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This *FIRM BROCHURE* provides information about the qualifications and business practices of Horowitz & Company, Inc. If you have any questions about the contents of this Firm Brochure, please contact us at (954) 349-0800 or at www.horowitzandcompany.com.

Horowitz & Company, Inc. is Registered Investment Advisor. The information in this Firm Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Firm Brochure provides information about Horowitz to assist you in determining whether to retain Horowitz as your advisor.

Additional information about Horowitz & Company, Inc. is available on the SEC's website at www.adviserinfo.sec.gov (the CRD number for Horowitz & Company, Inc. is 106737).

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ITEM 2: MATERIAL CHANGES

Form ADV 2 is divided into two parts: Part 2A and Part 2B. Part 2A (the “Firm Brochure” a/k/a “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. Part 2B (the “Brochure Supplement”) provides information about advisory personnel of Horowitz.

Horowitz believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

The following changes have been made to this Disclosure Brochure since the last filed and distributed version:

Item 19 and the Brochure Supplement have been amended to reflect that Andrew Horowitz has disclosure information, the details of which could be found on IAPD at www.adviserinfo.sec.gov.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Horowitz.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (954) 349-0800 or at www.horowitzandcompany.com.

Please Retain a Copy of This Brochure for Your Records

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ITEM 4: ADVISORY BUSINESS

INTRODUCTION

Horowitz & Company, Inc. (hereafter “Horowitz”), is a fee-based investment adviser that offers two types of advisory services: *Portfolio Management Services* and *Financial Planning Services*.

Horowitz is an investment advisory firm formed in 1991. The experience, education, and background of its principals and investment adviser representatives (hereafter “IA Reps”) can be found in the accompanying *BROCHURE SUPPLEMENT* document.

Horowitz’s principal owner is: **Andrew A. Horowitz**

INITIAL CONSULTATION

Horowitz will begin with a consultation. Horowitz uses the initial consultation to:

- Introduce the Client to Horowitz’s firm, its services, and staff;
- Gather information about the Client’s investment objectives, financial condition, and risk tolerance, which Horowitz uses forming its investment advice; and
- Reach an agreement on the terms of service and compensation arrangements.

To determine suitable investment recommendations, Horowitz will provide the Client with a Questionnaire, the *Suitability Questionnaire*, to uncover such factors as risk tolerance, financial goals and objectives which, along with other factors, will assist in forming the appropriate selection of assets and allocation. Based on the information gathered, Horowitz will adopt policies and procedures, the *Investment Policy*, for the selection and portfolio creation.

At the conclusion of the initial consultation, the Client will sign Horowitz’s *Ongoing Portfolio Management Agreement*, which serves as the contract between the Client and Horowitz, specifying the precise nature of services to be rendered by Horowitz and fees to be paid by the Client.

PORTFOLIO MANAGEMENT SERVICES

If the Client elects *Portfolio Management Services*, Horowitz will seek to have the portfolio management performed on a *discretionary basis*. The *investment discretionary authority* will be *limited* to allow Horowitz to enter transactions on the Client’s behalf, determining which Fund and/or Security to buy or sell. Clients will be notified of all transactions by trade confirmations from their custodian and through communication with Horowitz. Clients should always review their custodial account statements to verify the trading activity and withdrawals that occur in their account(s).

Horowitz will also request the Client provide *written authorization* to allow the broker-dealer/custodian; specifically *Schwab Institutional* (Schwab) and *Interactive Brokers LLC* (IB) to deduct Horowitz’s advisory fee from the Client’s account directly (discussed at greater length in the “FEES AND COMPENSATION” section on page 6 of this *FIRM BROCHURE*); however, Horowitz will *not* have the authority to make any other withdrawals from the Client’s account(s) under management.

Although Horowitz primarily manages Client accounts on a *discretionary* basis, it will consider *non-discretionary* management. Since Horowitz will recommend all Clients grant it discretionary authority, Horowitz anticipates very little of its *Asset Management Services* to be rendered on a non-discretionary basis.

With regard to current non-discretionary accounts, Horowitz had **\$6,200,000** in **non-discretionary assets under management** at the time this document was prepared (30 March 2012).

With regard to current discretionary accounts, Horowitz had **\$52,500,000** in **discretionary assets under management** at the time this document was prepared (30 March 2012).

Whether discretionary or non-discretionary, Horowitz will evaluate the Client's financial condition and risk tolerance in order to tailor its securities recommendations to meet the Client's investment objectives and individual needs.

Although Horowitz allows the Client to impose restrictions on investing in certain securities or types of securities, note that Restrictions imposed by clients will affect the composition and performance of portfolios. For these reasons, performance of portfolios within the same investment objective may differ and clients should not expect that the performance of their portfolios will be identical with the average client of the Strategy.

