investment Advisory Services: Maureen Verduyn and Peggy Lombardo, Managing Members, review all accounts in the GFWM, Matrix, GFAM, and Efficient Programs on a quarterly basis.

Consulting/Financial Planning Services: Where applicable, a Managing Member will review the account as contracted for by the client.

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

Investment Advisory Services: Clients receive account statements directly from the program provider on at least a quarterly basis.

Consulting/Financial Planning Services: Clients will receive reports as specified in their agreement with TFT Advisors.

Applicant: TFT Advisors, LLC	SEC File Number: 801-	Date: 09/15/2009
---------------------------------	--------------------------	---------------------

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; 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:	SEC File Number:	Date:
TFT Advisors, LLC	801-	09/15/2009

(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: TFT Advisors, LLC	IRS Empl. Ident. No.:
--	-----------------------

Item of Form (identify)	Answer
1.D.	<p>ADVISORY SERVICES AND FEES</p> <p><u>Investment Advisory Services</u> TFT Advisors offers advisory services as an investment adviser, investment professional, and/or solicitor through several managed account programs. These programs provide for the active management of Client portfolios by the program provider or separate account managers who are licensed investment advisers. TFT Advisors will periodically review the Client’s portfolios managed under these programs. TFT Advisors’ investment advisory services are offered exclusively through these third-party programs. TFT Advisors is independent of and is not affiliated with any of the third-party program providers.</p> <p><i>Genworth Financial Wealth Management (formerly AssetMark):</i> TFT Advisors offers non-discretionary investment advisory services through the program provider Genworth Financial Wealth Management, Inc. (“GFWM”), a registered investment adviser. Through this Program, TFT Advisors advises Client as to the selection of independent investment managers or the selection of asset allocation models developed and managed by independent investment management firms. These independent investment management firms are licensed or registered as investment advisers.</p> <p>A Client participating in the GFWM Program will pay TFT Advisors and the investment managers a combined account fee (the “Fee”) according to the fee schedule and terms provided in the Program’s client services agreement. The annual Fee ranges from 0.45% to 2.0% depending on the total assets managed and the investment managers selected. The exact Fee schedule will be detailed in the client services agreement. The Fee is payable quarterly in advance and is generally debited directly from the clients account by GFWM. Clients will pay an initial quarterly Fee in an amount equal to one quarter of the annual Fee based on the amounts invested initially and will pay an initial quarterly Fee on any additions for the quarter in which those amounts are added to the account. Clients may terminate their account at any time without penalty. In the event the account is terminated during a calendar quarter, GFWM will return to the Client a pro-rated portion of the pre-paid quarterly fee within 30 days of the effective date of termination. Clients should review the client services agreement and GFWM disclosure document carefully for all terms of the Program.</p> <p>If a client’s account includes mutual funds, ETFs and/or variable annuity sub-accounts, the Client may also bear certain charges imposed by third parties other than TFT Advisors in connection with investments made through the Client’s account, including but not limited to mutual fund 12(b)-1 distribution fees, servicing fees, sub-accounting fees, management fees, mortality, expense risk, administration fees and IRA and Qualified Retirement Plan fees. The fees paid to fund managers by mutual funds, ETFs or variable annuity sub-accounts are deducted from each fund’s net asset value and as such shall be an indirect expense of the Client’s account. The fees charged to the Client’s account may be higher than fees charged by other investment advisers for similar services. Mutual funds, ETFs and/or variable annuities can be purchased directly without participation in the Program. In that case, the Client would not receive the services provided by TFT Advisors which are designed, among other things, to assist the Client in determining which mutual funds, ETFs and/or variable annuities are most appropriate to each Client's financial condition and objectives.</p> <p><i>Matrix:</i> TFT Advisors offers investment advisory services through two programs offered by the Matrix Division (“Matrix”) of Abundance Technologies, Inc. (“Abundance”), a registered investment adviser. TFT Advisors is a Co-Adviser in the program providing Client relationship and suitability services and Matrix provides discretionary investment management services to the Client.</p> <p>Clients may elect to participate in either: (1) the Abundance Fund Platform in which Matrix primarily invests the assets of the Client in shares of any one or a combination of series of the “Abundance Technologies, Inc. Family of Funds of the RBB Funds, Inc.” (“Abundance Fund”), a no-load mutual fund affiliated with Abundance. Or: (2) Private Account Asset Allocation in which Matrix primarily invests in the assets in the Client’s account in share of various no-load mutual funds or ETFs.</p>

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
TFT Advisors, LLC	801-	09/15/2009

(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: TFT Advisors, LLC	IRS Empl. Ident. No.:
--	-----------------------

