

Firm Brochure
(Part 2A of Form ADV)

**The Retirement Planning Company
Of New England, Inc.
&
Mystic Asset Management, Inc.**

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This brochure provides information about the qualifications and business practices of The Retirement Planning Company of New England, Inc. If you have any questions about the contents of this brochure, please contact us at: (401) 453-5558, or by email at: sam@100shares.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 The Retirement Planning Company of New England, Inc. is available on the SEC's website at www.adviserinfo.sec.gov

March 6, 2012

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: PHONE or by email at: sam@100shares.com

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Advisory Business

Firm Description

The Retirement Planning Company of New England, Inc. ("RPC") was founded in 1996. In 2002, Sotirios (Sam) Pappas and David Allaire of RPC acquired Mystic Asset Management Inc., ("MAM"), which became a subsidiary of RPC, collectively ("The Firm")

The Firm is a fee-based investment advisor that specializes in providing comprehensive financial counseling services designed to meet personal and/or corporate needs. The Firm provides highly personalized discretionary and non-discretionary continuous and ongoing investment advisory services to individuals, corporations, trusts, sole proprietors, partnerships and pension & profit sharing plans.

The Firm's principals are affiliated with a Broker/Dealer; however, no equity transactions are executed on behalf of investment advisory clients for a commission. Through the Firm's relationship with the Broker/Dealer, it has the ability to offer 401K retirement plans, 529 college plans, other types of pension and profit sharing plans, annuities, insurance products, limited partnerships, private placements, 1031 exchanges or other commissioned type products to clients. Should a commission product be utilized for an investment advisory client of The Firm, it is fully disclosed to the client.

The Firm has relationship with other professionals in which they compensate for client referrals. The Firm follows Rule 206(4)-(4)(b) of the Investment Advisors Act, which outlines the disclosure requirements of a solicitor.

The Firm offers comprehensive financial planning services on a fee basis. Plans are designed based upon the financial planning process, which includes;

- Establishing the client/planner relationship
- Gathering of all financial data and establishing goals
- Analysis of information
- Design of the financial plan with observations and recommendations to reach clients stated goals and objectives
- Assistance in implementing the plan
- Monitoring of the plan (with regular client/planner meetings) to make sure objectives and progress are being met over time

The mission in the planning process is to identify the issues and concerns that are important to the client, then design and implement the path to reach those goals. The financial plan can be focused on a single issue, such as college funding or investment management, or comprehensive, encompassing all areas of a client's financial affairs.

Financial planning fees are generally based upon a flat amount. All fees depend upon the level and complexity of the services required, not the value of the client's assets. Plans may involve consultation with other professionals, such as attorneys and accountants. Part of our service is to assist clients during such consultations to ensure their interests are being met. All fees are thoroughly disclosed and agreed upon between the client and the advisor during the initial meetings. If necessary, fee arrangements based on an hourly rate or on an annual retainer basis are also available.

The Firm does not act as a custodian of client assets. An independent third party custodian is utilized and the Firm places trades for clients under a limited power of attorney. Additionally, the Firm has the ability to collect its investment advisory fees directly from the client's account. Currently, TD Ameritrade is the primary custodian recommended to clients. Other custodians can be used; however, should another custodian be utilized, it can impact the reporting on the account.

The Firm speaks to and/or visits clients at least semiannually to review accounts with them. More frequent internal reviews occur, but are not necessarily communicated to the client unless changes to investment strategy are recommended. Additionally, we are always available to speak to clients anytime they call, email or fax us.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. The Firm or its representatives do not currently have conflicts of interest, of which they are aware, with other professionals the client may employ, however, if such conflicts of interests are discovered, they will be fully disclosed to the client at that time.

The initial meeting is usually 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.

Principal Owners

RPC – David Allaire is 100% stockholder

MAM – David Allaire and Sam Pappas each own 50%

Types of Advisory Services

The Firm provides discretionary and non-discretionary investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment advice through consultations;

On more than an occasional basis, The Firm furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of 12/31/11, The Firm manages approximately \$208.6 million in assets for approximately 698 accounts. Approximately \$ 127.8 million is managed on a discretionary basis, and \$80.8 is managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented in our client files or by discussions with clients directly. Additionally, where requested, Investment policy statements are created that reflect the stated goals and objective of that client. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$450.00 and can be much higher depending on the level of service required. Fee may be negotiable, but at representatives discretion. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month. Follow-on implementation work is billed separately at the rate of \$125.00 per hour.