Horowitz will make ongoing recommendations primarily involving: exchange-listed or over-the-counter stocks, bonds, mutual funds, exchange-traded funds (ETFs), variable or fixed annuity products, stock options or other instruments that meet the client's objectives. Given that the market will affect the value of these securities, Horowitz will monitor Client accounts on a regular basis so that it may make any necessary transactions in discretionary accounts or make any necessary recommendations to Clients in non-discretionary accounts.

However, in rare instances, Horowitz may recommend investments in initial public offerings provided the client acknowledges that investments in initial public offerings may require that the IPO be held in their account for at least thirty (30) days after such offering.

The securities mentioned above reflect a broad range of investment risk, including some securities that entail high degrees of risk, such as stock options and initial public offerings that may not be suitable for the average investor.

When appropriate to the needs of the client, Horowitz may recommend the use of trading (securities sold within 30 days), short sales, margin transactions, option writing and other hedging strategies. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated tolerance for risk.

Investment advice also may be provided on investments such as but not limited to, limited partnerships and private placement partnerships, Real Estate Investment Trusts (REITs), interests in oil and gas, equipment leasing, cable television and fast food franchising. These types of

investment will only be recommended when suitable to the client's goals and risk tolerance.

Additionally, investment advice may be offered on any investments held by a client at the start of the advisory relationship. However, recommendations for new investments will typically be limited to the securities mentioned above.

Horowitz does not provide any “wrap programs” (programs that bundle brokerage and advisory services under a single comprehensive fee) so all securities recommended by Horowitz may include additional transaction charges by the Client’s broker-dealer/custodian separate from Horowitz.

CONSULTING SERVICES

Clients can also receive investment advice on a more limited basis. This may include advice on only an isolated area of concern or a specific topic. Horowitz also provides specific consultation and administrative services regarding investment and financial concerns of the client.

Additionally, Horowitz provides advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, insurance, and/or annuity advice. However, consulting advice is not limited to these non-securities matters.

FINANCIAL PLANNING SERVICES

If the Client elects *Financial Planning Services*, Horowitz may extend the initial consultation to include discussions necessary to begin creating a financial plan or may arrange a follow-up meeting to review additional information about the Client’s finances. In any case, the Client will have the choice to:

- Consult with Horowitz on the Client’s overall financial situation and obtain a comprehensive, written financial plan; or
- Consult with Horowitz on a specific topic or an individual security.

COMPREHENSIVE FINANCIAL PLAN

Horowitz will review all aspects of the Client’s finances to prepare a written financial plan that makes comprehensive recommendations to help the Client meet their financial objectives. These areas of analysis may include: overall asset allocation, securities recommendations, insurance needs, mortgage planning, consumer debt, retirement planning, college planning, trust & estate planning, savings & budgeting, and tax planning.

Horowitz will compile this financial information and use it to construct a *Comprehensive Financial Plan* tailored to the Client’s specific financial situation. The written financial plan will typically be constructed and delivered to the Client within 90 days, provided that all information necessary to prepare the plan has been promptly provided by the client.

Clients can execute the *Comprehensive Financial Plan* on their own or Horowitz can assist in implementation. If *Portfolio Management Services* are recommended in the *Comprehensive Financial Plan*, Clients may engage Horowitz for those *Portfolio Management Services* as described above.

Should a client choose to implement the recommendations contained in the plan, Horowitz suggests the client work closely with his/her attorney, accountant, insurance agent, stockbroker and/or advisor. Implementation of financial plan recommendations is entirely at the client's discretion.

When (multiple services) both investment management or plan implementation and financial planning services are offered, there is a potential conflict of interest since there is an incentive for the party offering financial planning services to recommend products or services for which the Adviser, or a related party may receive compensation. However, financial planning clients are under no obligation to act upon any recommendations of the Adviser or to effect any transactions through the Adviser if they decide to follow the recommendations.

SEPARATE FINANCIAL PLANNING CONSULTATION

Clients may engage Horowitz on a limited basis. Horowitz is available through a *Separate Financial Planning Consultation* to make changes to a *Comprehensive Financial Plan*, discuss a specific financial topic, or evaluate a specific securities investment. Horowitz also provides specific consultation and administrative services regarding investment and financial concerns of the client.

ITEM 5: FEES AND COMPENSATION

MANAGEMENT FEE FOR PORTFOLIO MANAGEMENT SERVICES

The annual fee for Portfolio Management services will be charged as a percentage of assets under management, according to the schedule below:

Assets under management Annual Fee (%)*

<u>Asset Level</u>	<u>Percentage of Assets Under Management</u>
Up to \$1,000,000	2.00%
Over \$1,000,001	1.75%

*Horowitz will quote an exact percentage to each client based on both the nature and total dollar value of that account.

