

# RYAN INVESTMENT MANAGEMENT, INC.

## GENERAL INFORMATION & DISCLOSURE STATEMENT

Ryan Investment Management, Inc. has been registered with the U.S. Securities & Exchange Commission and the State of Colorado as a Registered Investment Advisor since September 2001. One of the primary purposes of the Investment Advisors Act of 1940 (the Act), as stated in Rule 204-3 of the Act, is to provide full disclosure to potential clients of a Registered Investment Advisor. This Disclosure Brochure is provided for that purpose and includes all information provided to the Securities & Exchange Commission in Part II of the Form ADV.

**Location:** Ryan Investment Management, Inc. (RYAN) is located at:

418 E. Cooper Ave., Suite 203  
Aspen, Colorado 81611  
(970) 429-1100 work  
(970) 925-6388 fax  
(970) 948-0485 cell

**Personnel:** RYAN is entirely owned by Christopher S. Ryan.  
Christopher S. Ryan: Chris was born in 1962 in Illinois and lived in the Chicago area through high school. He earned his Bachelor of Science - Finance in 1984 from the University of Colorado. He started his career as a broker for Merrill Lynch in Boulder, Colorado from May 1984 through September 1987. Chris went back to graduate school in September, 1987 and earned his Masters of Science - Accounting from the University of Colorado in May, 1989 and earned his CPA from the State of Colorado in June, 1989. After graduate school, Chris worked for two Big 6 accounting firms, Deloitte & Touche in Denver, (1989 - 1991) and Ernst & Young in Dallas (1992 - 1993) in their Valuation Services Group as an equity analyst. In January 1994, Chris joined NationsBank in Dallas as a portfolio manager and earned his Chartered Financial Analyst (CFA) designation in June 1994. In October 1997, Chris returned to Colorado and launched Ryan Investment Management Co., LLC in Aspen, later renamed Cornerstone Investment Management, LLC. In April 2000, Chris rejoined Merrill Lynch as a Senior Financial Advisor to open the Aspen branch. In September 2001, Chris re-started Ryan Investment Management, Inc. Chris and his wife, Donnie, have been married since 1987 and have three daughters, Katherine, Margaret, and Anne.

**Business:** Ryan Investment Management, Inc. primarily develops asset allocation plans based on a client's objectives and then manages the client portfolios according to their plan. To implement the asset allocation plan, RYAN primarily uses exchange traded funds and mutual funds. We primarily provide investment management of our clients' "core capital". Our clients are primarily individuals, family offices, trusts, and non-profit foundations.

We use many methods in our investment management process including fundamental, technical, charting and cyclical analysis. We rely on many sources of information including annual reports and other documents filed with the SEC, company press releases, research materials prepared by others, newspapers, magazines, internet websites, and third party investment analysis service providers. Our investment strategy is normally long-term oriented, but we may occasionally implement short term trading strategies.

**Trading:** It is the policy of RYAN that no person employed by RYAN may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

RYAN or individuals employed by RYAN may buy or sell securities identical to those recommended to customers for their personal account. Additionally, any related person(s) may have an interest or position in a certain security(ies) which may also be purchased in a client account.

We believe it is a positive sign when management invests its own money the same way it invests for its clients. However, we realize these situations can represent a conflict of interest. Therefore, RYAN has established the following restrictions in order to ensure meeting its fiduciary responsibilities to its clients:

1. A officer or employee of RYAN shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of RYAN shall prefer his or her own interest to that of the advisory client.
2. RYAN maintains a list of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. An appropriate officer of RYAN reviews these holdings on a regular basis.

3. RYAN requires that all employees must act in accordance with all applicable Federal and/or State regulations governing registered investment advisory practices.

4. Any individual not in observance of the above may be subject to termination.

**Other:**

We do not compensate anyone, directly, or indirectly, for client referrals. We do not have a minimum size for client accounts, although we seek to attract clients with a minimum of \$1 million in portfolio assets and the fee schedule favors larger accounts. We generally manage client accounts on a discretionary basis. We limit the discretionary authority by prohibiting ourselves from withdrawing funds and or securities from client accounts, except for the payment of monthly fees.

RYAN endeavors to select those brokers or dealers, which will provide the best services at the lowest commission rates possible. The reasonableness of commissions is based on the broker's ability to provide professional services, competitive commission rates, research and other services, which will help RYAN in providing investment management services to clients.

RYAN will block trades where possible and when advantageous to the clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple clients' accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading allows RYAN to execute equity trades in a timely, equitable manner and to reduce overall commission charges to clients.

Some clients, when undertaking an advisory relationship with RYAN, may have a pre-established relationship with a broker or custodian and they will instruct RYAN to execute all transactions through that broker. In the event that a client directs RYAN to use a particular broker or dealer, it should be understood that under those circumstances RYAN may not have authority or influence in negotiating commissions, obtain volume discounts and best execution may not be achieved. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to other clients.

For clients in need of custodial services, RYAN will recommend the use of Charles Schwab Institutional, based on its reputation, the experience of RYAN principals, and the fees charged by Schwab. Neither RYAN nor its related persons are compensated for this recommendation; however, because RYAN participates in Schwab's "Schwab Institutional" program, RYAN and its clients receive certain benefits from Schwab.

RYAN participates in Charles Schwab & Co.'s Schwab Institutional (SI) service program. While there is no direct linkage between the investment advice given and participation in the SI program, economic benefits are received which would not be received if RYAN did not give investment advice to clients. These benefits include: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk serving SI participants exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; ability to have investment advisory fees deducted directly from client account; access to an electronic communication network for client order entry and account information; receipt of compliance publications; access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors; and an interface between Schwablink and AXYS (RYAN's Portfolio Management Software) which we otherwise would have had to purchase. The benefits received through participation in the SI program do not depend upon the amount of transactions directed to Charles Schwab & Co., Inc.

**Fees:**

RIM applies an investment advisory fee schedule based on the dollar amount of the portfolio consistently to all clients. Fees are billed monthly at the end of each month, and are payable in arrears. The fee schedule is as follows:

First \$2 million	1.00%
Next \$3 million	0.75%
Next \$5 million	0.60%
Minimum per year	\$5,000

A \$3 million account, for example, would pay a blended rate of 0.92%. Under certain limited circumstances, we may negotiate fees. Advisory fees are separate and distinct from the fees and expenses charged by mutual funds and exchange traded funds, as well as from brokerage commissions charged by the brokerage firm. RYAN has negotiated equity commissions of \$19.95 per 1,000 shares and \$0.015 per share thereafter with Charles Schwab Institutional. Equity commissions for qualifying households > \$1 million are \$8.95 flat. Certain mutual funds have no transactions fees, however, certain mutual funds are subject to a \$19.99 minimum and \$98.40 maximum transaction fee.

Example: A \$1,000,000 equity account, with 30 trades during the year, would pay \$10,000 (1%) investment advisory fee to RYAN and approximately \$299 in commission (.03%) to Schwab. Total fee: 1.03%

## ACKNOWLEDGMENTS

This is to acknowledge that I/We have read and understood this General Information and Disclosure Statement of Ryan Investment Management, Inc., Registered Investment Advisor.

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Date

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x \_\_\_\_\_

Date

x \_\_\_\_\_

Christopher S. Ryan, CFA for RYAN

x \_\_\_\_\_

Date