Part 2A of Form ADV: Firm *Brochure*

Item 1 Cover Page

COVER PAGE
March 22, 2011

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This brochure provides information about the qualifications and business practices of the Mighty Oak Strong America Investment Company (MOSAIC). If you have any questions about the contents of this brochure, please contact us at 717-790-9001 or email at don.mosaic@comcast.net. 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.

Additional information about the Mighty Oak Strong America Investment Company also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2, Material Changes

The form of ADV Part II has changed to a narrative format from the completion of a prescribed Form ADV Part II in the past. The conduct of the firm and its business practices are otherwise unchanged.

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Item 4 Advisory Business

Item 4, Advisory Business

The Mighty Oak Strong America Investment Company (MOSAIC) was incorporated and began conducting its business in 2002. Donald L. DeMuth owns 100% of its common stock. MOSAIC provides investment supervisory services. MOSAIC furnishes investment advice through consultations with clients and prospective clients including financial planning. This advice generally pertains to mutual funds and publicly traded stock and fixed income securities.

MOSAIC assists in the selection of individual investments and manages portfolios for clients, which includes:

1. Assessing client risk tolerance.
2. Assisting clients in developing an investment policy statement.
3. Recommend and monitor a portfolio of individual securities, mutual funds, and other investments to help clients achieve their investment goals with a risk tolerance with which they are comfortable.
4. Help clients open and maintain accounts with custodians.
5. Maintain trade information and reconcile monthly account statements with custodians.
6. Coordinate with custodian on individual investor's situations.
7. Prepare customized quarterly statements for investors.
8. Access institutional passively-managed asset class funds not generally available to the public.
9. Transmit trading information from clients to custodian.

EMPLOYEE BENEFIT RETIREMENT PLAN SERVICES

MOSAIC also provides advisory services to employee retirement benefit plans through third-party administration services. MOSAIC will analyze the plan's current investment platform, and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed.

MOSAIC will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.

MOSAIC will recommend changes in the plan's investment vehicles, as may be appropriate from time to time. MOSAIC generally will review the plan's investment vehicles and investment policy as necessary. The fee for plan services will be charged as a percentage of assets within the plans. Typically, this fee will be the same as the above-quoted fees for investment management services.

Client's assets will be invested on a client's risk tolerance and investment policy statement. MOSAIC manages portfolios on a number of different ways including active and passive asset allocations. Active assets allocations may use individual equities in various strategies including short sales, margin transactions, and option writing. These strategies have additional degrees of risk that the client should understand before providing MOSAIC consent to engage in such strategies. MOSAIC's management strategy typically utilizes no load mutual loads with active and passive investment strategies. MOSAIC generally manages advisory accounts on a discretionary basis.

Clients and prospective clients complete a risk assessment questionnaire to assist in developing a Risk Tolerance Profile so that their portfolio will be appropriate for the level of risk with which they are comfortable taking. Each client has a unique portfolio designed to suit his expected return requirements and risk temperament. Clients may impose restrictions on investments in specific securities or types of securities.

At December 31, 2010 MOSAIC managed the following client assets:

Discretionary	$41,347,224
Non-discretionary	2,380,650
Total	$43,727,874

Item 5, Fees and Compensation

Fees are typically based upon 1% of invested assets up to $4 million. Fees for clients with assets of $4 -$10 million are 0.95% of invested assets. Fees for clients with assets of $10 -$25 million are 0.90% of invested assets. Fees for clients with assets of $25,000,000 or more under management are negotiable.

All fees calculated as described above and are not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client.

Client fees will be debited from their accounts at the start of each quarter. Clients will grant authority for MOSAIC to receive quarterly payments directly from their accounts held by an independent custodian. Each client will receive a quarterly invoice showing the amount of the fee, the value of the client's assets on which the fee was based and the specific manner in which the fee was calculated.

Fees are invoiced in advance at the beginning of each quarter based upon the fair market value of the client's account at the end of the previous quarter. New accounts are charged a pro-rata fee for the remainder of the quarter in which an account is opened.

Investor advisory agreements may be terminated by mutual agreement of the client and MOSAIC. A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days' written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

All fees paid to MOSAIC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These funds and expenses are described in each fund's prospectus. These funds will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in mutual funds directly without the services of MOSAIC. In that case the client would not receive the services provided by MOSAIC which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Certain funds recommended by MOSAIC also may not be available to the client directly. Accordingly the client should review both the fees charged by the funds and the fees charged by MOSAIC to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Fees are normally deducted from clients' assets. Clients may request to be billed for their fees instead.

Clients will incur transaction fees charged by the custodian for some mutual fund purchases and sales. No transaction fee will be charged by the custodian for some mutual fund purchases and sales. Commissions are charged by the custodian for transactions involving individual stocks. The custodian generally offers to buy and sell fixed income securities with a bid-and-ask spread.

