

Tobias Financial Advisors, Inc.

1000 South Pine Island Road, Suite 250

Plantation, FL 33324

954-424-1660

www.tobiasfinancial.com

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Firm Brochure and Supplement

(Part 2A of Form ADV)

This Brochure provides information about the qualifications and business practices of Tobias Financial Advisors, Inc. d/b/a Tobias Financial Advisors ("TFA"). If you have any questions about the contents of this Brochure, please contact us at 954-424-1660 and/or info@tobiasfinancial.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.

Additional information about Tobias Financial Advisors, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Tobias Financial Advisors, Inc. is 104711.

Tobias Financial Advisors, Inc. is a registered investment advisor. Registration of an Investment Advisor does not imply any level of skill or training.

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Advisory Business

Tobias Financial Advisors - Firm Description

Tobias Financial Advisors, Inc. ("Tobias Financial Advisors" or "TFA") is an investment advisor providing financial planning, consulting, and investment management and advisory services to individuals, pension and profit sharing plans, trusts, estates, corporations and other business entities including foreign entities. TFA is a fee-only investment management and financial planning firm and the only compensation we receive is that paid to us directly by the client. The method that fees are charged may include a percentage of assets under management, hourly charges, and/or fixed fees.

Tobias Financial Advisors has been in business since 1980, but has been a Registered Investment Advisor since January 13, 1989. Prior to that time the corporation was engaged in the business of Public Accounting. TFA is 100% owned by Benjamin A. Tobias, who is also its chief compliance officer.

An initial consultation, which may be in person or by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client and whether we believe there is a basis for a mutually beneficial relationship. Subsequent to the initial consultation but prior to engaging TFA to provide any of the foregoing investment advisory services, the client will be required to enter into one or more written agreements with TFA setting forth the terms and conditions under which TFA shall render its services.

TFA does not accept commissions or finder's fees in any form.

Types of Advisory Services

Tobias Financial Advisors offers advice to individuals, pension and profit sharing plans, trusts, estates, corporations, and other business entities, including foreign entities.

TFA typically allocates its clients' investment management assets on a discretionary and occasionally non-discretionary basis among mutual funds, exchange traded funds, individual debt and equity securities and/or options as well as the securities components of variable annuities and variable life insurance contracts in accordance with the investment objectives of the client.

If a client participates in TFA's discretionary portfolio management services, the firm requires the client to grant discretionary authority to manage the account. Discretionary authority will allow TFA to determine the specific securities, and the amount of securities, to be purchased or sold for clients' accounts without their approval prior to each transaction. Discretionary

authority is typically granted by the investment advisory agreement that clients sign with TFA, i.e., a power of attorney or trading authorization forms. If a client enters into non-discretionary arrangements with TFA, the firm must obtain approval prior to executing any transactions on behalf of the client's account.

TFA shall generally recommend that clients utilize the brokerage and clearing services of TD Ameritrade Holding Corporation ("TD Ameritrade") for investment management accounts. However, client accounts may be held at another broker-dealer, mutual fund or insurance company as directed by the client.

TFA's clients are advised to promptly notify TFA if there are ever any changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon TFA's management services.

TOBIAS WEALTH MANAGEMENT SERVICE

TFA offers to its clients a service called the Tobias Wealth Management Service. This service consists of the offering of an annual meeting and quarterly performance reviews, which include statements showing assets by asset class, portfolio performance returns and a statement of changes in portfolio values.

Clients may request various financial planning functions over time, including but not limited to income and estate tax planning, risk assessments, education and retirement planning.

Clients participating in the Tobias Wealth Management Service will grant TFA limited power of attorney. This allows TFA to execute purchase and sales transactions in the client's portfolio. TFA designs its portfolios as long-term investments and frequent or unscheduled asset withdrawals may hinder or impede the achievement of a client's investment objectives.

TFA may offer to prepare individual income tax returns, generally for wealth management clients whose returns are not complex and who are not business owners. In most cases, there is no extra cost for this service. For those clients for whom TFA does not prepare the tax return, worksheets, either hard copy or electronically, are prepared for the clients' tax preparer to aid in preparation.

