

**FORM ADV**

**Uniform Application for Investment Adviser Registration**

**Part II - Page 1**

OMB APPROVAL	
OMB Number:	3235-0049
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Name of Investment Adviser:					
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone number: ( )

**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.**

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**(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 type="checkbox"/> | (1) Provides investment supervisory services .....  | _____ | % |
| <input type="checkbox"/> | (2) Manages investment advisory accounts not involving investment supervisory services .....  | _____ | % |
| <input type="checkbox"/> | (3) Furnishes investment advice through consultations not included in either service described above ....   | _____ | % |
| <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 type="checkbox"/> | (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities .....   | _____ | % |
| <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 type="checkbox"/> (1) A percentage of assets under management      | <input type="checkbox"/> (4) Subscription fees |
| <input 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 type="checkbox"/> A. Individuals                      | <input 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 type="checkbox"/> D. Pension and profit sharing plans |   |

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

**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |   |   |
|---|---|
| <input type="checkbox"/> A. Equity securities                                       | <input type="checkbox"/> H. United States government securities     |
| <input type="checkbox"/> (1) exchange-listed securities                             | <input type="checkbox"/> I. Options contracts on:                   |
| <input type="checkbox"/> (2) securities traded over-the-counter                     | <input type="checkbox"/> (1) securities                             |
| <input type="checkbox"/> (3) foreign issuers  | <input type="checkbox"/> (2) commodities                            |
| <input type="checkbox"/> B. Warrants  | <input type="checkbox"/> J. Futures contracts on:                   |
| <input type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles                              |
| <input type="checkbox"/> D. Commercial paper  | <input type="checkbox"/> (2) intangibles                            |
| <input type="checkbox"/> E. Certificates of deposit                                 | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> F. Municipal securities                                    | <input type="checkbox"/> (1) real estate                            |
| <input type="checkbox"/> G. Investment company securities:                          | <input type="checkbox"/> (2) oil and gas interests                  |
| <input type="checkbox"/> (1) variable life insurance                                | <input type="checkbox"/> (3) other (explain on Schedule F)          |
| <input type="checkbox"/> (2) variable annuities                                     | <input type="checkbox"/> L. Other (explain on Schedule F)           |
| <input 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 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 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<br>(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions   |
| (2) <input type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input type="checkbox"/> Option writing, including covered options,<br>uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days)                 | (7) <input type="checkbox"/> Other (explain on Schedule F)   |
| (4) <input type="checkbox"/> Short sales  |  |

**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
- year of birth
- formal education after high school
- business background for the preceding five years

**7. Other Business Activities.** (check those that apply)

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
  - (1) broker-dealer
  - (2) investment company
  - (3) other investment adviser
  - (4) financial planning firm
  - (5) commodity pool operator, commodity trading adviser or futures commission merchant
  - (6) banking or thrift institution
  - (7) accounting firm
  - (8) law firm
  - (9) insurance company or agency
  - (10) pension consultant
  - (11) real estate broker or dealer
  - (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? .  Yes  No

(If yes, describe on Schedule F the partnerships and what they invest in.)

**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.

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

**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 type="checkbox"/> |
| (2) amount of the securities to be bought or sold? ..... | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) broker or dealer to be used? .....                   | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (4) commission rates paid? .....                         | Yes <input 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 product 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 <input type="checkbox"/> | No <input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(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

