

Item 1 – Cover Page

Bryant Woods Investment Advisors LLC
Dba Landmark Wealth Management

45 Bryant Woods N, Amherst, NY 14228

716-630-2441

www.landmarkfirm.com

December 31, 2011

This Brochure provides information about the qualifications and business practices of Bryant Woods Investment Advisors, LLC dba Landmark Wealth Management. If you have any questions about the contents of this Brochure, please contact us at 716-630-2441 or by email at info@landmarkfirm.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.

Landmark Wealth Management is a registered investment adviser. Registration of an Investment Adviser with the SEC and other state securities authorities does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Landmark Wealth Management also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Landmark Wealth Management is 109379.

Item 2 – Material Changes

In November 2011, we changed our name from Odyssey Advisors to Landmark Wealth Management. As of the same date, we changed our ownership structure and brought in a new Principal, Brian K. Laible. Prior to his joining us, Mr. Laible conducted an investment advisory business through his company, Advanced Wealth Management Group, LLC (“Advanced Wealth”). In conjunction with Mr. Laible joining us, we will be merging our business with the business of Advanced Wealth in order to provide greater support to our clients and the clients of Advanced Wealth. This Brochure has been amended to provide information regarding our combined business.

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

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Mark P. Collard directly, at 716-630-2441 or by emailing a request via info@landmarkfirm.com. Our Brochure is also available on our company’s website at www.landmarkfirm.com, free of charge.

Additional information about Landmark Wealth Management is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Landmark Wealth Management who are registered, or are required to be registered, as investment adviser representatives of Landmark Wealth Management.

Item 3 -Table of Contents

<u>Item 1 – Cover Page</u>	i
<u>Item 2 – Material Changes</u>	ii
<u>Item 3 -Table of Contents</u>	iii
<u>Item 4 – Advisory Business</u>	1
<u>Item 5 – Fees and Compensation</u>	1
<u>Item 6 – Performance-Based Fees and Side-By-Side Management</u>	3
<u>Item 7 – Types of Clients</u>	3
<u>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</u>	3
<u>Item 9 – Disciplinary Information</u>	7
<u>Item 10 – Other Financial Industry Activities and Affiliations</u>	7
<u>Item 11 – Code of Ethics</u>	11
<u>Item 12 – Brokerage Practices</u>	12
<u>Item 13 – Review of Accounts</u>	13
<u>Item 14 – Client Referrals and Other Compensation</u>	14
<u>Item 15 – Custody</u>	15
<u>Item 16 – Investment Discretion</u>	15
<u>Item 17 – Voting Client Securities</u>	15
<u>Item 18 – Financial Information</u>	15
<u>Item 19 – Requirements for State-Registered Advisers</u>	16
Brochure Supplement(s)	

Item 4 – Advisory Business

Bryant Woods Investment Advisor LLC dba Landmark Wealth Management (hereafter “Landmark”) was founded in 2005. Landmark is controlled by Odyssey Advisors, Inc., a corporation which is wholly owned by our managing principal, Mark P. Collard, and Landmark Wealth Advisors LLC, a firm controlled by Brian K. Laible. The accounting firm of Chiampou, Travis, Besaw & Kershner LLP (hereafter CTBK), and Eugene Kershner, a partner of CTBK, own a minority interest in Landmark and are not actively engaged in the business of Landmark.

Landmark provides its clients with a broad range of comprehensive financial planning and consulting services to individuals, trusts, estates and small businesses and their pension and profit sharing plans. Advice is provided through consultation with our clients and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, investment management, education funding, retirement planning and estate planning.

Investment advice is an integral part of financial planning. Investment advice and management is provided with our clients providing guidance in respect to their overall risk tolerance and desired asset allocation. Landmark tailors its investment advisory services to the individual needs of clients. We consult with the clients initially and on an ongoing basis to determine risk tolerance, time horizon, and other factors that may impact the clients’ investment needs. Clients are advised to promptly notify Landmark if there are material changes in their financial situation or investment objectives. Landmark does not act as a custodian of client assets, and clients always receive regular statements and trade confirmations from an independent custodian. We place trades for clients under a limited power of attorney.

Landmark is strictly a fee-only financial planning and investment management firm. We do not sell annuities or insurance nor invest in any mutual funds or limited partnerships that pay a commission to the firm. We are not affiliated with entities that sell such financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

As of December 31, 2011, Landmark managed \$59,629,519.14 in discretionary accounts and \$19,483,421.22 in non-discretionary accounts.