Client assets are maintained at an independent custodian, generally TD Ameritrade.

Due to the long-term nature of TFA's investment philosophy, clients should not expect frequent changes in their portfolio. As a result of monitoring the account, portfolio modifications will be made periodically.

TOBIAS ASSET ALLOCATION SERVICE

TFA offers to its clients a service called the Tobias Asset Allocation Service. This service consists of the offering of an annual meeting and performance reviews, which include statements showing assets by asset class, portfolio performance returns and a statement of changes in portfolio values. Preparation of a comprehensive financial plan is not offered in this engagement.

Clients participating in the Tobias Asset Allocation Service will grant TFA limited power of attorney. This will allow TFA to execute purchase and sales transactions in the client's portfolio. TFA designs its portfolios as long-term investments and frequent or unscheduled asset withdrawals may hinder or impede the achievement of a client's investment objectives.

Client assets are maintained at an independent custodian, generally TD Ameritrade.

Due to the long-term nature of TFA's investment philosophy, clients should not expect frequent changes in their portfolio. As a result of monitoring the account, portfolio modifications will be made periodically.

TOBIAS FINANCIAL PLANNING SERVICE

TFA may provide its clients with a broad range of modular financial planning and consulting services relating to the specific needs of the client (which may include tax-related and other non-investment related matters). Depending on the needs of the client, the plan will either be comprehensive in nature, modular (relating to specific topics of interest to the client), or strictly investment advice.

Tailoring of Advisory Services

TFA provides investment advisory services in accordance with the specific needs and goals of the client. Prior to initiating investment advisory services, an investment advisor representative will discuss with the client their particular investment objectives. Risk tolerance will be reviewed and an investment policy prepared, which will outline the investment plan. Only after the investment policy is agreed to by the client and TFA, will investments be made. Clients at any time may impose restrictions, in writing, on TFA's services.

Wrap Fee Programs

TFA does not provide a wrap fee program.

Assets Under Management

As of December 31, 2011, TFA managed \$164,302,334 on a discretionary basis and in addition managed \$14,626,401 on a non-discretionary basis.

Fees and Compensation

The specific manner in which fees are charged by Tobias Financial Advisors is established in a client's written agreement with TFA. Generally TFA will bill its fees quarterly in advance based on the value of the client's account on the last day of the previous quarter. Clients generally will authorize Tobias Financial Advisors, Inc. to directly debit fees from client accounts.

Management fees shall not be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Therefore, if a client has pre-paid advisory fees that have not yet been earned by TFA, the client will receive a prorated refund of those fees. All fees are subject to negotiation.

Clients will incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by managers, including but not limited to custodial fees, transfer taxes, wire transfer and electronic fund fees. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. These fees are exclusive of and in addition to TFA's fee, and TFA shall not receive any portion of these commissions, fees, and costs.

TOBIAS WEALTH MANAGEMENT SERVICE

The Standard Fee Schedule is as follows:

PORTFOLIO VALUE	ANNUAL FEE
First \$1,000,000	1.00%
Next \$1,500,000	0.85%
Next \$1,500,000	0.65%
Next \$2,000,000	0.50%
Additional Assets	0.35%

There is a minimum quarterly fee of \$1875 which equates to \$7,500 annually; fees are negotiable. Under certain situations, fees and account minimums may be modified based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing

client relationship, account retention, pro bono activities, etc.). In that event, fees will be determined on a case-by-case basis. Clients who are invested in mutual funds, which charge a management fee as an expense, in effect are paying dual fees. Fees are subject to change with 30 days advance notice.

TOBIAS ASSET ALLOCATION SERVICE

The Standard Fee Schedule is as follows:

<i>PORTFOLIO VALUE</i>	<i>ANNUAL FEE</i>
First \$500,000	1.25%
Plus on assets over \$500,000	1.00%

If a financial plan has not been prepared there will be an initial set up fee of \$1,000. There is a minimum quarterly fee of \$750 which equates to \$3,000 annually; fees are negotiable. Under certain situations, fees and account minimums may be modified based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention, pro bono activities, etc.). In that event, fees will be determined on a case-by-case basis. Clients who are invested in mutual funds, which charge a management fee as an expense, in effect are paying dual fees. Fees are subject to change with 30 days advance notice.