Horowitz generally requires a minimum account of \$500,000 for Portfolio Management service clients. Special portfolios may be allowed for lower amounts.

Although the above Fee Schedule applies, the accounts are assessed and billed as follows:

Schwab custodial Client accounts will be invoiced, in advance, at the beginning of each calendar *month or quarter* (depending on the billing cycle established by Horowitz) based upon the value (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance), of the client's account at the end of the previous month or quarter (depending on the billing cycle established by Horowitz). Mid-month/quarter contributions to the account (depending on the billing cycle) will also be taken into account and charged on a pro-rata basis.

Clients with accounts custodied by **Interactive Brokers** will be billed a pro-rata fee on a daily basis; calculated as the net liquidation value multiplied by the fee and divided by the number of trading days in a calendar year. This is an *automatic* feature of the account with billing information provided by Interactive Brokers.

Horowitz requests all Clients allow for the direct deduction of fees. Accordingly Clients will provide *written authorization* to their broker-dealer/custodian and Horowitz will arrange to have its management fee automatically deducted from the Client's custodial account. In this case, the Client's broker-dealer/custodian will send statements, at least quarterly, to the Client that will reflect the advisory fee paid to Horowitz but the Client should verify the accuracy of fees paid. In addition, Non-Standard assets (Annuities and other assets determined) may be managed at an agreed upon fee; at a percentage annually.

Asset Withdrawals and Additions

The client may make additions to and withdrawals from the account at any time, subject to the Registrant's right to terminate an account. Clients may withdraw account assets on notice to the Registrant, subject to the usual and customary securities settlement procedures. However, Horowitz designs its portfolios as long-term investments and asset withdrawals may impair the achievement of a client's investment objectives. Clients are advised that when/if withdrawing funds and/or closing account, there may be a delay in receiving full values as dividends and/or distributions may be pending. Additions may be in cash or securities provided that the Registrant reserves the right to liquidate any transferred securities, or decline to accept particular securities into a client's account. The Advisor may consult with the client about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Termination Provisions, Refunds and Assignment

Either party may terminate the agreement by written notice to the other within five (5) business days or by receipt of actual knowledge of the Client's death or judicial declaration of incompetency by the Advisor's responsible officials. In the event the client terminates the investment advisory services, the balance of prepaid or unearned fees (if any) shall be calculated pro rata from the date of termination and refunded to the client. As well as, any earned, unpaid fees will be due and payable. If termination occurs within five business days of entering into an agreement for such services the client shall be entitled to a full refund.

Assignment of the Agreement by Horowitz and/or the broker-dealer/custodian is prohibited without the written consent of the Client.

CONSULTING SERVICE FEES

Clients can elect consulting services based upon actual or estimated hourly charges for Horowitz to provide a review and/or analysis of a particular area of financial need for a client that is determined by the amount of time it takes to complete the process. The size, complexity, and nature of each client's personal and financial situation and the amount of time it will take to analyze and summarize their finances will have a profound impact on the cost to complete the consultation.

Consulting Services	Fee Type and Amount	
Scope of Work as Determined	\$250 to \$400	hourly fee

All fees will be detailed and agreed upon in the *Advisory Agreement* between the Client and Horowitz at or prior to the services being performed. 50% of the estimated fee may be due upon signing the *advisory agreement*, with the balance of (based on actual hours) due upon completion.

PLANNING FEES FOR FINANCIAL PLANNING SERVICES

For *Comprehensive Financial Plans*, Horowitz charges a fixed fee; however, for *Separate Financial Planning Consultations*, Horowitz charges an hourly fee.

Financial Planning Service	Fee Type and Amount	
Comprehensive Financial Plan	\$500 to \$10,000+	fixed fee
Separate Financial Planning Consultations	\$250 to \$400	hourly fee

The fee and amount of hours will vary depending on the nature and complexity of each client's circumstances and upon mutual agreement of the stated fee and/or estimate of total hours at the time the financial planning agreement is signed by the client. 50% of the above stated fees, whether fixed or estimated, may be due upon signing the *financial planning agreement*, with the balance of the fixed or hourly (based on actual hours) fee due upon presentation of the plan to the client. In certain circumstances, all fees and account minimums may be negotiated.

Other Compensation

In addition to the management and financial planning fees described above, individual IA Reps of Horowitz may also be licensed as insurance agents to sell insurance products and may receive insurance commissions for the sale of those insurance products.

