

AIA Stock Advice Code of Ethics

This code is adopted under Rule 204a1 of the Investment Advisors Act of 1940.

AIA Stock Advice has a moral and ethical obligation to its clients to provide them with objective investment advice that is suitable based on known information at the time the advice is given. It is also the goal of AIA Stock Advice to only give advice, and thus, allow its clients complete free will and full discretion over their own investment decisions and actions. As such, AIA Stock Advice policies include but are not limited to:

- 1) Act in a professional and ethical manner at all times;
- 2) Provide advice for the benefit and in the best interest of its clients;
- 3) Provide advice based on its own independent and objective research;
- 4) Provide advice in a timely, clear, and concise manner;
- 5) Provide different investment options when appropriate;
- 6) Taking care to avoid ever misleading clients;
- 7) Provide full disclosure of material facts known about an investment at the time advice is given as well as any time the investment is under consideration by AIA Stock Advice;
- 8) Provide full disclosure of potential conflicts of interest known about an investment at the time advice is given as well as any time the investment is under consideration by AIA Stock Advice;
- 9) Will never borrow money from clients;
- 10) Will not recommend the purchase of a security without reasonable belief that the security is registered or that it or the transaction is exempt from registration;
- 11) Will not recommend any particular broker/dealer or agent through which to conduct their investment transactions;
- 12) Will keep records of all AIA Stock Advice securities transactions;
- 13) Will never accept or enter into any agreement that gives AIA Stock Advice any level of discretionary authority over any client's assets;
- 14) Will never make false or intentionally misleading statements, written or verbal, in the course of giving advice or soliciting clients;

- 15) Will never buy or sell a security from or to any client;
- 16) Will never accept compensation in any form based on the performance of its recommendations.
- 17) Will never give advice or trade a security based on insider information nor give advice or trade a security at the request of a company or any related persons of that company;
- 18) Will never trade, sell, or otherwise make available any personal, non-public information of its clients or itself to any other person or entity unless required law or by the explicit written request and consent of both parties involved;
- 19) Will maintain records of transactions, client contracts, communications, and advertisements as required by the Investment Advisors Act of 1940 and the SEC;
- 20) Will maintain a set of policies and procedures to ensure that its activities comply with the provisions of this Code of Ethics and all applicable legal and regulatory requirements.

It is the main objective of AIA Stock Advice to provide advice pertaining to the buying and selling of securities on U.S. securities exchanges and OTC markets based primarily on technical analysis. As such, advice given by AIA Stock Advice is intended to be impersonal in nature and is not intended to take clients' personal situations into consideration. However, if an individual client should ask for personal advice, AIA Stock Advice will do its best to obtain as much accurate information as possible regarding that individual's situation before giving any advice beyond that of the AIA Stock Advice monthly newsletter. This personal advice would be provided with no extra compensation, but it would also be provided less than four(4) times per calendar year and only upon a client's explicit request.

AIA Stock Advice is a separate entity with Kirk Lentz as the sole proprietor. Thus, record keeping, research, advice, communications, and regulatory compliance of AIA Stock Advice are the duties of Kirk Lentz. It is also his duty to maintain a set of policies and procedures that comply with the provisions of this Code of Ethics and all applicable legal and regulatory requirements. In accepting these duties, Kirk Lentz is obligated to act in an ethical and professionally responsible manner in all professional services and activities related to AIA Stock Advice.

Kirk Lentz
Sole Proprietor
AIA Stock Advice