TOBIAS FINANCIAL PLANNING SERVICE

Minimum Fee	\$5,000
Assets in excess of \$1,000,000 or income in excess of \$200,000; or one closely held business:	\$6,000
Assets in excess of \$1,500,000 or income in excess of \$300,000:	\$7,000
Assets in excess of \$2,000,000 or income in excess of \$500,000 or two closely held businesses:	\$10,000

For clients with assets in excess of \$2,500,000 or income in excess of \$750,000, financial planning fees will be determined on an individual basis. Under certain situations, fees and account minimums may be modified based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention, pro bono activities, etc.).

Modular financial plans and investment advice will be charged based on either an hourly rate of \$100 to \$500/hour or a fixed rate of \$3,000 to \$50,000. Fees are based on the complexity of the client's financial situation as well as the experience and position of the individual preparing the

financial plan (i.e., client will pay more for Mr. Tobias' expertise than for his administrative staff's help in preparation of the plan).

Performance-Based Fees and Side-By-Side Management

Tobias Financial Advisors does not charge nor accept any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). In addition, TFA is not a side-by-side manager (one that manages both accounts that are charged a performance based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee).

Types of Clients

Tobias Financial Advisors provides portfolio management services to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, corporations, and other business entities, including foreign entities.

While TFA does not have a minimum client size, TFA does have minimum fees associated with the various services. The minimum fee associated with the Tobias Wealth Management Service is \$7,500 per year, while for the Tobias Asset Allocation Service the minimum fee is \$3,000 per year. Tobias Financial Planning service entails a minimum fee of \$5,000 for a comprehensive financial plan.

Client relationships vary in scope and length of service but are generally long term relationships.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include fundamental analysis and technical analysis.

Fundamental analysis is a process that involves analyzing individual companies and their industry groups. Technical analysis requires a study of past price patterns, as well as trends in the financial markets, to anticipate the direction of the overall market and specific stocks.

The primary risk of fundamental analysis is that estimates of intrinsic value might be incorrect. The primary risk of technical analysis is that past price patterns may not be repeated, and

trends might not indicate the direction of the market or specific stocks. Furthermore, past performance is not a guarantee of future investment success.

Sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, newsletters, prospectuses, annual reports, filings with the Securities and Exchange Commission, and company press releases.

In addition, TFA may use Morningstar stock and mutual fund information and a variety of services that provide stock and mutual fund pricing and volume information.

Investment Strategies

TFA's investment management strategy takes a tactical asset allocation approach. Studies have shown that asset allocation (the mix of different asset classes such as stocks, bonds, international, real estate, etc.) is the primary factor that influences investment returns.

Tobias Financial Advisors manages investment portfolios for clients with a focus on maintaining and increasing their net worth above inflation and taxes. The primary investment strategy TFA uses for discretionary investment management accounts is developing and maintaining a globally diversified investment portfolio. The investment strategy for the client is based upon the objectives stated by the client during consultations as well as, in most situations, the results of a risk tolerance questionnaire completed by the client. The client may change their objectives at any time, and if they do, it is their responsibility to communicate any changes to TFA. The asset allocations are further defined by the client's investment time horizon. For example, with all else being equal, clients that are drawing income, for instance, will have a portfolio structured with less volatility than a client that may not need to draw income for many years.

If an asset class appreciates or depreciates significantly compared to another asset class, TFA will "rebalance", by selling or purchasing investments contained in that asset class that has appreciated or depreciated in value in order to bring it back into "tolerance" bands. Occasionally, TFA may also decide to allocate more to asset classes it believes are undervalued or less to asset classes that it believes are overvalued or subject to greater risk.

Tax Management

Client portfolios may consist of multiple accounts with differing tax treatment of gains, interest, dividends, and withdrawals. Tobias Financial Advisors attempts to minimize the long term impact of taxes by taking advantage of the various tax favored investments available to clients. For instance, strategies may include taking tax losses, postponing a gain to achieve more

favorable tax rates, placement of assets into a qualified vs. non-qualified account or perhaps the recommendation of a Roth conversion.