MOSAIC does not accept commissions for the sale of securities or other investment products. It does not receive asset-based sales charges or service fees from the sale of mutual funds. It receives no commissions. For mutual funds, only no-load or exchange traded mutual funds will be recommended to clients.

The relationship is not exclusive and clients have the option to purchase investments recommended by MOSAIC through other investment organizations not affiliated with MOSAIC.

Item 6, Performance-Based Fees and Side-by-Side Management

MOSAIC receives no performance-based fees.

Item 7, Types of Clients

MOSAIC's clients include individuals, pension, profit sharing, and other retirement plans, trusts, estates, charitable organizations, corporations, or other business entities.

MOSAIC has a minimum client relationship of $100,000, which may be waived at MOSAIC's discretion, if the relationship is projected to grow to at least that amount within a reasonable time.

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

MOSAIC utilizes fundamental analysis to build, monitor, and maintain client portfolios. Sources of information used include research materials prepared by others, corporate rating services, financial periodicals, annual reports, prospectuses, Securities and Exchange Commission filings, company press releases, and inspections of corporate activities.

Investment strategies used to implement MOSAIC's investment advice given to clients primarily includes long-term purchases (securities held at least a year). It may also include short-term purchases (securities sold within a year), trading (securities sold within 30 days), short sales, margin transactions, option writing, including covered options, uncovered options, or spreading strategies.

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

Client portfolios primarily are comprised of no-load mutual funds, which are subject to fluctuations in investment values.

Item 9, Disciplinary Information

There are no legal or disciplinary events presently or historically facing MOSAIC, its Registered Investment Advisors, or the integrity of its management.

Item 10, Other Financial Industry Activities and Affiliations

Donald L. DeMuth and William R. Kaufman, MOSAIC's registered investment advisors, are also partners in Donald L. DeMuth Professional Management Consultants, a professional management consulting and certified public accounting firm. William R. Kaufman is also proprietor of William R. Kaufman, Attorney-at-Law. Donald L. DeMuth Professional Management Consultants and William R. Kaufman, Attorney-at-Law provide consulting, accounting, and legal services for clients of MOSAIC in some instances. No conflicts of interest are noted in these relationships.

MOSAIC receives no compensation directly or indirectly from these affiliates. MOSAIC shares office overhead expenses with Donald L. DeMuth Professional Management Consultants and William R. Kaufman, Attorney-at-Law.

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

MOSAIC is a fee-only registered investment advisor, which has a fiduciary duty to its clients. Donald L. DeMuth is a member of the National Association of Personal Financial Advisors (NAPFA) and a Chartered Financial Analyst (CFA) Level III candidate. As such, he is bound by each of their codes of ethics. NAPFA's code of ethics requires its members to maintain objectivity, confidentiality, competence, fairness and suitability, integrity and honesty, regulatory compliance, full disclosure, and professionalism. The complete code can be read at http://napfa.org/about/CodeofEthics.asp.

The CFA Institute Code of Ethics and Standards of Professional Conduct requires its members to act with professionalism, knowledge of the law, independence and objectivity, to not make misrepresentations, not to engage in misconduct, to maintain the integrity of capital markets by not acting upon material nonpublic information, or engage in market manipulation. To clients it owes the duties of loyalty, prudence, care, fair dealing, suitability, fair, accurate, and complete performance presentation, and to preserve confidentiality. To its employers it requires the duties of loyalty, requires written consent from all parties for additional compensation arrangements, and supervisors must make reasonable efforts to detect and prevent legal, regulatory, or code and standards violations. Investment analysis, recommendations, and actions must have a diligent and reasonable basis. Communication with clients and prospective clients must be clear. Records must be retained. Conflicts of interest must be disclosed, clients and employers have priority over members' or candidates' investment transactions. Referral fees must be disclosed to employers, clients, or prospective clients. Members or Candidates must not engage in conduct, which compromises the reputation or integrity of the CFA Institute and must not exaggerate or misrepresent the meaning or implications of membership or candidacy in the CFA program or institute. A complete copy of the code of ethics and standards of professional conduct may be obtained at http://www.cfapubs.org/doi/pdf/10.2469/ccb.v2010.n14.1. MOSAIC claims compliance with the CFA Institute Code of Ethics and Standards of Professional Conduct. This claim has not been verified by CFA Institute.

A copy of the codes of ethics is available to any client or prospective client upon request.

MOSAIC or related persons do not recommend, buy, or sell for client account securities in which it or the related person has a material financial interest. MOSAIC or related persons invest in some of the same securities, which are recommended to clients. The securities are disclosed to clients and prospective clients.

If MOSAIC or related persons buys or sells securities for clients at about the same time it or the related person buys or sells the same securities for our own accounts, the clients' transactions have priority over MOSAIC's or those of related persons.

Item 12, Brokerage Practices

MOSAIC is not a broker/dealer or custodian of its clients' assets. Fidelity Investments is the custodian of client assets. All transactions occur through the custodian. The reasonableness of their compensation is reviewed at least annually. The custodian provides internet access to some of its and third-party research, offers professional education, and meals at professional meetings to MOSAIC and its related persons. These benefits do not affect costs to clients. No clients are harmed or benefited to the advantage or detriment of others as a result of this.

All client transactions have been through the custodian, Fidelity Investments. MOSAIC and its related persons receive no other benefits or compensation for clients' transactions with Fidelity Investments. Therefore, no conflict of interest exists.

Client purchases and sales of securities are not aggregated.

Item 13, Review of Accounts

Client accounts are reviewed on at least a quarterly basis. Clients may request more frequent reviews. Economic and financial circumstances may trigger client reviews on an irregular basis in addition to the regular quarterly reviews. Clients with assets under management of $1 million or more receive an initial personal financial analysis and recommendations and periodic updates.

In general a financial plan will address any and all of the following areas: personal-family records, budgeting, personal liability, estate information, and financial goals.

Tax and cash flow --income tax and spending analysis and planning for current and future years. MOSAIC may illustrate the impact of different investments on a client's current income tax and future tax liability.

Death and disability --assets needed at death, income needs of surviving dependents, estate planning, and disability income analysis.

Retirement --analysis of current strategies and investment plans to help the client achieve his retirement goals.

Investments --analysis of investment alternatives and their affect on a client's portfolio.

MOSAIC gathers this information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals, and attitudes toward risk. Related documents provided by the client are carefully reviewed, including a questionnaire completed by the client. A written report is prepared. Should a client decide to implement recommendations contained in the plan, MOSAIC recommends that the client work closely with his accountant, attorney, and other critical financial advisors. Implementation of the financial plan's recommendations is at the client's discretion. MOSAIC may assist the client through investment management services.

Typically the financial plan will be presented to a client within 90 days, provided that all the information needed to prepare the financial plan has been provided by the client on a timely basis. Clients who engage MOSAIC to manage in excess of $1 million will receive financial planning services, including periodic updates, at no cost. Donald L. DeMuth and William R. Kaufman conduct the reviews.

Triggering Factors

Clients may request reviews. They are encouraged to have reviews when there are significant changes in their personal circumstances, the general economy, or tax laws.

On a monthly basis each client receives an investment report from the custodian. The investment report includes valuation of the client's holdings and transaction details. On a quarterly basis MOSAIC provides each client with a Portfolio Performance Review, which includes its internal rate of return and time weighted rate of return net of fees for the quarter, year-to-date, trailing 12 months, trailing 3 years, trailing 5 years, and from inception of the portfolio to-date. A Graphical Performance History illustrates the growth of $1,000 from the inception of the portfolio on an annual basis in graphical and numerical format. The Portfolio Position Analysis shows the current value of all positions in the client's portfolio.

Item 14, Client Referrals and Other Compensation

MOSAIC and its related persons do not receive referral fees for client referrals or pay them to others.

Item 15, Custody

The custodian, Fidelity Investments, provides monthly account statements directly to clients. Clients should carefully review those statements. Clients also receive the above described reports from MOSAIC. Clients are urged to compare the account statements received from the custodian with the reports received from MOSAIC.

Item 16, Investment Discretion

Clients sign an Investment Advisory Agreement at the inception of each account. They may accept either discretionary or non-discretionary investment management regarding each account.

Item 17, Voting Client Securities

Clients retain the authority to vote their securities. MOSAIC will advise clients who request advice on voting their proxy ballots. Clients receive their proxies directly from the custodian, Fidelity Investments.

Item 18, Financial Information

MOSAIC does not require or solicit prepayment of fees from clients six months or more in advance.

Item 19, Requirements for State-Registered Advisers

Donald L. DeMuth is MOSAIC's 100% owner, president, secretary, and treasurer. He received his B.A. in Business Administration (Accounting and Management) at Franklin and Marshall College, Lancaster, Pennsylvania in 1972. He received his MBA in Finance (Investments) from the Wharton School of the University of Pennsylvania in Philadelphia, Pennsylvania in 1976. He has been a Registered Investment Advisor with the Mighty Oak Strong America Investment Company and president from its inception in August 2002 to the present. He is also managing partner of Donald L. DeMuth Professional Management Consultants, which provides investment, management consulting, accounting, and tax services to physicians and dentists. This affiliated firm is also a Registered Investment Advisor.

William R. Kaufman, Mr. DeMuth's partner, in the consulting firm, is also a Registered Investment Advisor of MOSAIC and a practicing attorney. As appropriate these services may be recommended to advisory clients of MOSAIC.

Mr. DeMuth spends approximately 50% of his time on the business of the consulting firm. Between 1976 and 1996 he was the proprietor of the firm. Since 1996 he has been its managing partner. He is a certified public accountant licensed to practice in Pennsylvania since 1975.

MOSAIC or its management persons have no relationship or arrangement with any issuer of securities.