

Form ADV Part 2 Disclosure Brochure

Item 1 – Cover Page

This brochure provides information about the qualifications and business practices of The *Relaxing* Retirement Coach, Inc. If you have any questions about the contents of this brochure, please contact Jack Phelps, President and Chief Compliance Officer at (781) 235-7550 and/or info@TheRetirementCoach.com.

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.

The *Relaxing* Retirement Coach, Inc. (RRC) is a registered investment adviser. The words “registered investment adviser” are not meant to imply any skill or training, but is common language used to describe a type of business in the investment management history of the United States.



**The
Relaxing
Retirement
Coach, Inc.**

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Item 2 - Material Changes

In July, 2010, the United State Securities and Exchange Commission published a new rule “Amendments to Form ADV” which amends the disclosure document that we provide to clients (hereinafter referred to as members or you) as required by SEC Rules. This Brochure is a new document prepared according to the SEC’s new requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this item will discuss only specific material changes that are made to the brochure and provide members with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to members on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (781) 235-7550 or by email at: info@TheRetirementCoach.com

Item 3 - Table of Contents

Form ADV Part 2A

Item 4 - Advisory Business	3
Programs Offered	3
Assets Under Management	6
Item 5 - Fees and Compensation	6
Termination	7
Item 6 - Performance Based Fees	8
Item 7 - Types of Members	8
Aggregate Household Investment Minimums	9
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	9
Item 9 - Disciplinary Information	10
Item 10 - Other Financial Industry Activities and Affiliations	11
Item 11 - Code of Ethics	12
Item 12 - Brokerage Practices	13
Item 13 - Review of Accounts	15
Item 14 - Client Referrals	16
Item 15 - Custody	16
Item 16 - Investment Discretion	16
Item 17 - Voting Member Securities	16
Item 18 - Financial Information	17
Privacy Policy	18
Business Continuity Plan	19

Item 4 - Advisory Business

The *Relaxing Retirement Coach, Inc.* (hereinafter referred to as RRC, we, us, or our) was founded in 2003 by Jack M. Phelps, ChFC, President.

Through The *Relaxing Retirement Coaching Program™*, we provide personal, one-on-one retirement coaching and investment advice to individuals and couples as described below.

The *Relaxing Retirement Coaching Program™*

There are two phases to The *Relaxing Retirement Coaching Program™*:

1. The Retirement Blueprint Development Program™
2. The Retirement Coach Investment Endurance Program™

PHASE ONE: The Retirement Blueprint Development Program™

Step One: The Retirement *Strategy Assessment™* meeting

Given your unique set of circumstances and priorities, The Retirement *Strategy Assessment™* helps you objectively determine if you are on the right track by identifying costly mistakes you may be making, and opportunities you may be missing out on.

It provides the foundation and catalyst to help you develop and maintain the financial confidence you need to make the educated decisions necessary for a successful retirement experience.

Step Two: The Retirement *Confidence Preparation System™*

The Retirement *Confidence Preparation System™* provides tools and resources in The Retirement *Confidence Creator Acceleration Guide™*, and a retirement coaching meeting to assist you in securing and preparing all relevant personal information necessary for you to make accurate, rational decisions about your future based on fact.

These tools include The Retirement Bucket™, The Retirement Income Predictor™, The Lifestyle Cost Estimator™, The Retirement Resource Quantifier™, and The Retirement Timeline™.

Step Three: The Retirement Blueprint Development Program™

A seven point process is used to create a custom designed Retirement Blueprint™ utilizing the relevant personal information you have assembled in The Retirement *Confidence Preparation System™*.

A Retirement Blueprint™ is a custom designed plan which consists of:

1. **The Retirement Resource Forecaster™**
An in-depth set of forecasts which illustrates specifically how much you may spend in retirement without running out of money, and the investment rate of return that you *must* earn to have your money keep pace with inflation.
2. **The Investment Volatility Regulator™**
A customized investment model designed to provide the highest likelihood of producing the investment rate of return and liquidity you need in order to reach your goals with less market volatility and taxes.
3. **The Investment Diversity Allocator™**
An independent, objective evaluation of your existing investments to insure that they are in line with your Investment Volatility Regulator™ model.
4. **The Retirement Income Synchronizer™**
A system outlining where you should draw income from each year of retirement in an effort to reduce taxes and increase income.
5. **The Income Tax Diminisher™**
An evaluation of the positioning of your assets, and the way you are receiving income, in an effort to reduce taxes while maintaining liquidity.
6. **The Possessions Protector™**
A system of protecting your lifestyle from all of life's potential catastrophes: (long-term illness, death, lawsuits, etc...)
7. **The Probate and Estate Tax Exterminator™**
A system for you to pass on assets at death to whom you want, when you want, how you want, with less delay and cost from probate fees and estate taxes.