This creates a conflict of interest and may offer IA Reps an incentive to recommend insurance products that produce insurance commissions for the IA Rep. When any such recommendations are made, IA Reps will disclose their commissions prior to completing any transaction and will obtain specific consent from the Client before purchasing any insurance product. Additionally, Clients always have the option to purchase insurance products through other agents not affiliated with Horowitz.

Such insurance commissions will be a marginal part (approximately 5 percent) of the IA Reps' business as their primary focus will be the investment advisory business rather than their insurance business.

Any insurance commissions will be charged separately through the insurance company or agency and remitted to the IA Rep in their capacity as an insurance agent. Horowitz will not receive any insurance commissions paid to its IA Reps.

Aside from the insurance compensation described above, neither Horowitz nor any of its IA Reps will accept any compensation for the sale of securities or other investment products.

Additional Fees

Clients may incur certain charges imposed by the *Financial Institution(s)* and other third parties such as custodial fees, charges imposed directly by a mutual fund or exchange traded fund in the account, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and will be in addition to Advisory fee.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Horowitz does not charge performance-based fees (fees based on gains) and so none of its Clients' accounts will ever be managed side-by-side any performance-based accounts.

ITEM 7: TYPES OF CLIENTS

- **Individuals:** The majority of Horowitz' clients are individuals that seek professional portfolio management
- **High Net Worth Individuals:** Occasionally, Horowitz will provide advisory services for those that seek comprehensive financial planning and tax advantaged investment strategies
- **Corporations or Businesses:** At times, Horowitz will provide advisory services to corporations and businesses seeking financial planning or management services for their organization's interests.
- **Pension and Profit Sharing Plans (but not Plan Participants):** On occasion, Horowitz may offer portfolio management services to plans of small-to medium-sized companies and their fiduciaries based upon an analysis of the needs of the plan.

The minimum investment is \$50,000 for each account opened for the TDIMG Strategy. Other strategies managed by Horowitz & Company have a suggested \$500,000 minimum per relationship.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

For *Financial Planning Services*, Horowitz analyzes the Client's financial goals and objectives, income and spending, savings and investments, risks and insurance needs, asset allocation, and tax implications. This analysis seeks to ensure that the Client's needs are addressed while making progress toward their financial goals and objectives.

For *Portfolio Management Services*, Horowitz uses fundamental and technical analysis to determine the investments in a given portfolio.

Portfolios can be structured using analytic and philosophical measures. A combination of strategic and tactical asset allocation is the basic strategy in the formation of our recommendations. Historic and projected returns may be utilized to determine the "Portfolio Model" as defined by Modern Portfolio Theory, Mean Variance Optimization, Technical, Fundamental, and Quantitative theories and other potential investment disciplines. In addition, individual securities will be researched through quantitative, fundamental and technical analysis.

In its fundamental analysis, Horowitz seeks to determine the intrinsic value of equities based on a thorough analysis of the fundamental business factors of the given stock(s) at issue. This includes: analysis of financial statements, earnings, dividends, management structure, competitive advantages, product offerings, competitors and markets. In essence, this method of analysis evaluates the overall condition of the company (or companies in a mutual fund or ETF) to determine whether it is a sound investment. The analysis applied by Horowitz may also include the use of corporate releases, as well as brokerage firm research reports and information obtained from financial periodicals and other printed media. The analysis methods of Horowitz are based upon the research of each individual company, which may lead to company visits and consultation with competitors and informed investors within the industry in question.

In addition to standard reference sources for information regarding economic conditions and corporate data, Horowitz also subscribes to several U.S and international computer pricing data/analysis and portfolio research services.

In its technical analysis, Horowitz seeks to determine the future direction of prices through the study of past market data, primarily price and volume. This is done by charting the movement of investments to identify trends and patterns used in the selection of securities to purchase and price points to buy and sell. Horowitz uses a number of stock screeners and other software to chart and analyze the movement of various investments.

Additionally, Horowitz employs its own proprietary techniques utilizing their FundSORT system. This powerful filtering and scoring system allows Horowitz to analyze and identify specific investments that meet investor's criteria. Another strategy Horowitz utilizes is "[QuantaFundaTechna](#)" a process to uncover stocks and investment opportunities that will be used in their actively traded portfolios.

Despite the fundamental, technical, and quantitative analysis performed by Horowitz, any investment in securities carries market risk and investors may lose their principal investment.

For *Portfolio Management Services*, the investment strategies used will vary depending on the Client's financial goals and risk tolerance. Generally, Clients seeking capital preservation with limited risk will be managed with passive strategies using fixed income products (e.g. bonds) and index funds whereas Clients seeking growth with greater risk will be managed with active strategies using stocks, mutual funds, ETFs, and stock options.