**Schedule F of  
Form ADV  
Continuation Sheet for Form ADV Part II**

Applicant: <b>HERON FINANCIAL GROUP, LLC</b>	SEC File Number: <b>801- 68679</b>	Date: <b>01/17/2008</b>
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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: <b>HERON FINANCIAL GROUP, LLC</b>		IRS Empl. Ident. No.: <b>64-0963720</b>
Item of Form (identify)	Answer	
1D	<p>We furnish investment management services to individuals, pension and profit-sharing plans, and charitable organizations. Our services include the management of equity, fixed-income, and balanced portfolios, as well as other specialty investment portfolios. We base our investment advice on the particular needs, investment objectives, and investment guidelines of each of our clients. Subject to the foregoing, we generally manage the assets of our clients on a fully discretionary basis.</p> <p>We were organized as a limited liability company under the laws of the State of New York in June 2007 and have offices in New York, New York. We are registered as an investment advisor with the United States Securities and Exchange Commission.</p> <p><b>Fees</b></p> <p>We generally are paid a management fee equal to one percent on an annualized basis with respect to the first \$2 million in assets under management in a client account. We generally are paid a management fee equal to 0.75 percent on an annualized basis with respect to assets under management in a client account that exceed \$2 million.</p> <p>For accounts that are participating in the manager-of-managers program, we generally are paid a management fee equal 0.20 percent on an annualized basis. In addition, we generally are paid an administrative fee of \$250 per hour in lieu of a management fee for client accounts that are invested primarily in mutual funds and money-market funds.</p> <p>Typically we charge fees monthly in arrears. With the exception of the administrative fee, we compute our fees based on the market value of the securities in the account or, in the absence of a readily ascertainable market value, based on the fair value of the securities in the account as we determine fair value in good faith. Marketable securities are marked to market as of 4:00 on the last business day of the month.</p>	

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

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>HERON FINANCIAL GROUP, LLC</b>		IRS Empl. Ident. No.: <b>64-0963720</b>
Item of Form (identify)	Answer	
3L	<p>Our fees may be negotiated based on the size and type of investments involved. A variance in fees may be appropriate in cases in which a client requests special account structures or has atypical objectives. We reserve the right to change, reduce, or waive our fees in our discretion and to increase or decrease the minimum account size that we accept.</p> <p>Some client accounts may include exchange-traded funds and mutual funds to assist in providing overall liquidity. These funds may charge management fees and expenses in addition to the fees that we charge.</p> <p>Our investment strategy includes the objective of a broad degree of issuer diversification for client accounts that are primarily invested in equity securities. Generally, these clients authorize us to invest their assets primarily in publicly traded securities and shares of mutual funds and money-market funds. Our clients may authorize us to invest their assets in, among other things, common stock, preferred stock, partnership interests, limited liability company interests, debt securities, and municipal securities.</p>	
4A, 4B	<p>We use information, reports, and data from various sources, but the investment decisions that we make on behalf of our clients are based primarily on our own internal research and analysis, as well as the experience of our key personnel. In addition, we may obtain research information from third parties, including published reports of companies and other issuers, general economic data, and governmental publications and data compilations.</p>	
5	<p>We consider relevant business experience to be one of the most important criteria in selecting persons to provide investment advice to and research for our clients. We do not have specific hiring guidelines but generally require at least a college degree. We seek to hire persons with educational and professional backgrounds that are compatible with the functions that they are hired to perform. Absent suitable business experience, we generally seek to entrust investment advisory and research responsibilities to persons with academic backgrounds, including advanced training, that</p>	

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>HERON FINANCIAL GROUP, LLC</b>		IRS Empl. Ident. No.: <b>64-0963720</b>
Item of Form (identify)	Answer	
6	<p>suggest that they have the skills and intelligence necessary to perform their assigned functions.</p> <p><b>David Edwards</b> Born 1961 Darden Graduate School of Business, University of Virginia, MBA Hamilton College, BA</p> <p>Mr. Edwards founded the firm and serves as its president and chief compliance officer. From 1993 to the present, Mr. Edwards was also president and portfolio manager of Heron Capital Management, Inc., an investment advisory firm registered with the Securities and Exchange Commission. Prior to founding Heron Capital Management, Mr. Edwards was associated with JP Morgan Securities, Inc., Nomura Securities, Inc., and Morgan Stanley &amp; Co., Inc. He has been involved in the securities industry throughout his business career.</p>	
9	<p>We have a written code of ethics that requires us and our personnel to comply fully with all applicable laws, including applicable federal securities laws, in conducting investment advisory services and related activities. Our chief compliance officer is responsible for overseeing adherence to the code of ethics. The code of ethics is based on the principle that we have a fiduciary obligation to our clients. In this fiduciary capacity, we must place the interest of our clients before our own interest and the interests of persons and entities that may be related to us. We seek to avoid conflicts of interest with our clients and will take appropriate steps consistent with our code of ethics to resolve any conflicts of interest that may arise. We provide a copy of our code of ethics to any client or prospective client upon request.</p> <p>Our code of ethics and other compliance procedures establish policies and procedures in a number of areas, including the treatment of confidential proprietary information, recordkeeping, conflicts of interest, and personal securities transactions.</p>	