Advisory Service Agreement

The Firm manages client assets in a discretionary or non-discretionary capacity.

The Firm develops a diversified portfolio tailored to meet each client's specific needs while taking into consideration risk tolerances and goals. All aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals may be defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets. Currently, there are several sliding fee scales employed by the Firm. An example of a fee schedule is provided below:

1.25% on the first \$250,000;
1.00% on the next \$250,000;
.90% on the next \$500,000;
.75% on the next \$500,000;
.60% on the next \$1,000,000
In excess of \$2,500,000 fee is Negotiable

The representative that you are working with will be able to provide you the fee schedule that they are utilizing and the exact fee will be specified in your investment advisory contract.

The Firm reserves the right to employ a minimum and/or annual fee, which would be fully disclosed and discussed with the client and in writing. Current client relationships exist where the fees are higher or lower than the fee schedule above. Additionally, fees may be billed in arrears or in advance.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed or if the account is billed in advance, fees will be returned to client on a pro rata basis.

Retainer Agreement

In some circumstances, a *Retainer Agreement* is executed in lieu of an *Advisory Service Agreement* when it is more appropriate to work on a fixed-fee basis. The annual fee for a *Retainer Agreement* is negotiable depending on the amount of work required.

Investment Management Agreement

Please refer to Advisory Service Agreement above.

Tax Preparation Agreement

Currently we are not involved in any tax preparation work.

Hourly Planning Engagements

The Firm provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$125.00.

Asset Management

Assets are invested primarily in individual stocks and bonds. Additionally, the Firm may use no-load mutual funds and exchange-traded funds. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. The custodian may charge a transaction fee for the purchase of some funds.

Securities (stocks & bonds) may be purchased or sold through our custodian. The custodian (TD Ameritrade) charges a fee for stock and bond trades. The Firm does not receive any direct cash compensation from these custodians.

Additionally, the Firm may utilize outside bond securities dealers to supplement the bond department of TD Ameritrade as not all “bond desks” are created equal. Certain bond dealers may have access to or hold bonds in inventory that others do not. The Firm will always attempt to purchase a fixed income security (bond) for the client at the most favorable final price to the client. In doing so, the bond purchase could potentially result in direct compensation to the The Firm from the bond securities dealer. This compensation would be in addition to the asset management fee assessed to the client.

Securities may also include, but not limited to: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

The firm does have access to Initial public offerings (IPOs). IPO's will be allocated based suitability and cash availability in client accounts.

Termination of Agreement

A Client may terminate any of the aforementioned agreements upon ten (10) days written notice to the Firm and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, The Firm will refund any unearned portion of the advance payment.

The Firm may terminate any of the aforementioned agreements upon ten (10) days written notice to the client. If the client made an advance payment, The Firm will refund any unearned portion of the advance payment.

Fees and Compensation

Description

The Firm bases its fees on a percentage of assets under management, hourly charges and fixed fees.

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees can be negotiable.

Fee Billing

Investment management fees are billed monthly or quarterly, in *ADVANCE* or *ARREARS*, meaning that we invoice you *BEFORE* or *AFTER* the three-month or month billing period has *BEGUN* or *ENDED*. Payment in full is expected upon invoice presentation. Fees are usually deducted from a client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. Additionally, custodians may charge fees for services other than investment related, i.e., overnight mail, wires, debit cards, checking, account setup fees, account termination fees, etc.

The firm does not share or receive any of the aforementioned fees nor any of the fees/commissions as a result of any equity purchases or sales executed through TD Ameritrade. However, the Firm may utilize outside bond

securities dealers to supplement the bond departments of our current custodians (see “Asset Management” section on page 5 for expanded explanation).

The Firm, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to the Firm.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

The Firm reserves the right to stop work on any account that is more than a 30 days overdue. In addition, the Firm reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in the Firm’s judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

The Firm does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

The Firm generally provides investment advice to individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, nonprofit and charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$500,000 of assets under management, which equates to an annual fee of \$5,625 based on the aforementioned fee schedule.

The Firm has the discretion to waive the account minimum. Other exceptions will apply to employees of The Firm and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

The investment strategy will vary by client depending on what the client's objectives and goals are.

Risk of Loss

All investment programs have certain risks that are 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.

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors 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.
- **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. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **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.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, 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.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

Several of the Firm's representatives are registered/licensed with a securities broker-dealer and various insurance companies.

Affiliations

The Firm has arrangements that are material to its advisory or its clients with a related entity that is a broker-dealer. Several of the Firm's representatives are registered representatives of Ridgeway & Conger, Inc., member FINRA/SIPC

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

Code of Ethics

The employees of The Firm have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

The Firm and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Firm's *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of The Firm is Sam Pappas. He reviews all employee trades each quarter. His trades are reviewed by David Allaire. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

Brokerage Practices

Selecting Brokerage Firms

The Firm does not recommend custodians to clients in which they have any affiliation with product sales. Specific custodian recommendations are made to Clients based on their need for such services. The Firm recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

The Firm recommends discount brokerage firms and trust companies (qualified custodians), such as TD Ameritrade and Dime Bank Trust.

The Firm does not receive fees or commissions from any of these arrangements.

Based on Part I, Item 5, I (1-2), The Firm does not participate in WRAP and therefore Wrap language is not found and is not required in the ADV.

The Firm participates in institutional advisor program (the "Program") offered by TD Ameritrade Institutional ("TD"). TD is a division of TD Ameritrade, Inc., member FINRA/SIPC/NFA, ("TD Ameritrade") an unaffiliated SEC-registered broker dealer and FINRA member. TD offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. The Firm receives some benefits from TD through its participation in the Program.

As disclosed above, the Firm participates in TD Ameritrade's institutional customer program and may recommend TD to clients for custody and brokerage services. There is no direct link between the Firm participation in the program and investment advice it gives to its Clients, although the Firm receives economic benefits through its participation in the program that are not available to TD 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 the Firms participants; access to block trading; 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; research, technology and practice management products or services provided to the Firm by third party vendors. Some of the products and services made available by TD may benefit the Firm but may not benefit its Clients. Generally these products or services benefit the Firm in managing and administering Client Accounts, including accounts not maintained at TD. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transaction directed to TD. As part of its fiduciary duties to clients, the Firm endeavors at all times to put the interests of its clients first. Clients should be aware, however, that receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD for custody and brokerage services.

Best Execution

The Firm reviews the execution of trades at each custodian. The Firm does not receive directly any portion of the trading fees.

Soft Dollars

Generally, in addition to a broker's ability to provide "best execution", we may also consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. This is known as paying for those services or products with "soft dollars". Because many of the services or products could be considered to provide a benefit for the firm, and because the "soft dollars" used to acquire them are client assets, the firm could be considered to have a conflict of interest in allocating client brokerage business: it could receive valuable benefits by selecting a particular broker or dealer to execute client transactions and the transaction compensation charged by that broker or dealer might not be the lowest compensation the firm might otherwise be able to negotiate. In addition, the firm could have an incentive to cause clients to engage in more securities transactions that would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services.

The firm's use of soft dollars 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. As required by Section 28(e), the firm will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker, we generally determine, considering all the factors described below, that the compensation to be paid to TD is reasonable in relation to the value of all the brokerage and research products and services provided by TD. In making this determination, we typically consider not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but also the value of those services and products in our performance of our overall responsibilities to all of our clients. In some cases, the commissions or other transaction fees charged by a particular broker-dealer for a particular transaction or set of transactions or set of transaction may be greater than the amounts another broker-dealer who did not provide research services or products that might charge.

Order Aggregation

Whenever possible trades are aggregated for clients provided there is a benefit.

Review of Accounts

Periodic Reviews

Account reviews are performed quarterly by representatives of the Firm. However, individual holdings are reviewed on a continuous basis. Without question, account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Clients receive periodic communications; *Investment Management* clients may receive written quarterly updates. The written updates may include a portfolio report with sector diversifications.

Client Referrals and Other Compensation

Incoming Referrals

The Firm has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. Additionally, The Firm has arrangements with specific individuals where it compensates for referrals.

Referrals Out

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

Other Compensation

Not applicable

Custody

Account Statements

All assets are held at a qualified custodian, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by The Firm.

Net Worth Statements

Clients may be provided net worth statements and net worth graphs that are generated from our client relationship management system.

Investment Discretion

Discretionary Authority for Trading

The Firm accepts discretionary authority to manage securities accounts on behalf of clients. The Firm has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, some clients prefer the Firm consults with them prior to each trade.

The client approves the custodian to be used. The Firm does not receive any portion of the transaction fees or commissions paid by the client to the custodian on trades.

Discretionary trading authority facilitates placing trades in client accounts on your behalf so that we may promptly implement the investment policy that was discussed.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

The Firm does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, The Firm will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

The Firm does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because The Firm 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.

Business Continuity Plan

General

The Firm has an evolving Business Continuity Plan that provides steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan also covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, Internet outage, railway accident and aircraft accident. Currently, electronic files are backed up daily/weekly and archived offsite.

Alternate Offices

Alternate offices will be identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

The Firm has several Key personal. It is expected that if there was a loss of a key personal, the other(s) would step in.

Information Security Program

Information Security

The Firm maintains an information security program (firewall) to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

The Firm is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change.

Education and Business Standards

There is no formal education or business standards; however, the Firm has not hired any new Advisor or back office individuals to assist in the management and operations for existing clients for some time. Should there be a need in the future, all aspects of any candidates background will be examined and scrutinized.

Professional Certifications

Certain representatives of the Firm have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner™ (CFP®): Certified Financial Planner™ are practitioners granted the use of the CFP mark by the CFP Board of standards to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.
- Successful completion of the three-part IRS Special Enrollment Examination (SEE), or completion of five years of employment by the

IRS in a position which regularly interpreted and applied the tax code and its regulations.

- Successfully pass the background check conducted by the IRS.

David Allaire (Owner / Representative)**Educational Background:**

- Date of birth: 7/24/1965
- B.S. Finance University of Rhode Island

Business Experience:

- The Retirement Planning Company of New England, Inc. - 9/1998 - present
- Ridgeway & Conger, Inc. – 12/2010 – present
- Cambridge Investment Research – 1/99 – 12/2010
- Mystic Asset Management, Inc. – 9/02 – present
- The Retirement Planning Company of New England, LLC – 4/96 – 9/98
- Securities Service Network – 1/98 – 1/99
- Securities America – 10/96 – 1/98

Disciplinary Information: None

Other Business Activities: Route One Properties, LLC –Member

Other RE Ventures

Additional Compensation: Commissions from Ridgeway & Conger, Inc.

Supervision:

David Allaire is supervised by Sotirios Pappas.

SUPERVISOR'S contact information:

PHONE 401-453-5558

EMAIL sam@100shares.com

Sotirios "Sam" Pappas (Owner / Representative)**Educational Background:**

- Date of birth: 11/16/1970
- B.S. Finance University of Massachusetts

Business Experience:

- Mystic Asset Management, Inc. – 9/02 – present
- The Retirement Planning Company of New England, Inc – 5/01 – present
- Ridgeway & Conger, Inc. – 11/2010 – present
- Cambridge Investment Research 5/01 – to 11/10
- Pappas Asset Management, Inc. – 4/00 – 5/01
- John Hancock Life Insurance Co. – 10/98 – 3/00

Kevin Worthley is supervised by David Allaire

SUPERVISOR'S contact information:

PHONE: 401-453-5558 EMAIL: invest@100shares.com

Henry “Robin” Honiss, CFA (Investment Management Consultant)

Educational Background:

- Date of birth: 4/21/1937
 - MBA – Dartmouth College, Amos Tuck School
 - B.S. – Boston University

Business Experience:

- Mystic Asset Management, Inc. – 9/02 – present (as investment management consultant)
- Mystic Asset Management – 1/93 – 9/02
- New England Savings Bank – 3/89 – 11/92

- Disciplinary Information: None

Other Business Activities: Honiss Consulting

Additional Compensation: None

Supervision:

Robin Honiss is supervised by Sam Pappas

SUPERVISOR'S contact information:

PHONE: 401-453-5558 EMAIL: sam@100shares.com

Leah Alvanos (Representative)

Educational Background:

- Date of birth: 10/14/1945
- University of Massachusetts
- Harvard University
- Northeastern University – Certified Mortgage Banking

Business Experience:

- Retirement Planning Co. of New England, Inc. 10/09 – present

- Ridgeway & Conger, Inc. 12/10/ - present
- Cambridge Investment Research, Inc. 10/09 to 12/10
- Strategic Financial Partners 9/08 to 9/09
- Kaleidoscope 7/89 – Present

- Disciplinary Information: None

Other Business Activities: Kaleidoscope and Brighton Real-estate Group

Additional Compensation: Commissions from Ridgeway & Conger, Inc.

Supervision:

Leah Alvanos is supervised by David Allaire and Sam Pappas

SUPERVISOR'S contact information:

PHONE: 401-453-5558 EMAIL: sam@100shares.com