PHASE TWO: The Retirement Coach Investment Endurance Program™

Once a custom designed Retirement Blueprint™ has been created in PHASE ONE: The Retirement Blueprint Development Program™, members enter PHASE TWO: The Investment Endurance Program™ in order to implement their custom designed investment model, track performance, and stick to a disciplined investment strategy.

Participating in PHASE ONE: The Retirement Blueprint Development Program™ does not obligate you to participate in PHASE TWO: The Investment Endurance Program™. However, members must participate in The Retirement Blueprint Development Program™ and create a customized Retirement Blueprint™ prior to participating in The Investment Endurance Program™.

Here are the steps in The Retirement Coach Investment Endurance Program™:

Step One: The *Independent Investment Selector*™

As a completely independent advisory firm, RRC has no ties to any particular investment company, and is able to seek quality investment opportunities for members by performing an exhaustive, in-depth fundamental analysis of thousands of investments.

We combine quantitative analysis of past returns, risk, and consistency with insights gleaned through research meetings with fund managers and their research analysts. We seek funds with *disciplined* strategies designed to produce returns in-line with their investment style and fund objective.

To enhance performance potential, while controlling risk and volatility, investments will be diversified across various styles in an attempt to avoid the increased volatility associated with heavy concentrations in any one investment style.

Step Two: Independent Investment Selection Review and Implementation

We meet with you and present the carefully selected investments from Step One - The Independent Investment Selector™. At the conclusion of the meeting, we will coordinate the implementation of the entire program to completion, including all necessary paperwork, phone calls, and communications.

Step Three: The Investment Endurance Recap Meeting

During this meeting with you, we review investment statements and confirmation notices to ensure that you understand the information presented. You are presented with a single, consolidated statement illustrating all reallocated investments, as well as on-line access to accounts, if desired. We also establishes supplemental income streams from investments, typically by direct deposit if desired. Where applicable, we will also arrange to have federal and state income taxes withheld from income streams.

Step Four: Investment Endurance Review Meetings

Investment Endurance Review Meetings are set up in person or on the telephone to help you develop and maintain financial confidence during all economic climates. At these meetings, in addition to receiving consolidated, “easy-to-read” performance reports for all investments, you will receive recommendations, if necessary, to maintain disciplined diversification and risk control, and to take advantage of new investment opportunities. We also provide a perspective on market and economic activity and how it impacts your investment strategy.

Step Five: The Annual Retirement Blueprint Reassessment™

Things have a way of changing over time: your life circumstances, your priorities, inflation, market performance, tax laws, etc. In order to help you maintain your financial confidence, we evaluate the effects of these changes on your custom-designed Retirement Blueprint™ each year by repeating the 7-point process used to create your original Retirement Blueprint™.

Assets Under Management

As of February 28, 2011, the assets under management for The *Relaxing Retirement Coach*, Inc. are \$193,112,000.

The Retirement Coach Investment Endurance Program™ allows us to provide investment advice on a discretionary basis. However, virtually all investment decisions are reviewed by members in the review meetings described above.

Item 5 - Fees and Compensation

The Retirement Blueprint Development Program™

There is a fixed, flat fee of \$1,500 to participate in The Retirement Blueprint Development Program™, which is broken down into two segments:

1. The Retirement *Confidence Preparation System*™ and meeting: \$300
2. Retirement Blueprint™ Design and all meetings: \$1,200

The fee for the Retirement *Confidence Preparation System*™ and meeting, is payable prior to delivery of The Retirement *Confidence Creator Acceleration Guide*™.

The fee for the Retirement Blueprint™, and all meetings involved, is payable 50% upon signing of the agreement and 50% directly after presentation and delivery of the Retirement Blueprint™. We will review and redesign the Retirement Blueprint™ for the next twelve months at no additional fee.