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>HERON FINANCIAL GROUP, LLC</b>		IRS Empl. Ident. No.: <b>64-0963720</b>
Item of Form (identify)	Answer	
	<p>We permit our supervised persons to purchase and sell securities for their personal accounts and for the accounts of certain persons and entities related to them, so long as they are in compliance with our code of ethics. These securities may be among those recommended to our clients. Duplicate records of these transactions are kept at our offices.</p> <p>We order client and personal transactions in accordance with the following principles:</p> <p style="padding-left: 40px;">Personal transactions are grouped with client transactions and executed at the same price.</p> <p style="padding-left: 40px;">We generally order the investments of accounts from those with the highest percentage of cash to those with the lowest percentage of cash, regardless of whether the account is a client account or a personal account.</p> <p style="padding-left: 40px;">There are exceptions to the general ordering on the basis of cash levels. For example, when we make sales in order to realize tax losses, we focus on those accounts with the greatest net realized capital gains during a year. In addition, we may make rebalancing trades if we believe that a client account has drifted significantly from its target allocations. Finally, we may initiate trades upon completing an account review with a client in person or by telephone.</p> <p>Time stamps or order ticket data are used to verify the sequence of transactions.</p> <p>Our code of ethics requires that our supervised persons obtain clearance in advance from our chief compliance officer with respect to securities offered in an initial public offering or in a private placement of securities. These private placements may involve the securities of private hedge funds and private equity funds. Our code of ethics also requires our personnel to disclose their reportable personal securities holdings, to provide duplicate copies of confirmations and monthly account statements, and to alert our</p>	

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10	<p>compliance officer to any changes in their securities accounts. In addition, we have a written insider trading policy that is designed to prevent the improper use of material nonpublic information.</p> <p>We generally require a minimum of \$250,000 for new investment advisory accounts. We reserve the right to increase or decrease the minimum account size that we accept.</p> <p>It is our policy to know and understand the identities of our clients and prospective clients and the business reasons for any transactions in which we engage on behalf of the clients. We do not directly or indirectly accept or conduct any business with any person or entity whose name appears on the list of specially designated national and blocked persons maintained by the Office of Foreign Assets Control or any foreign shell bank that lacks a physical presence in any country or is not a regulated entity.</p>	
11A, 11B	<p>Mr. Edwards reviews all securities transactions on a daily basis. Formal reviews are conducted twice each year to assess the needs and investment objectives of the client. Reviews cover performance, purchases and sales, rationales for particular investment decisions, and investment strategy. Client inquiries, changes in the general market outlook, and changes in our opinions on specific issues may prompt interim reviews of some or all of our client accounts.</p> <p>Each client receives a monthly report from the account custodian that summarizes the cash and securities positions marked to market as of the close of the month. In addition, each client receives a monthly report from Heron listing assets at cost and marked to market as of 4:00 pm on the last business day of the month. Each client is provided with a calculation of total return and a calculation of the total return of standard benchmarks.</p>	
12	<p>We generally have full discretion and authority over our client accounts, including the authority to select a broker-dealer to execute a particular transaction and to negotiate the rate of commission payable for these services. Sometimes, a client may limit our discretion authority with respect</p>	