Item of Form (identify)	Answer
I.D. continued	<p>TFT Advisors will assist the Client in completing the program questionnaire, identifying reasonable restrictions, determining a suitable investment objective, selecting the desired program, and completing the investment policy statement which will govern how Matrix will manage the Client's assets. Since Matrix will invest the Client's assets on the basis of the Client's responses and information given to TFT Advisors, it is important that the Client respond accurately to all questions and inform TFT Advisors promptly of any significant changes in the Client's financial circumstances, risk tolerance, or investment objectives.</p> <p>If the Client selects the Abundance Fund Platform the Client will pay TFT Advisors an advisory fee, outside of the Abundance Fund, as set forth in the following schedule:</p> <p>1.00% to 1.4% on the first \$500,000 0.50% to 1.00% on the next \$500,000 0.40% to 0.75% on the next \$3,000,000, and 0.25% to 0.50% on the remainder over \$4,000,000.</p> <p>The specific fee each Client will pay will be set forth in the investment management agreement. TFT Advisors at its discretion may on occasion discount the fee in the above fee schedule.</p> <p>By agreement with Abundance, the maximum total fee TFT Advisors may collect is 140 basis points (1.40%). The advisory fees are charged quarterly in advance. These fees compensate TFT Advisors for maintaining the client relationship, ensuring that the Questionnaire remains up-to-date, and responding to the Client's inquiries. No part of these fees are retained by Abundance. Within the range set forth above, the fees TFT Advisors charges the Client may be greater than the fees that other co-advisers may charge their clients for access to the same funds.</p> <p>The Client will not pay Abundance any advisory or other fees directly under this program, but Abundance receives fees of .50% on the average daily net assets of each series of the Abundance Fund. Assets invested in shares of the Abundance Fund series are subject to embedded advisory and other fees and expenses, as set forth in the prospectus. These fees are paid by the series, but the Client ultimately bears the asset-based share of the fees and expenses of each Abundance Fund series in which the Client's account is invested, including brokerage fees and operating expenses. No sales loads are paid to Abundance or any other parties with respect to Abundance Fund investments.</p> <p>If the Client selects the Private Account Asset Allocation program the Client will pay to Abundance advisory fees, as described on the following schedule:</p> <p>2% of the first \$500,000, 1% of the next \$500,000, 0.75% of the next \$3,000,00 and 0.50% of the remainder over \$4,000,000.</p> <p>Lower fees for comparable services may be available from other sources. Abundance has agreed to compensate TFT Advisors in an amount up to 70% of the fees paid to Abundance by Client accounts referred by TFT Advisors as long as the Client account remains a Client account of Abundance and TFT Advisors and as long as TFT Advisors has a co-advisory agreement with Abundance. As set forth in Abundance's Form ADV Part II, Abundance's maximum annual fee for Private Account Asset Allocation advisory services is 2.0%. Clients who have been referred to Abundance by other co-advisers may pay lower or higher fees than the Client pays depending upon the size of the accounts, whether fees were negotiated and other factors. However, the percentage of Abundance's advisory fee that Abundance pays TFT Advisors for referring a Client to Abundance's Private Account Asset Allocation program does not vary depending upon the fee charged to the Client. Rather, the percentage of Abundance's fee that Adviser pays TFT Advisors increases as the amount of Client assets referred to Abundance by TFT Advisors increases.</p> <p>As additional compensation to TFT Advisors, Abundance manages the accounts of TFT Advisors without</p>

Schedule F of Form ADV

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
TFT Advisors, LLC	801-	09/15/2009

(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: TFT Advisors, LLC	IRS Empl. Ident. No.:
--	-----------------------

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

I.D. continued	<p>charge and the accounts of the immediate family of TFT Advisors for a reduced fee, for associated persons of TFT Advisors who have referred at least \$20 million in Client assets to Abundance.</p> <p>Typically the advisory fees are debited automatically from the Client's account by Abundance and paid to TFT Advisors. Fees shall be calculated based upon the fair market value of the account as determined by Abundance as of the last business day of each prior billing period. Fees will be prorated for any additions to, or withdrawals from, Client's account, within thirty (30) days of such addition or withdrawal. The initial fee shall be based on the Account's value at inception of management and shall be prorated for the number of days in the billing period that the Account is under management by Matrix. Fees are payable quarterly in advance in increments of one fourth the annual percentage.</p> <p>The advisory fees charged under these programs will not be reduced by any fund-level fees (including redemption fees), unless required by law. Investment in shares of open-end mutual funds are subject to investment advisory, administration, transfer agency, distribution, shareholder service (some of which may be paid to Abundance) and other fund-level expenses that are paid by the fund and the Client, indirectly, as a fund shareholder.</p> <p>Assets invested in mutual fund shares (other than the Abundance Funds) or other commingled investment vehicles such as variable annuities or money market funds, are included in calculating the value of the Client's account for purposes of computing fees under the Private Account Asset Allocation program, and the same assets are also subject to additional advisory and other fees and expenses, as set forth in the prospectuses of those mutual funds or other commingled investments. These fees are paid by the investment vehicle, but ultimately borne by investors. Clients, in effect, pay two sets of advisory fees, one to Abundance and another to the managers of each mutual fund or commingled investment vehicle.</p> <p>The agreement may be terminated by Client or Abundance within 5 business days of entering into the agreement, or at any time thereafter by Client or Abundance upon thirty (30) days prior written notice. Fees will be pro-rated to the date of termination. Any unearned fees which have been prepaid at the date of termination or upon a withdrawal will be refunded.</p> <p>The investment and service options and full details of the program are outlined in the program brochure, provided to the Client at the outset of the relationship, and in the investment management agreement the client enters into with Abundance and TFT Advisors. Clients should review the investment management agreement and Abundance disclosure document carefully for all terms of the program.</p> <p>At its sole discretion TFT may advise on 529 Plans for clients, who have other assets managed or placed with third party managers through TFT, for no additional charge.</p> <p><i>Other Programs:</i> TFT Advisors, or its associated persons, as an investment professional acts as a solicitor for Genworth Financial Asset Management, Inc. ("GFAM") and Efficient Advisors, LLC ("Efficient") (each a "Referred Advisor"). Referred Advisor provides Clients with asset management services and Client pays an advisory fee to Referred Advisor according to the account agreement between Client and Referred Advisor. TFT Advisors or associated persons receive a portion of that fee from Referred Advisor. Client receives and signs a disclosure statement, which specifies the fee schedule and the compensation to TFT Advisors or associated persons. (See also disclosures under Item 7.C. below related to Efficient.)</p> <p><u>Coaching Services</u></p> <p>TFT Advisors provides coaching services in a group setting on a quarterly basis to provide education on the economic markets and investing. This service is beneficial to Clients who do not have portfolios that can be managed by TFT Advisors, such as 401(k) accounts, and who seek further guidance on managing their own accounts. TFT Advisors will not provide specific investment recommendations or provide investment advice specific to Client circumstances. Clients who desire investment advice specific to their situation should engage TFT Advisors for consulting or asset management services. The fees for Coaching Services are \$600</p>
----------------	---

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant: TFT Advisors, LLC	SEC File Number: 801-	Date: 09/15/2009
---------------------------------	--------------------------	---------------------

(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: TFT Advisors, LLC	IRS Empl. Ident. No.:
	Item of Form (identify)	Answer
	1.D. continued	per person per quarter, payable quarterly in advance, for a term of one year. TFT Advisors may discount the Coaching Services fees at its discretion. <u>Consulting Services</u> TFT Advisors will provide analysis and consulting services on an hourly or fixed fee basis. Consulting Services may take the form of one-on-one advice concerning investment matters or other advice as contracted by Client. While TFT Advisors does not prepare financial plans for clients, Consulting Services may include advice on such individual issues as retirement planning, estate planning, risk management, education funding, and other planning related services. Fees for Consulting Services are charged at a rate of \$250 per hour per Associated person providing services, to be paid at the time services are provided. Alternatively, TFT Advisors may offer Consulting Services on a project fee basis. The project fee is based primarily on the rate of \$250 per hour and an estimate of the number of hours to complete the project and will be quoted and payable at the time of engagement.
	3.L. and 4.A(5), 4.B(8), & 4.C(7)	TYPES OF INVESTMENTS METHODS OF ANALYSIS, SOURCES OF INFORMATION, AND INVESTMENT STRATEGIES TFT Advisors offers advice as to the selection of independent investment advisers, coaching services providing general education on markets and investing, and investment related consulting services. TFT Advisors provides advice to clients on but does not invest for clients in the types of securities listed under Item 3 on page 3 of this Form ADV Part II.
	5.	EDUCATION AND BUSINESS STANDARDS All individuals who give investment advice on behalf of TFT Advisors must have earned a 4-year college degree, be credentialed as a Certified Financial Planner, and have investment advisory experience in excess of 5 years.
	6.	EDUCATION AND BUSINESS BACKGROUND Maureen Verduyn , CFP; Managing Member, b. 1963 <i>Education:</i> M.Ed.; University of San Diego, 1996 B.A.; University of North Carolina, Wilmington, 1992 Certified Financial Planner, 1987 <i>Business Background:</i> The Financial Team, Inc., Principal, 1998 to present Lighthouse Capital Corporation, Registered Representative, 2007 to 2009 QA3 Financial Corp, Registered Representative and Investment Adviser Representative, 1998 to 2006 Margaret "Peggy" Lombardo , CFP, EA, Managing Member, b. 1947 <i>Education:</i> B.A.; University of Vermont, 1968 Certified Financial Planner, 1986 <i>Business Background:</i> The Financial Team, Inc., Principal, 1998 to present Lighthouse Capital Corporation, Registered Representative, 2006 to 2009 QA3 Financial Corp, Registered Representative and Investment Adviser Representative, 1998 to 2006