Risk of Loss

All investment programs have certain risks and involve the risk of loss that is borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Credit risk:** The chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make sure payments will cause the price of the bond to decline, thus reducing the investor's total return.
- **Call risk:** The chance that during periods of falling interest rates, issuers of callable bonds may call (repay) securities with higher coupons or interest rates before their maturity dates.
- **Market risk:** Prices of securities such as stocks, bonds, and mutual funds may drop in reaction to a variety of events and conditions. This risk is caused by external factors which may be independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Country risk:** The chance that world events – such as political upheaval, financial troubles, or natural disasters – will adversely affect the value of securities issued by companies in foreign countries.
- **Reinvestment risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business risk:** These risks are associated with a particular industry or a particular company within an industry.

- **Liquidity risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Lack of marketability risk:** The inability to sell an investment. Lack of marketability may be due to investment lock-up periods.
- **Financial risk:** Excessive borrowing to finance a business' operations increases the risk, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and / or a declining market value.
- **Leverage risk:** Since leverage magnifies both gains and losses, an investment that uses leverage can expose the investor to a greater loss than it would have been, if the investment moves against the investor.
- **Manager risk:** The chance that poor security or money manager selection will cause the client's portfolio to underperform.
- **Operational risk:** The risk that deficiencies in information systems or internal controls, human errors or management failures will result in investment losses. It also includes the risk of loss due to breakdowns or weaknesses in internal controls and procedures.

Recommendation of Particular Types of Securities

As disclosed under the "Advisory Business" section in this brochure, TFA primarily recommends the following types of securities: mutual funds, exchange traded funds, individual debt and equity securities and/or options, as well as the securities components of variable annuities.

Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Mutual funds and exchange traded funds are professionally managed and pool money from many investors. They invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and exchange traded funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in smaller or riskier companies, uses leverage (i.e., borrows money) to a significant degree, or focuses on a particular type of security. Exchange traded funds differ from mutual

funds, since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and exchange traded funds can be reduced by the costs to manage the funds.

Corporate debt securities (or “bonds”) are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be “called” prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return. Bond prices tend to fall as interest rates rise.

Options and warrants give an investor the right to buy or sell a stock at some future time at a set price. Options are complex investments and can be very risky, especially if the investor does not own the underlying stock.

Disciplinary Information

TFA and its employees have not been involved in legal or disciplinary events related to past or present investment clients. Tobias Financial Advisors, Inc. and its management persons do not have any legal or disciplinary events to disclose.

Other Financial Industry Activities and Affiliations

TFA may provide certain of its clients with tax planning services including tax preparation. TFA may charge a separate fee for these services, which shall be agreed upon prior to rendering the services. For clients that have engaged TFA under the Tobias Wealth Management Service, all or a portion of the fee for such tax-related services may be included in their fee charged for investment management services.

As further discussed above, TFA may offer its clients a broad range of comprehensive financial planning and/or consulting services (which may include non-investment related matters). TFA may charge a separate fee for these services, which shall be agreed upon prior to rendering the services.

Code of Ethics

Tobias Financial Advisors abides by a Code of Ethics in regards to all of its practices and policies. This code sets forth a standard of business conduct required of all employees that recognizes their fiduciary obligation to each client and mandates honest and ethical conduct at all times. It means that Tobias Financial Advisors has an affirmative duty of utmost good faith to act solely in the best interest of its clients. Any prospective or existing client may request a copy of this Code of Ethics, which is available at no charge by request. To request a copy please call or e-mail with the information contained on the cover page of this document.

The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, and personal securities trading procedures, among other things. All supervised persons at TFA must acknowledge the terms of the Code of Ethics annually, or as amended.

Persons associated with TFA, including all officers and employees, are permitted to buy or sell securities that it also recommends to clients. TFA maintains a profit sharing plan for the benefit of its employees. The profit sharing plan is invested as if it were a client of TFA.