A more aggressive approach may be implemented if the client desires. These may include momentum (short term) trading and short positions. These may have margin trading associated

with this strategy. This will only be implemented with advance client acknowledgement. Each client will be required to complete a "suitability" form for this strategy, and will be updated at least annually. Horowitz's investment strategy may include long-term and short-term purchases, trading, and options as well as other strategies.

While Horowitz will not engage in day-trading, active strategies may entail additional risk due to a greater frequency in transactions, which may involve additional brokerage fees, transaction costs, and taxes. Also, strategies that use options may entail additional risk as losses may exceed those seen in the underlying stock. Lastly, strategies that include private placement offerings entail greater risk as these offerings have limited regulatory oversight, have less liquidity, and depend on the due diligence of the investor or investment adviser.

ITEM 9: DISCIPLINARY INFORMATION

Neither Horowitz nor any of its related persons (including management and IA Reps) have had any legal or disciplinary events in their past. Clients and prospective Clients can always view the CRD records (registration records) for Horowitz or any of its IA Reps through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov or through FINRA's BrokerCheck database online at www.finra.org/brokercheck if the IA Rep is also a broker-dealer agent. The CRD number for Horowitz is 106737 and the CRD numbers for management and IA Reps are listed in the accompanying *BROCHURE SUPPLEMENT* document

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

While Horowitz is not an insurance agency, IA Reps of Horowitz may be licensed as an independent insurance agent and have affiliations with the various insurance companies whose products they sell. Specifically, Andrew A. Horowitz is licensed as an independent insurance agent in Florida and other States. As an IA Rep of Horowitz, Mr. Horowitz may recommend insurance products and may also, as an independent insurance agent, sell those recommended insurance products to Clients. When such recommendations or sales are made, a conflict of interest exists as Mr. Horowitz earns insurance commissions for the sale of those products, which may create an incentive to recommend such products. Horowitz requires that all IA Reps disclose this conflict of interest when such recommendations are made. Also, Horowitz requires IA Reps to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with Horowitz.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

Pursuant to SEC Rule 204A-1, Horowitz has a Code of Ethics that promotes the fiduciary duty of Horowitz and its IA Reps. The Code of Ethics articulates the importance of trust as a foundation to the relationship between an investment adviser and its Clients and establishes policies and

procedures to ensure that Horowitz and its IA Reps place the interests of the Clients first. The Code of Ethics requires that Horowitz and its IA Reps adhere to all applicable securities and related laws and regulations. The Code of Ethics also requires Horowitz and its IA Reps follow industry “best practices” involving: confidential information, suitability of investments, personal trading on the part of Horowitz and its IA Reps, outside business activities of IA Reps, and the disclosure of conflicts of interest.

A copy of the Adviser’s Code of Ethics is available upon request for any Client or prospective Client.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

While Horowitz has no proprietary interest in Client transactions, its IA Reps may have a financial interest in those recommended transactions that involve the purchase of an insurance product. As explained in the “OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS” section (page 11), Andrew A. Horowitz is licensed as an independent insurance agent in Florida and other States. As an IA Rep of Horowitz, Mr. Horowitz may recommend insurance products and may also, as an independent insurance agent, sell those recommended insurance products to Advisory Clients. When such recommendations or sales are made, a conflict of interest exists as Mr. Horowitz will earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. Horowitz requires that all IA Reps disclose this conflict of interest when such recommendations are made. Also, Horowitz requires IA Reps to disclose that Advisory Clients may purchase recommended insurance products from other insurance agents not affiliated with Horowitz.

Additionally, IA Reps of Horowitz may have an interest in Client transactions insofar as they may personally invest in the same securities recommended to Advisory Clients. These transactions involve a conflict of interest as Horowitz or IA Reps may benefit from an increase in price from subsequent purchases by Advisory Clients. To address this conflict of interest, Horowitz and its IA Reps will adhere to the following procedures regarding their personal trading:

- Client transactions will always be placed ahead of those for Horowitz, its management, and its IA Reps;
- When participating in the allocation of a block of stock purchased or sold at multiple prices for clients, no employee or officer of Horowitz can allocate stock to his or her own account (or a family related) account at a more favorable price than any client received. Likewise, an employee or officer of Horowitz may only make an individual trade for his or her own (or family related) account, when new positions are established or existing positions liquidated, only after all client allocations are filled. This policy covers all types of securities trading including options;
- If a decision is made by a portfolio manager to reduce current clients’ positions on a percentage basis, then an employee or officer of Horowitz may likewise reduce, but only after all client positions are satisfied. This policy covers all types of securities trading including options;
- No employee or officer of Horowitz may trade securities on the basis of material, nonpublic information;

- As a general rule, employees and officers of Horowitz, as fiduciaries, pledge to the firm's clients "an affirmative duty of utmost good faith and full disclosure of all material facts".
- All personal securities transactions shall be reviewed and approved on a daily basis by Compliance

ITEM 12: BROKERAGE PRACTICES

BROKERAGE PRACTICES

Horowitz may recommend the use of one of several broker dealers including but not limited to: **Charles Schwab & Company, Inc.** (hereinafter "Schwab"), **Interactive Brokers** (hereinafter "IB"), and/or other broker dealers, provided that such recommendation is consistent with Horowitz's fiduciary duty to the client. Schwab and IB are all unaffiliated, independent FINRA registered broker- dealers. Horowitz clients must evaluate recommended brokers before opening an account. The factors considered by Horowitz when making this recommendation are the broker's ability to provide professional services, Horowitz's experience with the broker, the broker's reputation, and the broker's quality of execution services and costs of such services, among other factors.

Clients have no obligation to use the above mentioned broker-dealer and/or custodian, but if Clients seek to use a particular broker or dealer, it should be understood that Horowitz will not have authority to negotiate commissions or obtain volume discounts and best execution may not be achieved. As such, Clients may not receive the lowest price possible if they were to have their trades directed to specific brokers.

RESEARCH AND OTHER SOFT DOLLAR BENEFITS

Schwab Institutional provides Horowitz 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 minimum amount of the advisor's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon Horowitz committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, 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.

Schwab Institutional also makes available to Horowitz other products and services that benefit Horowitz but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of Horowitz's accounts, including accounts not maintained at Schwab.

Interactive Brokers, LLC (IB) provides Horowitz with access to its software platform. This service is not contingent upon Horowitz committing to IB any specific amount of business (assets in custody or trading commissions). When the software platform is utilized to manage their accounts, Horowitz clients will pay a brokerage commission in excess of that which they would normally pay for effecting the same transaction at IB, in recognition of the value of the service. This is commonly referred to as a "soft dollar" relationship. However, even with this

additional charge, Horowitz clients typically will pay less commission per transaction than another broker-dealer may charge for effecting the same transaction. For certain clients' accounts and under certain circumstances, it is conceivable that another broker-dealer may charge less for effecting the same transaction. This may create a conflict of interest as Horowitz may route orders through IB even though another brokerage may charge less or provide a better execution price for effecting the same transaction. When such directed trades are made, a conflict of interest exists as Mr. Horowitz earns soft dollars for such transactions, which may create an incentive to recommend/direct IB over other broker-dealers.

Under this arrangement, the software being used by Horowitz will from time to time effect transactions, subject to the parameters predetermined and agreed upon with the client, through IB and Horowitz. A portion of the commission from those transactions will be allocated to Horowitz's segregated "master account" maintained at IB. Horowitz will then pay IB for its use of their software platform, research or other services. However, Horowitz is ultimately obligated to pay for such services with hard dollars if soft dollar transactions do not develop. IB services involved are used solely for the benefit of the client(s) in whose account(s) the commissions are incurred. As trading facilitates the soft dollar process it may be conceived as a potential conflict that Horowitz may trade in excess in order to obtain soft dollars.

Horowitz's use of soft dollars for the IB software platform is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities.

DIRECTED BROKERAGE AND AGGREGATED ORDERS

Horowitz participates in various institutional service programs. While there is no direct linkage between the investment advice given and participation in these programs, economic benefits are received which would not be received if Horowitz did not give investment advice to clients.

Schwab's products and services that assist Horowitz in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of Horowitz fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help Horowitz manage and further develop its business enterprise. In evaluating whether to recommend or require that clients custody their assets at Schwab, Horowitz may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Block Allocations of Client Trades: Horowitz may purchase and/or sell the same security for many accounts, even though each client account is individually managed. When possible, Horowitz may also aggregate the same transaction in the same securities for multiple clients, at

the same time. Clients in aggregated transactions each receive the same price per unit, although they may pay differing brokerage commissions depending upon the nature of their directed brokerage arrangement, if any.

If more than one price is paid for securities in an aggregated transaction, each client in the aggregated transaction will typically receive the average price paid for the block of securities in the same aggregated transaction on that day. If Horowitz is unable to fill an aggregated transaction completely, but receives a partial fill of the aggregated transaction, Horowitz will normally allocate the filled portion of the transaction to clients based on an equitable rotational system that considers a random assignment of client accounts in its portfolio accounting system.

Accounts held in custody at firms which do not permit Horowitz to place transactions with other brokerage firms may not be able to participate in the initial transaction and may not be able to participate in the same gains or losses as other clients whose accounts are not so restricted. Clients with specific investment policies or restrictions may not be able to participate in aggregated transactions and may only be invested in such issues after compliance with the investment policies or restrictions has been established. Such clients may receive a less favorable price on such transactions.

