

## **Ramiah Investment Group**

March 31, 2011

675 N. Barker Road, Suite #200, Brookfield, Wi. USA 53045

Tel. No. (262) 784 7205

Fax. No (262) 7847206

[www.ramiahgroup.com](http://www.ramiahgroup.com)

## **Disclosure Brochure**

(Form 2A of Form ADV)

*This brochure provides information about the qualifications and business practices of Ramiah Investment Group. If you have any questions about the contents of this brochure, please contact us at 262 7847205. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any states securities authority. Additional information about Ramiah Investment Group is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*



## **Material Changes**

The U.S Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative plain English format. This brochure is written in line with that rule and contains specified mandatory sections and organization.

# **Ramiah Investment Group**

## **TABLE OF CONTENTS**

---

- 1. Our Services**
    - A. Managed portfolios**
    - B. 401(k) Advisory Service**
    - C. Self Directed On-Line Accounts**
    - D. Financial Planning**
    - E. Other**
  - 2. Fees**
    - A. Managed Portfolios**
    - B. 401(k) Advisory Service**
    - C. Other**
  - 3. Education and Business Background**
  - 4. Review of Accounts**
  - 5. Conflicts of interests**
    - A. Code of Ethics**
    - B. Personal Trading**
    - C. Other Business Activities**
  - 6. Broker Dealer**
  - 7. Performance-Based Fees**
  - 8. Types of Clients and Account Size**
  - 9. Investment Strategies**
  - 10. Custody**
  - 11. Solicitors**
  - 12. Disciplinary Information**
  - 13. Voting Client Securities**
-

## **1. Our Services**

**A. Managed Portfolios:** At Ramiah Investment Group (hereinafter “RIG”), we focus on a core group of internally managed portfolios for our Clients, depending on the Client’s risk tolerance and investment objectives. RIG manages Client Accounts on a discretionary and non-discretionary basis and provides continuous management in accordance with a signed Investment Management Agreement (hereinafter “IMA”), and a Client profile where risk tolerance and investment objectives are determined. Investment recommendations within the managed portfolios are made without considering potential tax consequences to the Client.

For discretionary accounts, the initial allocations and ongoing trading (buy, sell, exchange and, or otherwise change in allocations) will be made in line with the strategy of each recommended portfolio without prior Client approval of each transaction. The agreement guides all asset allocation and investment selection decisions. RIG is NOT authorized to withdraw cash or securities from the Client’s accounts other than in connection with the payment of RIG’s advisory fees. In non-discretionary accounts, prior Client authorization is obtained before a recommended trade is entered.

**B. 401(k) Advisory Services:** RIG provides investment advice to clients who seek advice in choosing and allocating investments within their 401(k), 403(b), annuity or insurance policy account (“Account”). Recommendations are made in light of current market conditions and the investment options available in the Client’s Account. RIG does not exercise any discretion over the Client’s accounts, nor do we have custody over the Client’s assets. RIG sends periodic updates via e-mails suggesting changes to the Client’s position held in the Account. The recommendations are made from the fund choices available in the Client’s plan. If the Client chooses to follow the recommendations received, the Client is responsible for the execution of the recommendations.

**C. Self Directed On-Line Accounts:** RIG offers self directed-online services to national and international clientele. Services are non-discretionary and are provided directly to individual clients through online account and trading access that does not involve continuous management of the investment advisory accounts. Self directed-online portfolios are for investors who are comfortable with the online service and expect to make and implement their portfolio decisions themselves.

**D. Financial Planning:** When requested, RIG provides financial planning services that take into consideration the client’s tax situation, insurance, retirement, education and estate planning

needs. Financial planning services may include consultations and, or written plans which analyze a client's financial situation and recommend appropriate strategies and methods of implementation.

**E. Other:** Ramiah Investment Group does not issue periodicals about securities on a subscription basis nor provide a timing service, nor furnish advice on matters not involving securities. RIG does not offer tax or estate planning advice.

As of December 31, 2010 RIG has \$58,398,124 of assets under management.

## **2. Fees**

**A. Managed Portfolios:** Fees are calculated on the total market value of the assets under management as determined by the fee schedule below.

Account Value	Annual Advisory Fee*
First \$500,000	3.0%
Next \$500,000	2.5%
Next \$1,500,000	2.0%
Over \$2,500,000	1.5%

Fees are billed in advance and paid quarterly at the start of the quarter and calculated on the ending asset balance of the previous quarter. In any partial billing period, the management fee will be pro-rated based on the number of days that the account was open. Total assets subject to fees include both liquid marketable securities and cash and cash equivalents. A minimum annual fee of \$1000 will apply to all accounts. The negotiable annual fee depends on the size and complexity of the client's account. If the management agreement is terminated by the client, any prepaid fees will be refunded on a pro-rated basis. A third party Custodian calculates the value of the securities in the Account and deducts the fees from the account. The value of the securities is its closing price on the valuation date on the principal market where the securities are traded. *\*RIG charges no further commissions or any transaction, or custody fees. Investment accounts may include Exchange Traded Funds (ETFs) or mutual funds. These funds may incur internal fees and expenses that are not paid to RIG and are separate and apart from RIG's Advisory Fees.*

**B. 401(k) Advisory Services:** The fee for this service is an annual, non-refundable fee of \$350 paid in advance.

**C. Other:** All fees paid to RIG for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses

charged by mutual funds are described in each fund's prospectus and, or statement of additional information. Mutual fund fees generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. Ramu Ramiah, Dan Perik and Jason Visner in their separate capacities as registered representatives, associated with First Allied Securities, Inc. may also receive 12b-1 fees in this manner.

If Ramu Ramiah, Dan Perik, and Jason Visner receive any portion of these commissions, including trailing 12b-1 fees from securities transactions directed to them for an ERISA account of an investment advisory client of RIG, such commissions and 12b-1 fees will reduce dollar for dollar any advisory fees otherwise payable by such advisory client to RIG.

Ramiah Investment Group may also charge fees for financial planning and investment advice.

### **3. Education and Business Background**

**A.** Ramu Ramiah is the portfolio manager for Ramiah Investment Group. Ramu is a graduate of Yale (MBA 1989) and the University of Malaya (B.S. Mech. Eng. 1980). He worked in the oil industry with Schlumberger International in Australia and Indonesia before going to business school in 1986. He is an Investment Advisor Representative registered in Wisconsin and Texas. Before founding Ramiah Investment Group in 2004, Ramu Ramiah was affiliated with Prudential Securities/Wachovia Securities from 1992 to 2004. Ramu Ramiah has concurrently, been a Registered Representative with Round Hill Securities from 2004-2005, and with First Allied Securities (which acquired Round Hill Securities) from 2005 to present.

**B.** Jason Visner is an Investment Advisor Representative registered in Wisconsin and provides advice on investment advisory matters. Jason is a graduate of the University of Notre Dame (MBA 2002; B. S. Mech. Eng. 2001). Before joining Ramiah Investment Group, Jason was the Production Manager at Lakeside Development, an architectural firm (2004-2010). He has had experience working as a Mechanical Engineer for Harley-Davidson (2002-2003) and as Manager for Design Build by Visner (2003-2004). He has concurrently been a Registered Representative with First Allied Securities since 2010.

**C.** Dan Perik is an Investment Advisor Representative registered in Wisconsin and provides advice on investment advisory matters. Dan joined RIG in 2006 and has a B.A in Intercultural Ministries from New Tribes Institute, Sanford, Florida. He was Director of Technology for New Tribes Mission in Papua New Guinea and Wisconsin for six years before joining Ramiah Investment Group. Dan has concurrently been a Registered Representative with First Allied Securities from 2006 to present.

**4. Review of Accounts:** Investment Advisory Accounts are reviewed on an ongoing basis by Ramu Ramiah, Dan Perik and Jason Visner. The calendar is the triggering factor and there are no different levels of review. All Clients with Investment Advisory Accounts directly managed by RIG, will receive a quarterly breakdown of positions, unrealized and realized gains and a performance summary. In addition to these reports, each Client receives statements and confirmations from their broker dealers, custodians and mutual funds and other money managers as appropriate. RIG does not provide performance summaries, statements or confirmation for 401K /403-b/Annuity Advisory services and other external plan management services.