The Retirement Coach Investment Endurance Program™

The annualized fee (which includes transactional costs) charged for The Retirement Coach Investment Endurance Program™ is a percentage of assets under management as follows:

Between \$1,000,000 and \$2,000,000.....	0.90%
Between \$2,000,001 and \$3,000,000.....	0.80%
Over \$3,000,000.....	0.70%

The Retirement Coach Investment Endurance Program™ fee is calculated based upon the fair market value when the account(s) are established, and prorated to the end of the month. Thereafter, the fee is calculated based upon the fair market value of the account(s) as of the last business day of the previous month. Program fees are not negotiable, and they are automatically deducted from an account you select each month.

The Retirement Coach Investment Endurance Program™ is a wrap fee program sponsored by RRC. We pay all transactional fees incurred for securities transactions, other than the SEC fee on equity transactions.

Similar investment management services may (or may not) be available from other investment advisers for a lower fee. Investment management fees, which include investment management and transaction costs, may be more or less costly than paying for the services separately, depending upon the investment advisory fees charged, the number of transactions for the account, the mutual fund share class you purchase and the underlying 12(b)-1 fee, and the level of brokerage and other fees that would be payable if you obtained the services available under the program individually.

General Information on Compensation

All fees paid to us are separate and apart from any internal fees and expenses of mutual funds, variable annuity subaccounts, or Exchange Traded Funds that are ultimately borne by their shareholders. Mutual Funds utilized are either no-load, institutional shares, or funds purchased at NAV. A complete explanation of these fees and expenses is contained in each mutual fund's prospectus.

Related accounts are linked for purposes of fee calculation. This means that certain accounts, approved by us, may be grouped (or aggregated) for fee calculations and, thus, potentially lower your fee rate.

The fee charged is calculated as described above, and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of your funds.

Termination

We guarantee your satisfaction with every step of the Retirement Blueprint Development Program™. If you are not 100% satisfied, we will issue an unconditional full refund upon receipt of your custom designed Retirement Blueprint™.

In the Investment Endurance Program™, members may terminate the agreement at any time by written notice and receive a refund for any fees paid in advance and not yet earned. Additionally, if members are not satisfied for any reason during the first 12 months, they may receive an unconditional full refund of all fees paid during those first 12 months.

Item 6 - Performance Based Fees

(Not Applicable)

Item 7 - Types of Members

The *Relaxing Retirement Coaching Program™* is **only** for individuals and couples who are experiencing one of two situations in their lives:

1. They've reached the point (known as The Employment *Dependency Threshold™*) where they're looking to determine if they've accumulated enough money to be able to stop working in the very near future (whether or not they choose to stop), and then specifically how to confidently make a seamless transition to retirement. Or,
2. They've already stopped working (or retired), and they're not confident spending money. Their cash flow is not what they want it to be. They're paying more taxes than they believe they should have to pay. They're very concerned about their money lasting the rest of their lives.

Historically, those who can benefit the most do not have large monthly pensions which will support the majority of their spending needs in retirement.

Instead, their income in retirement will have to be generated from what they've accumulated in their 401(k)s, 403(b)s, IRAs, and personal investments, etc. Because of this, they now have the task of figuring out:

- a. Do we have enough? (since there is no guaranteed monthly pension for them), and
- b. How do we make the transition? How do we position everything to produce the inflation protected income stream we need without running out of money in the future?

To participate in The Retirement Blueprint Development Program™, there is no minimum amount of investments necessary. However, given the very nature of the program, those who get the most out of the program have already done a very good job of saving and accumulating over the years.

To participate in The Retirement Coach Investment Endurance Program™, we require new members to have an aggregate household minimum account value of \$1,000,000. Rare exceptions are made for friends and family of existing members, and are determined on a case-by-case basis.

In situations where members were accepted prior to the establishment of a minimum aggregate household minimum account value, the Program Fee charged is 1.00% of aggregate household account values below \$1,000,000 until values exceed \$1,000,000.

We require members to establish brokerage accounts at Charles Schwab Institutional. This allows us to efficiently service all member accounts.

Item 8 - Method of Analysis

We firmly believe that it is critical to carefully design a comprehensive Retirement Blueprint™ prior to making any investment recommendations. To that end, in order to participate in investment management services of The Investment Endurance Program™, all members are required to first participate in The Retirement Blueprint Development Program™.

Two of the critical benefits of creating a custom tailored Retirement Blueprint™, which takes into account all of your priorities and resources, are:

1. Carefully calculating the timeline of *when* funds will be needed for income needs, and *how much* will be needed. And,
2. Carefully calculating the long term investment rate of return you need to earn in order to have your assets keep pace with inflation and remain intact as you withdraw funds for income needs in your retirement years.