Schedule F of Form ADV

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
TFT Advisors, LLC	801-	09/15/2009

(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: TFT Advisors, LLC	IRS Empl. Ident. No.:
--	-----------------------

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

7.C. and 8.C.(11)

**OTHER BUSINESS ACTIVITIES
OTHER FINANCIAL INDUSTRY AFFILIATIONS**

TFT Advisors is under common ownership with The Financial Team, Inc., a licensed California real estate broker. Associated Persons of TFT Advisors may in their individual capacities recommend that Client purchase products or services that are sold through The Financial Team, Inc. If Client elects to purchase products or services through The Financial Team, Inc., that entity may receive commissions or fees in connection with the purchase. TFT Advisors therefore has a conflict of interest in recommending products or services that are sold through The Financial Team, Inc. Client is under no obligation to act on the investment recommendations made by TFT Advisors. If Client elects to act on any of the recommendations made by TFT Advisors, Client is under no obligation to effect the transaction through TFT Advisors or any of its Associated Persons who are employed as an agent with TFT Advisors.

Additionally, the managing members of TFT Advisors are actively involved in the management of The Financial Team, Inc. The businesses are complementary and the managing members devote as much time as needed to each business.

Maureen Verduyn is on the Board of Directors of Efficient Advisors, LLC (“Efficient”). She is not compensated for this position. TFT Advisors, or its associated persons, as an investment professional acts as a solicitor for Efficient.

9.D., & 9.E.

PARTICIPATION OR INTERESTS IN CLIENT TRANSACTIONS

TFT Advisors may recommend that clients invest in Trust Deeds. Associated Persons of TFT may also be investors in the same Trust Deeds. While the Trust Deeds are not securities, clients are hereby advised that Associated Persons of TFT Advisors may invest in the same 1st Trust Deeds as are recommended to clients and those same Associated Persons may earn commissions on the investment by clients.

At times, Associated Persons of TFT Advisors may hold, buy, or sell positions in securities that may also be recommended to clients. However, at no time will TFT Advisors or any related party receive preferential treatment over clients.

TFT Advisors is and shall continue to be in total compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988 and the applicable rules of state and federal securities laws, including the prohibition of insider trading. TFT Advisors maintains the required personal securities transaction records for Associated Persons.

10.

CONDITIONS FOR MANAGING ACCOUNTS

The minimum investment required by an individual investor client seeking investment advisory services is generally \$50,000. Accounts below this minimum may be negotiable and accepted on an individual basis at TFT Advisors’ discretion.

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
TFT Advisors, LLC	801-	09/15/2009

(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: TFT Advisors, LLC	IRS Empl. Ident. No.:
Item of Form (identify)	Answer
Miscellaneous	<p style="text-align: center;">TFT Advisors, LLC Client Privacy Notice</p> <p>Your relationship with TFT Advisors, LLC is based on trust and confidence.</p> <p>To fulfill its responsibilities to you, TFT Advisors, LLC requires that you provide current and accurate financial and personal information.</p> <p>TFT Advisors, LLC will protect the information you have provided in a manner that is safe, secure and professional.</p> <p>TFT Advisors, LLC and its employees are committed to protecting your privacy and to safeguarding that information.</p> <p style="text-align: center;">Categories of Information We Collect</p> <p>We may collect the following kinds of confidential personal information about you:</p> <ul style="list-style-type: none"> • Information we receive from you on applications or other forms, such as your name, address, assets, phone number, social security number, occupation, assets, income and other financial and family information; • Information about your transactions with us, our affiliates or with brokerages, banks and custodians with whom you hold investment or cash accounts. This information includes account numbers, holdings, balances, transaction history and other financial and investment activities. <p style="text-align: center;">Sharing Nonpublic Personal and Financial Information</p> <p>TFT Advisors, LLC is committed to the protection and privacy of its customer's and consumer's personal and financial information. TFT Advisors, LLC will not share such information with any non-affiliated third party except:</p> <ul style="list-style-type: none"> • When necessary to complete a transaction in the account, such as with the clearing firm or account custodians; • When required to maintain or service the account; • To resolve customer disputes; • When requested by a fiduciary or beneficiary on the account; • When required by our attorneys or accountants; • When required by a regulatory agency, or for other reasons required or permitted by law; • In connection with a sale or merger of TFT Advisors, LLC's business; • In any circumstance that has the customer's instruction or consent. <p style="text-align: center;">Protection of Personal Information</p> <p>We restrict access to your personal and account information to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to guard your personal information.</p>