**5. Conflicts of Interest:** Ramiah Investment Group and its investment advisors representatives (IARs) may be engaged in professions other than providing financial planning and investment advice. The IAR's (Ramu Ramiah, Jason Visner and Dan Perik) in their separate capacities as registered representatives associated with a broker dealer, First Allied Securities (hereinafter FASI) sell securities and insurance products for sales commissions. Ramu Ramiah and Jason Visner are licensed with certain states to sell insurance products through appointment with certain insurance companies.

When, in their separate role as Registered Representatives they place securities transactions through FASI, normal and customary sales commissions are paid to RIG. These professions take up a small portion of their time. Ramu Ramiah also owns preferred stock, as a minority shareholder of Advanced Equities Financial Corp. the parent company of First Allied Securities.

Clients should be aware that a conflict of interest exists between the interests of RIG and the interests of the Client; and the Client is under no obligation to act upon RIG's recommendations; and if the Client elects to act upon any of the recommendations, the Client is under no obligation to effect the transaction through the broker-dealer that is recommended by RIG.

**A. Code of Ethics:** Ramiah Investment Group has adopted a Code of Ethics that attempts to deter wrong doing and promote honest and ethical conduct and minimize potential conflicts of interest and foster a culture of high ethical standards of conduct. A copy of RIG's Code of Ethics is available upon request.

**B. Personal Trading:** On occasion Ramu Ramiah, Dan Perik and Jason Visner may each buy or sell securities for their own accounts that they recommend to clients. There should be no conflict of interest as the securities are widely held and publicly traded, and the accounts are too small to affect the market. Such stock orders may be executed as price-averaged block trades, with allocations done pro-rata among the various accounts, including the personal accounts of Ramu Ramiah, Jason Visner and Dan Perik.



**C. Other Business Activities:** Ramu Ramiah, Jason Visner and Dan Perik may sell securities and insurance products for sales commissions. Jason Visner spends about 1 hour a week working on building related work.

**6. Broker Dealer:** Ramiah Investment Group has only fee-based clients. If the fee-based clients want Ramiah Investment Group to recommend a broker, they will get a recommendation based on the broker's costs, skills, reputation, dependability and compatibility with the client, and not upon the financial arrangement between RIG and the recommended broker. However, if the Client wants RIG to implement the advice, First Allied Securities, Inc. will be recommended to them. **NOTE:** Clients may be able to obtain lower fees and commissions from other brokers and the value of the products, research and services given to RIG is not a factor in determining the selection of broker dealers or the reasonableness of their commissions.

**7. Performance-Based Fees:** Ramiah Investment Group does not charge performance-based fees.

**8. Types of Clients and Account Size:** Ramiah Investment Group provides Investment Services to national and international clientele who are individuals. We also provide investment advice to trusts, charitable organizations, pension and profit sharing plans and corporations. The standard minimum account size is \$50,000. (This is negotiated with the client on a case by case basis.)

**9. Investment Strategies:** Investment decisions in the RIG portfolios are made using technical analysis and the core indicator of relative strength. The overall trends of the assets are considered by themselves, as well as in comparison to their class and the overall market. In order to adapt to market volatility RIG offers a group of portfolios at various risk levels that attempt to be invested in good markets but go to cash or equivalents in severe downturns. The portfolios may have exposure to domestic and international equities, domestic and international bonds, commodities and currencies.

The investment strategy presented is an active strategy and may not be suitable for all investors. Investments in this program are subject to market, credit, currency and interest rate risks. The use of computer models do not provide, imply or constitute a guarantee of performance. Any market exposure always entails the possibility of substantial loss of equity and it is possible to lose money by investing in the portfolios. RIG makes no representation of the likelihood or probability that any proposed investing plan will in fact achieve a particular investment goal.

**10. Custody:** RIG does not have custody of Client funds. The funds (including stocks, cash and other holdings) are held at a third party qualified custodian, Pershing LLC. The custodian deducts the advisory fee directly from Client accounts. Account statements are prepared and

sent directly to the Client by the Custodian. Clients should read their account statements carefully and compare it to the portfolio reports prepared by the Ramiah Investment Group or the Broker Dealer. If there are any discrepancies please contact us at 262 7847205.

**11. Solicitors:** Ramiah Investment Group has written solicitor agreements with individuals who are compensated for referring clients to RIG. Client fees are not affected by the compensation made to the solicitor.

**12. Disciplinary Information:** None to disclose.

**13. Voting Client Securities:** Ramiah Investment Group does not vote client securities.

.