ITEM 13: REVIEW OF ACCOUNTS

PORTFOLIO MANAGEMENT: While the underlying securities within Portfolio Management service client accounts are continuously monitored, these accounts will be formally reviewed at least quarterly.

More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

In addition to the monthly statements and confirmations of transactions that Portfolio Management service clients receive from their broker dealer, Horowitz may provide quarterly reports to clients consisting of performance return analysis, taxable cost basis, position summary and transaction ledgers.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

Horowitz may from time to time compensate, either directly or indirectly, any person (defined as a natural person or a company) for client referrals. The principals of the company may have a business arrangement with their referring network of professionals (i.e., CPA's and estate planning attorneys). Network members may contribute to marketing expenses for seminars, advertisements, mail, etc. In addition, referral fees may be paid to other professionals allowable under 206(4) of the Act. When third party financial advisers refer clients to Horowitz, Horowitz may, from time to time, compensate these advisers, either directly or indirectly. Horowitz is aware of the special considerations promulgated under Section 206(4)-3 of the Act. Accordingly, all solicitors' agreements are in compliance with that act. Written instruments are maintained by Horowitz and all applicable federal and state laws are observed. All clients referred by solicitors are given full written disclosures describing the terms and fee arrangements between the adviser

and the solicitor. Compensation paid by Horowitz to outside advisers does not increase the fee, which the firm would otherwise charge for its investment management services.

Horowitz has enlisted Bernice Stander and Mel Friedberg, PA as known solicitors. Others may be added from time to time.

ITEM 15: CUSTODY

Clients will engage an independent broker-dealer and/or custodian to maintain their accounts and so Horowitz will not have *physical* custody of Clients' assets, monies, or securities. Accordingly, Clients will only receive account statements from their broker-dealer and custodian (though Horowitz may send invoices or other communication), at least quarterly.

Horowitz urges you to carefully review such statements and compare such official custodial records to the performance reports we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

ITEM 16: INVESTMENT DISCRETION

For discretionary clients, Horowitz requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold.

Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.

ITEM 17: VOTING CLIENT SECURITIES

For any security that entails a voting right in the underlying company, Horowitz will not have or accept authority to vote Client securities. All voting issues, proxies, and solicitations will be communicated to Advisory Clients through the Client's custodian.

ITEM 18: FINANCIAL INFORMATION

Horowitz would be required to disclose additional financial information if it were to charge fees in advance, but as described in the "ADVISORY BUSINESS" section (pages 3-5 of this *FIRM BROCHURE*), Horowitz charges all advisory fees in arrears, upon delivery of a plan, or at the conclusion of a consultation. In any case, Horowitz, its management and IA Reps have no material financial information (e.g. bankruptcies, liens, judgments) in their backgrounds.

ITEM 19: REQUIREMENTS FOR STATE REGISTERED ADVISERS

Horowitz has only two principal executive officers (or management persons): Andrew A. Horowitz and Kevin Hoffmann. Their biographical information is given below or on the attached *BROCHURE SUPPLEMENT* document.

Kevin Hoffmann is an integral part of the Horowitz team who provides service and research. He joins us from JMG Financial Group in Chicago. Kevin began his career in May of 2001 working on the floor of the Chicago Board of Trade as a clerk for a commodities trader.

While attending the University of Wisconsin at Madison he served a Financial Consultants Internship with Smith Barney in 2003. In 2004 Kevin graduated from UW-Madison with a bachelor's degree in Personal Finance and assumed a position as a derivatives trader for BMT Trading Group / Gelber Group. By October of 2005 he had become a Financial Planning Analyst for JMG Financial Group where he assisted with Financial & Tax Planning as well as Investment Management for high net worth clientele.

Under the "FEES AND COMPENSATION" section of this *FIRM BROCHURE*, the subsection titled "*OTHER COMPENSATION*" explains that IA Reps of Horowitz may also be licensed as insurance agents and may receive insurance commissions for the sale of insurance products. This activity and the conflicts of interest associated with it are discussed at greater length in the "*OTHER COMPENSATION*" subsection on page 7 of this *FIRM BROCHURE*.

Horowitz would be required to disclose additional information if it: were to charge performance based fees; had any other relationship or arrangement with any issuer of securities; or was ever found liable in either: (a) an arbitration, or (b) a civil, self-regulatory organization, or administrative proceeding. Andrew A. Horowitz has disclosure detail of which can be found through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov. The CRD Number for Andrew A. Horowitz is 1521621.

(Part 2B of Form ADV)

Supervised Person(s):

Andrew A. Horowitz

HOROWITZ & COMPANY

1555 NorthPark Drive
Suite #102
Weston, Florida 33326
954-349-0800

May 2012

PURPOSE OF THE BROCHURE SUPPLEMENT:

This *BROCHURE SUPPLEMENT* provides information about Andrew A. Horowitz that supplements the Horowitz & Company, Inc. *FIRM BROCHURE* document. You should have received a copy of that *FIRM BROCHURE*. Please contact Kevin Hoffmann at www.Horowitzandcompany.com, if you did not receive Horowitz & Company, Inc.'s *FIRM BROCHURE* or if you have any questions about the contents of this *BROCHURE SUPPLEMENT*.

Additional information about Andrew A. Horowitz is available on the SEC's website at www.adviserinfo.sec.gov (the CRD number for Andrew A. Horowitz is 1521621).

NOTE:

While Horowitz & Company, Inc. may refer to itself as a "registered investment advisor" or "RIA" Clients should be aware that registration itself does not imply any level of skill or training.

EDUCATION AND BUSINESS STANDARDS

Horowitz requires the successful acquisition of a college degree, or demonstrated and successful business experience, or combination of both, and requisite continuing education. Related employees of Horowitz may also be required to have examinations based on specific state examination requirements and continuing education requirements.

Andrew A. Horowitz (b. 1965), President of Horowitz & Company, Inc.

Andrew Horowitz, CFP, President of Horowitz & Company, has practiced financial planning in South Florida since the late 1980's, providing the kind of professional financial planning that a successful portfolio demands. His investment management technique tempered with a personal touch.

Designations

Achieved the Certified Financial Planner ("CFP") designation awarded by the International Board of Standards and practices for Certified Financial Planners, Inc., in 1991

Business Background

Horowitz & Company, Inc., *President, CCO, IAR* (1991-Present)

Prime Capital Services, Inc., *Registered Representative* (1997-2007)

Royal Alliance, *Registered Representative* (1991-1997)

Mass Mutual Life LLC, *Financial Planner* (1987-1992)

MML Investor Services, Inc., *Registered Representative* (1987 – 1991)

DISCIPLINARY INFORMATION

Andrew A. Horowitz has not had any legal or disciplinary events in their past. Clients and prospective clients can view the CRD records (registration records) for Mr. Horowitz through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov or FINRA's BrokerCheck database online at www.finra.org/brokercheck. The CRD number for Andrew A. Horowitz is 1521621.

OTHER BUSINESS ACTIVITIES

In addition to being an investment adviser representative (hereafter "IA Rep") of Horowitz & Company, Inc. (hereafter "Horowitz"), Andrew A. Horowitz is a licensed independent insurance agent in Florida.

Mr. Horowitz as an IA Rep of Horowitz may make recommendations on insurance products and may also, as an independent insurance agent, sell those recommended insurance products to advisory clients. When such recommendations or sales are made, a conflict of interest exists as Mr. Horowitz may earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. Horowitz requires that Mr. Horowitz disclose this conflict of interest when such recommendations are made. Also, Horowitz requires Mr. Horowitz to disclose that advisory clients may purchase recommended insurance products from other insurance agents not affiliated with Horowitz.

Mr. Horowitz is an author on investing; such as "The Disciplined Investor". Mr. Horowitz as the writer may make recommendations to purchase the book and offer to sell the book to advisory clients. When

such recommendations or sales are made, a conflict of interest exists as Mr. Horowitz may receive revenue for the sale of the book, which may create an incentive to recommend such book. Horowitz requires that Mr. Horowitz disclose this conflict of interest when recommendations are made. The disciplines and strategies as described in his book and employed in his practice may not be for every investor. Careful consideration should be taken as to the degree of risk one can tolerate.

ADDITIONAL COMPENSATION

Aside from the sales commissions paid by insurance companies to Andrew A. Horowitz (see the “OTHER BUSINESS ACTIVITIES” section above), Mr. Horowitz does not receive any additional compensation from non-clients for providing advisory services. All advisory compensation is paid by clients directly.

SUPERVISION

As President and CCO of Horowitz, Andrew A. Horowitz is primarily responsible for supervision of Horowitz and its IA Reps. As Mr. Horowitz is an IA Rep himself, his accounts are also reviewed by the Operations Manager of Horowitz; Kevin Hoffmann.

Andrew A. Horowitz, President (954) 349-0800
Kevin Hoffmann, Operations Manager (954) 349-0800

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Horowitz would be required to disclose additional information for Andrew A. Horowitz if he had ever been the subject of a bankruptcy petition or ever been found liable in either: (a) an arbitration; or (b) a civil, self-regulatory organization, or administrative proceeding. Andrew A. Horowitz has disclosure detail of which can be found through the SEC’s Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov. The CRD Number for Andrew A. Horowitz is 1521621.