TFA does not recommend to clients, nor buy nor sell for client accounts, securities in which TFA or its officers or employees have a material financial interest. Principal transactions are generally defined as transactions where an advisor, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. TFA does not sell, recommend, or manage securities which are not listed on major public securities exchanges. TFA believes that the risk associated with dealing in non-exchange-traded securities is inappropriate for the clients TFA serves. Utilizing only securities that are listed on public securities exchanges reduces the opportunity for trading abuses.

Brokerage Practices

The transaction fees charged by TD Ameritrade and other custodians are exclusive of and in addition to TFA's fee. Tobias Financial Advisors does not receive fees or commissions from any firms with whom it does business, but may receive other benefits as discussed above under "Other Financial Industry Activities and Affiliations".

TFA participates in the TD Ameritrade Institutional Services program. TD Ameritrade Institutional Services is a division of TD Ameritrade Holding Corporation. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers services to

independently registered investment advisors which include custody of securities, trade execution, and clearance and settlement of transactions. TFA receives some benefits from TD Ameritrade through its participation in the program.

TFA may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between TFA's participation in the program and the investment advice it gives to its clients, although TFA receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors.

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving TFA participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to TFA by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by TFA's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit TFA but may not benefit its client accounts. These products or services may assist TFA in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help TFA manage and further develop its business enterprise. Currently, TFA is working with TD Ameritrade as a beta tester for its Salesforce software system. In exchange for beta testing the system, TD Ameritrade has provided the Salesforce system free of charge to TFA for one year in addition to the cost of converting from TFA's prior system.

The benefits received by TFA or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, TFA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TFA or its related persons in and of itself creates a potential conflict of interest and may indirectly influence TFA's choice of TD Ameritrade for custody and brokerage services.

Benjamin A Tobias serves on the TD Ameritrade Institutional Advisor Panel ("Panel"). The Panel consists of investment advisors that advise TD Ameritrade Institutional on issues relevant to the independent advisor community. The Panel meets in person on average three to four times per year and conducts periodic conference calls on an as needed basis. Mr. Tobias has been serving on this panel since 2005 and has been appointed to an indefinite term. At times, Panel members are provided confidential information about TD Ameritrade initiatives. Panel members are required to sign confidentiality agreements. TD Ameritrade does not compensate Panel members. However, TD Ameritrade pays or reimburses for the travel, lodging and meal

expenses that Mr. Tobias incurs in attending Panel meetings. The benefits received by Mr. Tobias serving on the Panel do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by TFA or its employees in and of itself creates a potential conflict of interest.

Factors which TFA considers in recommending TD Ameritrade or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research, and service. TD Ameritrade enables TFA to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The transaction fees charged by TD Ameritrade may be higher or lower than those charged by other broker-dealers.

Soft Dollar Benefit – TFA does not participate in any soft dollar agreement. A soft dollar agreement between an advisor and a broker such as TD Ameritrade would entitle the advisor to a percentage of each trade commission paid for any purchase or sale of securities in its clients' accounts. The advisor could use these soft dollars to purchase investment research services.

The commissions and transaction fees paid by TFA's clients shall comply with TFA's duty to obtain "best execution". However, a client may pay a commission or transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where TFA determines, in good faith, that the cost is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, transaction rates, and responsiveness. Consistent with the foregoing, while TFA will seek competitive rates, it may not necessarily obtain the lowest possible transaction rates for client transactions.

The client may direct TFA in writing to use a particular broker-dealer to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and TFA will not seek better execution services or prices from other broker-dealers or be able to "batch" client transactions for execution through other broker-dealers with orders for other accounts managed by TFA (as described below). As a result, the client may pay higher commissions and or transaction fees or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, TFA may decline a client's request to direct brokerage if, in TFA's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Transactions for each client generally will be effected independently, unless TFA decides to purchase or sell the same securities for several clients at approximately the same time. TFA may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate

more favorable transaction rates, or to allocate equitably among TFA's clients differences in prices and other transaction costs that might have been obtained had such orders been placed independently.

Review of Accounts

For those clients that TFA provides investment supervisory services, account reviews are conducted on an ongoing basis by TFA. Investment advisory clients are encouraged to discuss their needs, goals, and objectives with TFA and to keep TFA informed of any changes. TFA will contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

TFA may also conduct account reviews upon the occurrence of a triggering event, such as a change in clients' investment objectives and/or financial situation, market corrections, and client request.