Once a Retirement Blueprint™ has been created, the goals of The Investment Endurance Program™ are to:

1. Help you increase the probability of achieving the long term investment rate of return you need to earn (*as established in your Retirement Blueprint™*)
2. Help you experience reduced amounts of investment volatility while still achieving the long term rate of return you need to earn (*given the fact that investing in securities involves the risk of potential loss*),
3. Help you reduce the amount of income taxes you pay during the investment distribution phase of your life, and
4. Help you maintain the investment account liquidity for the retirement income you need in order to maintain the lifestyle you desire.

In an effort to achieve these goals, we perform an exhaustive, in-depth fundamental analysis of thousands of investment opportunities in various categories for members.

We combine quantitative analysis of past returns, risk, and consistency with insights gleaned through research meetings with fund managers and their research analysts.

We seek funds with disciplined strategies designed to produce returns in-line with their investment style and fund objective.

Investment allocations are diversified across various styles in an attempt to avoid the increased volatility associated with heavy concentrations in any one investment style.

Item 9 - Disciplinary Information

Neither RRC nor Jack Phelps have any disciplinary history to report.

Item 10 - Other Financial Industry Activities and Affiliations

RRC is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither RRC, nor any of its management persons, is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Neither RRC nor any of its management persons have a material relationship or arrangement with any related person, including

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. pension consultant
9. real estate broker or dealer
10. sponsor or syndicator of limited partnerships.

RRC’s president, John (Jack) Phelps, may be appointed with several insurance companies and may be able to receive separate compensation for transactions implemented through various insurance companies. Members are not obligated to use any company for insurance product purchases, and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from any fees charged by us. Mr. Phelps spends less than 1% of his time on insurance related issues.

We do not recommend or select other investment advisors for our members.

RRC’s president, John (Jack) Phelps, is also the President of Profitable Retirement Coaching Systems, Inc. (PRCS), which provides marketing and operational consulting to investment advisors. Mr. Phelps spends less than 10% of his time on PRCS business matters.

Item 11 - Code of Ethics

We are dedicated to providing effective and proper retirement coaching and financial management services to our members. Our success depends upon a high level of public and member confidence. That confidence can be maintained only if our employees observe the highest standards of ethical behavior in the performance of their duties.

We have the obligation to exercise our authority for the benefit of our members, to place the interest of our members first, and to refrain from having outside interests that conflict with the interests of our members. We must avoid any circumstances that might adversely affect, or appear to affect, our duty of complete loyalty to our members. We do not recommend to members, or buy or sell for member accounts, securities in which we have a material financial interest.

While it is not possible to specifically define and prescribe rules regarding all possible cases in which conflicts might rise, our Code of Ethics sets our policy regarding conduct in those situations in which conflicts are most likely to develop.

Our Code of Ethics contains the following key provisions:

- ∞ Statement of General Principles
- ∞ Policy on and reporting of Personal Securities Transactions
- ∞ A prohibition on Insider Trading
- ∞ Restrictions on the acceptance of significant gifts
- ∞ Procedures to detect and deter misconduct and violations
- ∞ Requirement to maintain confidentiality of member information

Our employees must follow these fundamental fiduciary principles:

1. Place interests of members first. Our personnel must scrupulously avoid serving their own interests ahead of those of members when making any decision relating to personal investments;
2. Not take inappropriate advantage of their positions;
3. Keep information concerning members investments confidential; and
4. Always provide professional investment management advice based upon unbiased independent judgment.

These principles govern all conduct by employees whether or not such conduct is covered by specific procedures. Our employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

John (Jack) Phelps, President and Chief Compliance Officer, reviews all employee trades each quarter.

Members and prospective members can obtain a copy of our Code of Ethics by contacting John (Jack) Phelps at (781) 235-7550.

Item 12 - Brokerage Practices

We recommend that members in The Retirement Coach Investment Endurance Program™ (investment management) open an account with Charles Schwab Institutional, a FINRA registered broker-dealer and member of NYSE and SIPC, to maintain custody of your assets and to effect trades for your accounts. We work with Schwab to streamline operations.

In addition to providing the broker-dealer and custody functions necessary for account management, Schwab provides numerous support services to independent investment advisers and their clients. Under an agreement with Schwab, we pay all transactional fees incurred for securities transactions, other than the SEC fee on equity transactions. We do not receive client referrals from Schwab.