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>HERON FINANCIAL GROUP, LLC</b>		IRS Empl. Ident. No.: <b>64-0963720</b>
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	<p>to investment activities and broker-dealer placement. In these cases, we may be unable to negotiate commissions or to obtain best execution. Unless otherwise directed by a client, we limit the broker-dealers that we use to those that we believe will result in the best execution for our client. In some cases, federal and state laws (such as the Employee Retirement Income Security Act of 1974) may limit or restrict our selection of broker-dealers and investment types. We do not participate in “soft-dollar” arrangements, and we do not direct commission business to any broker-dealer in exchange for products and services.</p> <p>In cases in which we have discretionary brokerage authority, we endeavor to select financially responsible broker-dealers that provide best execution. The factors that we consider in selecting a broker-dealer include, but are not limited to, the effectiveness of the transaction clearing and settlement procedures of the broker-dealer, the liquidity of and the amount of capital commitment by the broker-dealer, the degree to which the broker-dealer has been responsive to us in the past, the quality and promptness of the research and brokerage services provided by the broker-dealer (both in general and with respect to particular transactions and accounts), whether the broker-dealer brought the investment in question to our attention, and the reasonableness of the compensation of the broker-dealer in relation to these factors. The rates charged may not be the lowest commission available but should be generally competitive with prevailing rates.</p> <p>We generally aggregate for block execution multiple orders for the purchase and sale of the same security on behalf of several clients. Securities purchased in an aggregated order receive the average price obtained on the order. When aggregating transactions for block execution, we make a good-faith determination that the participating accounts will benefit from the aggregation, that aggregation is consistent with our duty to seek best execution for our clients, and that aggregation is permitted by the investment management agreement between us and each client whose account participates in the aggregation.</p>	

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13B	<p><b>Trade Error Policy</b></p> <p>On occasion, we may experience errors with respect to trades made on behalf of client accounts. We endeavor to detect trade errors prior to settlement and to correct them in an expeditious manner. We will reimburse client accounts for losses directly due to uncorrected trade errors on our part.</p> <p><b>Additional Compensation</b></p> <p>We have written compensation arrangements with several unaffiliated parties for the referral of prospective clients. Clients do not bear additional costs or expenses as a result of these arrangements. The nature of any referral arrangement is fully disclosed to the client.</p> <p><b>Privacy Notice</b></p> <p>Statutes and regulations obligate us and our personnel to maintain and preserve the confidentiality of client and investor nonpublic personal information. We seek to comply with applicable law by providing clients and investors who are natural persons with necessary initial, annual, and revised “clear and conspicuous” notices describing our privacy policies and practices. These policies and practices include (1) a description of the types of nonpublic personal information that we collect, (2) a description of the manner in which we collect the information, and (3) an explanation of the conditions under which we may disclose nonpublic personal information to third parties.</p> <p><b>Proxy-Voting Policies and Procedures</b></p> <p>We have adopted written proxy-voting policies and procedures. To date, our clients have granted us the exclusive right to vote proxies on their behalf. To the extent that any client retains proxy-voting authority or has specific instructions regarding proxy voting, we document this consideration in the investment advisory agreement. Our proxy-voting procedures are</p>	

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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: <b>HERON FINANCIAL GROUP, LLC</b>		IRS Empl. Ident. No.: <b>64-0963720</b>
Item of Form (identify)	Answer	
	<p>available upon request by any client or prospective client. Also available upon request by any client or investor is a record of how we have voted client proxies.</p> <p>We evaluate all proxy proposals on an individual basis. Subject to our contractual obligations, we may determine that refraining from voting a proxy is in the best interests of a client. For example, we may determine that the cost of voting a proxy exceeds the expected benefit to the client.</p> <p><b>Violations of Law</b></p> <p>Our code of ethics requires us to administer discipline in order to maintain the quality of service that we provide to clients by encouraging legal and appropriate behavior and by deterring illegal and inappropriate behavior. Disciplinary actions may include a written warning, fines, suspension of employment, and termination of employment.</p>	

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