TFA maintains a portfolio accounting system that contains all transactions and account details, including tax cost basis, pertaining to client accounts. Reports have been designed to be clear, concise and complete. Clients receive periodic reports from TFA as well as directly from their custodians.

Client Referrals and Other Compensation

As a Fee-Only advisor, the only compensation Tobias Financial Advisors receives is directly from its clients for the services TFA provides to them.

TFA has been fortunate to receive many client referrals over the years. The referrals have come from current clients, accountants, estate planning attorneys, employees, personal friends of employees, and other similar sources. TFA does not compensate referring parties for these referrals.

Additionally, TFA does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Custody

TFA does not take custody of client funds or securities. All assets are held at third-party custodians; clients receive statements at least quarterly from those financial vendors, confirming transactions and security positions. Clients are urged to carefully review these statements, as well as those sent by TFA. TFA sends quarterly statements via the USPS or electronic means, according to the client's wishes, and encourages clients to compare TFA statements to custodian statements.

Though TFA does not take custody of client funds, TFA does have the ability to change client account addresses via TD Ameritrade's website, as well as through websites or by telephone of some additional financial vendors. All custodians notify clients whenever address changes are made, with notifications of said change sent to both the old and the new addresses; thus, clients are alerted to this change of address.

Investment Discretion

Tobias Financial Advisors typically receives discretionary authority, by executing either a Tobias Wealth Management or Tobias Asset Allocation agreement at the outset of an advisory relationship. Prior to the implementation of investment transactions, TFA and the client will agree in writing to an Investment Policy through the execution of an Investment Policy Statement (IPS). The IPS contains general guidelines as to the investments to be placed in the client's portfolio and contains an expected rate of return.

Clients who engage TFA on a discretionary basis may, at any time, impose restrictions, in writing, on TFA's discretionary authority, i.e. limit the types/amounts of particular securities purchased for their account.

When selecting securities, Tobias Financial Advisors adheres to the investment policies, limitations and restrictions of the clients for whom it advises.

Investment guidelines and restrictions must be provided to Tobias Financial Advisors in writing. The distinction between discretionary and non-discretionary management is discussed in detail in Item 4.

Voting Client Securities

As a matter of firm policy and practice, TFA does not take any action, vote, or render any advice with respect to the voting of proxies solicited by the issuers of securities in which assets of the client may be invested. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. However, TFA may, on occasion, and only at

the client's request, offer clients advice regarding corporate actions and the exercise of their proxy voting rights.

Financial Information

TFA has no financial commitment that precludes its ability to meet contractual and fiduciary commitments to clients, and has never been the subject of a bankruptcy proceeding.

A balance sheet is not required to be provided because TFA does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client and six months or more in advance.

Additional Information

Privacy

TFA views protecting clients' private information as a top priority. Pursuant to applicable privacy requirements, TFA has instituted policies and procedures to ensure that our firm keeps your personal information private and secure.

TFA does not disclose any nonpublic personal information about clients to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client's account, TFA may share some information with service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

TFA restricts internal access to nonpublic personal information about clients. TFA maintains physical and procedural safeguards that comply with regulatory standards to guard clients' nonpublic personal information and to ensure our integrity and confidentiality. TFA will not sell information about you or your accounts to anyone. TFA does not share your information unless it is required to process a transaction, at your request, or required by law.

Clients will receive a copy of TFA's privacy notice prior to or at the time they sign an advisory agreement with our firm. Thereafter, TFA will deliver a copy of the current privacy policy notice to clients on an annual basis. Please contact TFA at the telephone number on the cover page of this brochure if there are any questions regarding this policy.

Trade Errors

In the event a trading error occurs in a client's account, TFA's policy is to restore an account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Class Action Lawsuits

TFA does not determine if securities held by clients are the subject of a class action lawsuit or whether they are eligible to participate in class action settlements or litigation. TFA will not initiate or participate in litigation to recover damages on clients' behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities.