

George J. Slezak
Registered Investment Advisor

Form ADV Part 2 – Disclosure Brochure

Effective: December 15, 2011

Item 1

This Brochure provides information about the qualifications and business practices of George J. Slezak, Registered Investment Advisor.

If you have any questions about the contents of this Brochure, please contact George at (239) 947-9131

George J. Slezak is a registered investment Advisor registered with the State of Florida. 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. Registration of an Investment Advisor does not imply any specific level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Additional information about George Slezak is available on the SEC's website at <http://advisorinfo.sec.gov>.

George J. Slezak, Registered Investment Advisor.
CRD No: 135413
23371 Olde Meadowbrook Circle
Bonita Springs, FL 34134
Phone: (239) 947-9131
<http://www.georgeslezak.com>

Item 2 - Material Changes

There are no material differences in this filing compared to the previous filing Form ADV Part 2 filing.

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the "Advisers Act"). The amendments are designed to require a registered investment Advisor to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor's business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts, Part 2A and Part 2B. Part 2A of the new Form (the "Firm Brochure") provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. Part 2B of the new Form (the "Brochure Supplement") requires an Advisor to provide information about certain advisory personnel. George Slezak strives to provide you with the complete and accurate information at all times. We encourage all current and prospective investors to read this Brochure and discuss any questions. you

Initial Filing and annual updating amendment.

George J Slezak is an existing registered investment advisor. This filing is the required annual updating amendment.

Future Changes

From time to time, George J Slezak may amend this Firm Brochure to reflect changes in business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Firm Brochure or this summary of Material Changes shall be provided to each Client annually or if a material change is made. At any time, you may view the current Firm Brochure on-line at the SEC's Investment Advisor Public Disclosure

website at <http://advisorinfo.sec.gov>.

To review the firm information for George J. Slezak,

- Click Investment Advisor Search in the left navigation menu and enter.
- Select the option for Investment Advisor Firm and enter 135413 (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- ADV Part 1 will be displayed.
- This will provide access to Form ADV 1 and 2A.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions.
- On the left navigation, Form ADV Part 2A is located near the bottom.

You may also request a copy of this Firm Brochure at any time, by contacting George (239) 947 9131

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Item 4 – Advisory Services

A. Firm Information

George J. Slezak is a sole proprietor registered investment advisor registered with the State of Florida since 2005.

B. Advisory Services Offered

Advisor manages investments in stock index mutual funds that allow market timing, Commodity Limited Partnerships and Mutual Funds that allow market timing between managed and unmanaged underlying commodity investments, and exchange traded funds that represent general stock index investments and commodity indexed investments.

C. No tailored advisory services

George J. Slezak manages investment funds under a single market timing investment plan. Other than limiting funds managed for the client to “speculative funds,” ie generally less than ten percent of the client’s assets, the Advisor does not tailor advisory services to the individual client. Prior to rendering investment management services, George J. Slezak will ascertain, in conjunction with the Client, that the Client’s financial situation, risk tolerance, and investment objective are consistent with assigning a portion of the client’s assets to a speculative market timing investment program. All client accounts are handled in the same manner having similar positions and transactions. Client accounts that might request restrictions on investing in certain securities or types of securities are not accepted.

Prior to engaging George J. Slezak to provide investment advisory services, the Client is required to enter into an investment management agreement with George J. Slezak acknowledging that all funds placed under management of the advisor are speculative funds and setting forth the terms and conditions of the engagement and the services to be provided.

D. The advisor does not participate in wrap fee programs.

E. George J. Slezak does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the “Custodian”) to safeguard Client assets and authorize George J. Slezak to direct trades to this Custodian as agreed in the Investment Advisory Agreement. Further, George J. Slezak does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

George J. Slezak directs trades to the Custodian on a discretionary basis. As of December 15, 2011 the Advisor has approximately \$3,200,000 of client assets under management.

Item 5 - Fees and Compensation

A. Compensation for advisory services.

Advisor charges an annual fee of 2.5% of assets under management payable as 1/12 of 2.5% of the calendar month ending balance or prorated on a daily basis. Fees are not negotiable.

Advisor charges an hourly rate of \$250 (in minimum ½ hour increments) to individuals that request information on market timing the stock market and commodity markets but do not place funds under the management of the advisor.

B. Advisor fees are deducted from the client accounts. Fees are not charged in advance. Currently, all US person Client accounts are held at Rydex-SGI and have fees calculated and charged after the end of the calendar month. Rydex-SGI does not accept non US person accounts. Non US person’s client accounts are currently held at Interactive Brokers and have fees prorated and deducted daily. All

securities held in a portfolio managed by George J. Slezak will be independently valued by the Custodian. George J. Slezak will not have the authority or responsibility to value portfolio securities.

Clients will receive independent statements from the Custodian no less frequently than quarterly. It is the responsibility of the client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

C. Other fees

Rydex- SGI might pay the Advisor an administrative fee related to the Client's account investment in particular funds. Such fee is not greater than an annual rate of $\frac{1}{4}$ of 1% and is not reflected in calculating the Advisor's fee for services.

Accounts held at Rydex-SGI do not incur brokerage transaction fees. Accounts held at Interactive Brokers incur brokerage and other transaction costs. Clients that have an account at Interactive Brokers should review Item 12 on Brokerage practices.

D. Client fees are not charged in advance.

E. Asset based service fees.

Rydex- SGI might pay the Advisor an administrative fee related to the Client's account investment in particular funds. Such fee is not greater than an annualized $\frac{1}{4}$ of 1% of the amounts in such particular funds. This fee is not considered material by the advisor and is not considered a conflict of interest. This fee is disclosed in the advisory agreement.

Accounts held at Rydex-SGI invest in no load mutual funds.

The advisor does not make individual product recommendations outside of his managed account program.

The advisor does not receive commissions or markups on the client accounts.

Item 6 – Performance-Based Fees

George J. Slezak does not charge performance-based fees for its investment advisory services. The fees charged by George J. Slezak are as described in Item 5 – Fees and Compensation above, and are not based upon the capital appreciation of the funds or securities held by any Client.

Side-by-side Management – George J. Slezak does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options for its Clients.

Item 7 – Types of Clients

George J. Slezak may provide services to a variety of client types. Clients may include:

- Individuals, Personal Trusts and Estates – Private investors, investing personal assets
- Charitable Organizations – Non-profit organizations that manage a pool of assets, and distribute fund according to a mandate or mission.

The relative percentage each client type currently represents is available on George J. Slezak's Form ADV Part 1. The actual mix of types of Clients changes over time based upon market conditions, business plans and other factors. George J. Slezak does not specialize in, or actively seek, any given client type. George J. Slezak is committed to providing services to qualified investors, regardless of legal or corporate status. The advisor does not have a minimum account size.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

George J. Slezak draws all necessary information for developing its investment models and strategies from his own proprietary research. In his research he considers

- Fundamental Analysis
- Economic Analysis
- Technical Stock Market Analysis
- Reports from the Commodity Futures Trading Commission on the Commitments of Traders.

Investing in securities involves risk of loss that clients should be prepared to bear.

B. The advisor follows a market timing strategy where the goal is to be profitable in both rising and falling markets by having accounts hold long positions or short positions. Such positions might include funds that represent leveraged positions. The risks of loss of a market timing strategy could be considerable and the advisor requires the client to only place speculative funds under his management.

C. The advisor primarily has the client funds invested in stock market index mutual funds. Such funds will represent either a long position in the market or a short position in the market. Such funds may use leverage to increase the exposure to two times the index, long or short. The use of long and short index funds, with leverage involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

George J. Slezak and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Background information is available on the Investment Advisor Public Disclosure website at <http://advisorinfo.sec.gov>.

To review the firm information for George J. Slezak, click Investment Advisor Search in the left navigation menu and enter, select the option for Investment Advisor Firm and enter 135413 (our firm's CRD number) in the field labeled "Firm IARD/CRD Number:". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

There are no legal, regulatory or disciplinary events involving George J. Slezak.

Item 10 – Other Financial Activities and Affiliations

A. George J. Slezak does not have any affiliations with a broker-dealer.

B. George J. Slezak is registered as a Guaranteed Introducing Broker with the Pencon Futures, a Futures Clearing Merchant. The advisor's registration as a Introducing Broker can be reviewed at the National Futures Association web site searching broker/firm registration under NFA ID: 0242273 <http://www.nfa.futures.org/>. George Slezak is a registered floor broker under his permit membership at the Chicago Board of Trade and registered as an associated person of his Introducing Broker business. You can view his registrations as a commodity broker at the National Futures Association web site searching broker/firm registration under NFA ID: 0085620 <http://www.nfa.futures.org/>

C. There is no relationship or arrangement that is material to your advisory business or to your *clients* that you or any of your *management persons* have with any *related person* listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor
5. banking or thrift institution
6. accountant or accounting firm
7. lawyer or law firm
8. insurance company or agency
9. pension consultant
10. real estate broker or dealer
11. sponsor or syndicator of limited partnerships.

D. The advisor does not recommend or select other investment advisers for clients

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

A. George J. Slezak has implemented a Code of Ethics that defines our fiduciary commitment to each Client. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. George J. Slezak owes a duty of loyalty, fairness and good faith towards each Client. It is the obligation of George J. Slezak to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures.

George J. Slezak has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (239) 947-9131

B. Personal Trading and Conflicts of Interest

George J. Slezak does not have a material financial interest in any investment recommended to clients.

C. The advisor and related persons have investment accounts that make identical investments as the client accounts. There is no conflict of interest because the handling mutual fund company processes all transactions equally at identical times.

D. The advisor and related persons have investment accounts that make identical investments as the client accounts. There is no conflict of interest because the handling mutual fund company processes all transactions equally at identical times.

George J. Slezak or related persons may have an interest or position in certain securities, which may also be recommended to you. At no time, will George J. Slezak or any associated person of George J. Slezak, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

George J. Slezak does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize George J. Slezak to direct trades to this Custodian as agreed in the Investment Advisory Agreement. Further, George J. Slezak does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

George J Slezak, Registered Investment Advisor
SEC File number 801-135413
Form ADV Part 2A: Firm Brochure
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George J. Slezak may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and procedures for order entry, and no fee or restriction for active mutual fund investment and redemption. George J. Slezak does **not** receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

George J. Slezak recommends to US Clients that they established their brokerage account[s] at Rydex-SGI, and non US persons at Interactive Brokers.

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. George J. Slezak does not participate in soft dollar programs sponsored or offered by any broker-dealer.

2. Brokerage Referrals - George J. Slezak does not receive any compensation from any entity in connection with the recommendation for establishing a brokerage account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where George J. Slezak will place trades within the established account[s] at the Custodian designated by the Client. Further all Client accounts are traded within their respective brokerage account[s]. George J. Slezak will not engage in any principal transactions (i.e., trade of any security from or to George J. Slezak's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, George J. Slezak will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. George J. Slezak will execute its transactions through an unaffiliated broker-dealer selected by the Client. George J. Slezak may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer/mutual fund company for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Investment Advisory Clients – Accounts are monitored on an ongoing basis by George J. Slezak for adherence to investment strategy. Investment management and supervision over the securities contained in the Client's portfolio are performed in an ongoing basis by George J. Slezak, as applicable.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A, each Client account shall be reviewed at least quarterly. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify George J. Slezak if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Trustee or Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor also prepares an annual review of the managed accounts.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by George J. Slezak

George J. Slezak may enter into referral agreements with third-party advisors under which the third-party advisor pays a fee to George J. Slezak for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended. This fee percentage may be up to 50% of the total fees generated by the Client. Clients referred to third party advisors will not be charged an amount in addition to the George J. Slezak management fee, nor will they be charged a higher management fee than other clients to cover the cost of solicitation of their accounts.

B. Client Referrals from Solicitors

The Advisor may pay compensation to Broker-Dealers or Investment Advisers for referral services a portion of the fees charged by the Applicant in an amount no greater 1.00% (100 basis points) of the assets placed under management with the Investment Adviser. (Such amount is 40 percent (40%) of the investment management fee that Applicant Investment Adviser charges the client.) No payment will be paid to a referring Broker-Dealer or referring Investment Adviser without delivery to Applicant Investment Adviser of a client signed and dated acknowledgement of receipt of a Broker-Dealer Investment Adviser Solicitor Disclosure Statement complying with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, regarding the payment of solicitation fees to an unaffiliated person for referring or soliciting prospective clients on behalf of the registered investment adviser.

The payment of a solicitation fee will not affect the amount being charged by the Applicant Investment Adviser. The solicitation fee shall be paid solely from the Applicant Investment Adviser's standard investment management fee and shall not result in any additional charge to the client. The Investment Adviser's fee would be the same, regardless of whether a solicitation fee is paid.

George J. Slezak does not presently pay any solicitors to refer business to George J. Slezak. George J. Slezak may receive a Client referral from a third-party. No compensation is given for the referral. All referrals are a professional courtesy and in the interest of the Client.

Item 15 – Custody

George J. Slezak does not accept or maintain custody of any Client accounts. All Clients must place their assets in a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct George J. Slezak to utilize that custodian for the Client's security transactions. For more information custodians and brokerage practices, see Item 12 - Brokerage Practices.

While George J. Slezak does not have custody of Client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds Client assets. In certain jurisdictions this may be deemed constructive custody. Prior to permitting direct debit of fees each Client provides written authorization permitting fees be made direct from the custodian. Unless the custodian, under agreement with the client, calculates the fee daily, George J. Slezak will send the custodian a monthly bill showing the amount of the fee and the way in which it was calculated. The custodian sends every Client an account statement not less than quarterly showing all account activity, including the amounts disbursed from the account to George J. Slezak.

Item 16 – Investment Discretion

Discretionary Portfolio Management – George J. Slezak generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Management Agreement containing all applicable limitations to such authority. All discretionary trades made by George J. Slezak will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

George J. Slezak does not accept proxy voting responsibility for any Client. Therefore, although George J. Slezak may provide investment advisory services relative to Client investment assets, George J. Slezak Clients maintain exclusive responsibility for:

(1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. George J. Slezak and/or the Client shall correspondingly instruct the Custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

Item 18 – Financial Information

Neither George J. Slezak, nor its management has any adverse financial situations that would reasonably impair the ability of George J. Slezak to meet all obligations to its Clients. Neither George J. Slezak, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. George J. Slezak is not required to deliver a balance sheet along with this brochure as the firm does not collect advance fees more than \$500 per client for services to be performed six months or more in advance. George J. Slezak charges fees on a monthly or daily basis as of the end of the period. George J. Slezak does not charge in advance for services. Please see Item 5 - Fees and Compensation for additional information.

Item 19 – Requirements for State-Registered Advisors

The formal education and business background of George J. Slezak and other business activities and the amount of time spent in those activities is presented in Form ADV Part 2B – Individual Disclosure Brochure For George J. Slezak .

Privacy Policy

Effective: December 15, 2011

Our Commitment to You George J. Slezak is committed to safeguarding the use of your personal information that we have as your Investment Advisor. George J. Slezak (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust. We do not sell your non-public personal information to anyone. Nor does George J. Slezak provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

- Name and address • Assets
- E-mail address • Income
- Phone number • Account balance
- Social security or taxpayer identification number
- Investment activity
- Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That George J. Slezak Shares

George J. Slezak works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy George J. Slezak's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients

George J. Slezak does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (239) 947-9131