We are independently owned and operated and not affiliated with Schwab. Schwab provides us with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab. And, are not otherwise contingent upon us committing to Schwab any specific amount of business (assets in custody or trading).

Schwab's services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our members' accounts maintained in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to us other products and services that benefit us but may not benefit its members' accounts. Some of these other products and services assist us in managing and administering members' accounts. These include software and other technology that provide access to member account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple member accounts); provide research, pricing information and other market data; facilitate payment of our fees from our members' accounts; and assist with back-office functions, recordkeeping and member reporting.

Many of these services generally may be used to service all or a substantial number of our accounts, including accounts not maintained at Schwab. Schwab also makes available to us other services intended to help us manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing.

In addition, Schwab may make available, arrange and/or pay for these types of services rendered to us by independent third parties. Schwab may discount or waive fees it would otherwise charge for

some of these services or pay all or a part of the fees of a third-party providing these services to us.

While as a fiduciary, we desire to act in our members' best interests, and our recommendation that members maintain their assets in accounts at Schwab may be based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Schwab has provided a loan to us to assist its business operations, and the loan is guaranteed by John (Jack) Phelps, principal of RRC. The terms of the loan require that management fees to us be paid to an account at Schwab for deduction of interest and principal payments pursuant to the loan before we may have access to that fee payment. The loan agreement contains various representations by us, including that we will maintain a minimum of \$75 million in assets under management, and various events of default, including that we will comply with all laws, contracts, licenses and permits. In the event of an unheeded default under the terms of the loan agreement, Schwab may terminate and/or accelerate the loan, which may or may not have a material adverse effect on our ability to perform services.

Some of the products, services and other benefits provided by Schwab, including the Schwab Institutional Business Loan noted above, benefit us and may not benefit our members. Our recommendation that a members place assets in Schwab's custody may be based in part on benefits Schwab provides to us, and not solely on the nature, cost or quality of custody and execution services provided by Schwab.

We place trades for our members' accounts subject to our duty to seek best execution and our other fiduciary duties. We may use broker-dealers other than Schwab to execute trades for member accounts maintained at Schwab. However, this practice may result in additional costs to members so we are more likely to place trades through Schwab rather than other broker-dealers. Schwab's execution quality may be different than other broker-dealers.

Generally speaking, all of our members benefit from research services which may be provided to us by the broker/dealers who effect transactions for our members' accounts. Not all such research services, however, may be used by us in connection with the members' accounts that paid commissions to the broker/dealers providing such research services.

In addition, instances may arise where (a) research services obtained in connection with transactions affected for a particular member's account benefit other members of RRC, or (b) not all research services may be used by us after payment of commissions by clients. Our receipt of research services from broker/dealers who effect transactions for our members' accounts does not reduce our customary research activities.

Item 13 - Review of Accounts and Reporting

Two types of reviews occur on a regular and ongoing basis:

I. Investment Endurance Review Meetings

Independent of member meetings, account reviews are performed on a regular basis by John (Jack) Phelps.

Additionally, several times a year, during pre-scheduled, one-on-one Retirement Coaching Meetings (*either at the office or on the telephone*), your goals and priorities are revisited, performance (in relation to those goals) is objectively evaluated, and adjustments are made, if necessary.

At these meetings, in addition to receiving consolidated allocation and performance reports for all investments, you receive recommendations, if necessary, to maintain disciplined diversification and risk control, and to take advantage of new investment opportunities.

2. Annual Retirement Blueprint Reassessment Program™

Once each year, the effect of various changes (life circumstances, priorities, inflation, market performance, tax laws, etc.) on your Retirement Blueprint are evaluated. You are provided with The Retirement Blueprint Reassessment Guide™ to assist you in updating your information and any personal changes you wish to evaluate.

After receiving the requested information from you, and preparing a completely updated Retirement Blueprint™, a one-on-one meeting is conducted with you to review the effect of any changes on your Retirement Blueprint™, as well as any previously uncompleted Action Steps.

Adjustments are recommended if necessary.

Reporting

Each month, the custodian (Charles Schwab, etc.) provides you with an account statement for each of your accounts which may include individual holdings, cost basis information, deposits and withdrawals, accrued income, dividends, and performance. In addition, the account custodian provides you with trade confirmations for each position bought and sold.

Item 14 - Client Referrals and Other Compensation

We do not make or accept referral fees or any form of remuneration from other professionals when a prospect or member is referred to them.

Item 15 - Custody

Members' assets shall be held in the custody of a bank, trust company or brokerage firm agreed upon by the member and RRC (i.e. Charles Schwab Institutional). You authorize us (in The Investment Endurance Program™ agreement) to debit fees directly from your account(s) at the custodian. The custodian is advised in writing of the limitation of our access to your account(s). The custodian sends a statement to you, at least quarterly, indicating all amounts disbursed from your account(s) including the amount of advisory fees paid directly to us. You should carefully review those statements promptly when you receive them.

While we will assist you in establishing and maintaining accounts at the custodian, we shall have no responsibility or liability with respect to custodial arrangements or the acts, omissions or other conduct of the custodian.

Item 16 - Investment Discretion

The Retirement Coach Investment Endurance Program™ allows us to provide investment advice on a discretionary basis. However, virtually all investment decisions are reviewed by you in the review meetings described above prior to implementation.

Since we are not compensated for trading securities in your account(s), there is no incentive to trade other than to do what is best for you.

Item 17 - Voting Member Securities

We do not vote proxies for members, and do not provide advice to members about how to vote proxies. Members retain the authority to vote proxies, and will be required to ensure that proxy materials are sent directly to them.

We do not render advice to or take any actions on behalf of members with respect to any legal proceedings, including bankruptcies and shareholder litigation.

Item 18 - Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to members, and have not been the subject of a bankruptcy proceeding.

We do not require prepayment of fees of more than \$1,200 per member, and six months or more in advance.

Privacy Policy

We consider customer privacy to be fundamental to our relationship with our members. As such, we are committed to maintaining the confidentiality, integrity and security of personal information about our current and prospective members. It is therefore our policy to respect the privacy of current and former members, and to protect personal information entrusted to us. All employees of RRC, prior to consummating employment with RRC, sign an agreement obligating them by law to adhere to our Privacy Policy.

Members do not have to contact us to benefit from our privacy protections; they apply automatically to all current and former members.

Information Collected and Maintained

We collect and share with others the following types of personal information about members:

- ∞ Information we receive from you to open an account or provide investment advice to you (such as your home address, telephone number, Social Security or taxpayer identification number e-mail address, age, marital status, assets, and income and financial information);
- ∞ Information that we generate to service your account (such as trade tickets and account statements); or
- ∞ Information that we may receive from third parties with respect to your account (such as trade confirmations).

Information Disclosed

We will not disclose any Non-Public Personal Information about you or your account(s) to anyone unless one of the following conditions is met:

- ∞ We receive your prior written consent;
- ∞ We believe the recipient is your authorized representative;
- ∞ We disclose your Non-Public Personal Information as necessary to effect or process a transaction in any account, or to maintain or service your account(s);
- ∞ We are required by law to disclose information to the recipient.

In all such situations, we stress the confidential nature of information being shared.

We may share your personal information with:

- ∞ Non-affiliated companies who provide processing, account maintenance and related services in connection with your investments and other transactions handled by us; and
- ∞ Non-affiliated companies and government agencies only to the extent permitted or required by law, for legal, regulatory or other purposes (for example, for tax purposes or for reporting suspicious transactions).

How Member's Personal Information is Protected

We maintain the confidentiality, security and integrity of member's non-public personal information by:

- ∞ Restricting access to members' Non-Public Personal Information to those employees with a legitimate need for the information; and
- ∞ Maintaining physical electronic and procedural safeguards that meet or exceed federal and industry standards governing how Non-public Personal Information should be stored.
- ∞ We have not and will not sell members' personal information to anyone, even if our formal member relationship ends.

Online Privacy

Privacy, security and service in our online operations are just as critical as in the rest of our business. We therefore employ all of the safeguards described above.

Privacy Policy Update

From time to time, we may amend our privacy policy. You will receive appropriate notice when our privacy policy changes.

How to Contact us with Privacy Questions

For additional questions concerning our Privacy Policy, please contact us by phone at 781-235-7550 or at Info@TheRetirementCoach.com.

Business Continuity Plan

We have a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people. The Business Continuity Plan covers natural and man-made disasters. Electronic files are backed up daily and archived offsite.

Alternate office locations are identified to support our ongoing operations in the event the primary office is unavailable. Our intention is to contact all members within three days of a disaster that dictates moving our office to an alternate location.



**The
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