Item 5 – Fees and Compensation

Landmark provides investment management services for an annual fee based upon a percentage of the market value of the assets being managed by Landmark. Landmark’s annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and

other related costs and expenses which are incurred by the client. Landmark does not, however, receive any portion of these commissions, fees, and costs.

Landmark's annual fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by Landmark on the last day of the previous quarter. The annual fee varies (up to 1.50%) depending upon the market value of the assets under management and the type of investment management services to be rendered. Landmark imposes a minimum annual fee of \$1,000.

Landmark, in its sole discretion, may negotiate to charge a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.).

A client may cancel Landmark's services at any time. If the client cancels within five days after engaging Landmark, he or she will receive a full refund of any amounts paid in advance. If the client cancels during a quarter, he or she will receive a refund of any unearned fees.

Advice on other matters. Landmark provides financial advice upon client request and/or as the situation requires. There is no additional fee charged for this type of service. Up to 10% of Landmark's time is spent on these matters. In addition, Landmark may provide a review of investment and proxy voting policies for pension and profit sharing plans for compliance purposes and charges a negotiated fee. Currently less than 5% of our time is spent on these matters.

The specific manner in which fees are charged by Landmark is established in a client's written agreement with Landmark. Landmark will generally bill its fees on a quarterly basis. Clients may also elect to be billed directly for fees or to authorize Landmark to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution made during the applicable. Accounts initiated or terminated during a calendar month will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Landmark's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, 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. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Landmark's fee, and Landmark shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that Landmark considers in selecting or recommending broker-dealers and custodians for client transactions and determining the reasonableness of their compensation (e.g., commissions).

Item 6 – Performance-Based Fees and Side-By-Side Management

Landmark does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Landmark provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, endowments, private investment funds, corporations and business entities.

Item 8 – 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. Landmark's primary method of security analysis is based upon Modern Portfolio Theory. Modern Portfolio Theory is a theory on how risk-averse investors can construct portfolios to optimize or maximize expected return based on a given level of market risk, emphasizing that risk is an inherent part of higher reward. Modern Portfolio Theory seeks to construct an optimal portfolio by considering the relationship between risk and return, especially as measured by such industry-recognized measures of risk such as alpha, beta, and R-squared.

Landmark utilizes multiple sources of information and research, including but not limited to proprietary investment research firms, Dimensional Fund Advisors, Fidelity Management & Research (hereafter Fidelity) research services, Morningstar Office, financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategies

Through our process of fact gathering we come to understand each client's current financial situation, federal tax bracket, investment knowledge, risk tolerance, investment objectives, time horizon for the invested assets and desired investment strategy. This information becomes the basis for the strategic asset allocation plan which we believe will best meet the client's stated long term, personal financial goals and objectives. We regularly communicate with our clients and review their situation and circumstances. Clients may contact us with changes at any time.

The investment advice which we provide is based upon long-term investment strategies which incorporate the principles of Modern Portfolio Theory. In developing client portfolios, Landmark primarily uses mutual funds to invest in asset classes rather than purchasing individual securities. Primarily, Landmark recommends clients invest in a well diversified set of mutual funds, incorporating large cap, mid cap, and small cap companies. These mutual funds may include both domestic and international securities. Landmark may also use some less traditional mutual funds, including REIT funds, commodity funds, emerging market debt funds, high yield and multi-sector bond funds, and alternative strategy mutual funds. Client portfolios may also include exchange-traded funds (ETFs).

The utilization of several different asset classes as part of an investor's portfolio is emphasized, as this has been shown to usually effect a reduction in portfolio volatility over long periods of time. We diversify our client's assets among various asset classes and then among individual investments, following the guidelines agreed to by the client.

Our investment approach is firmly rooted in the belief that markets are somewhat efficient and that investors' returns are determined principally by asset allocation decisions. We utilize no-load, low-cost, passive/active, tax-efficient, well diversified stock and bond mutual funds, Exchange traded funds, CD's and other similar investments to develop globally diversified portfolios.

Client portfolios from time to time may also include some individual stock securities or individual bonds.

We generally recommend stock investment strategies that focus on long-term appreciation for tax efficiency. However, we recommend fixed income investment strategies based on the interest rate climate.

Risk of Loss

All investments have certain risks that are borne by the investor. Our investment approach is to educate clients of these risks and select only those risks that they can tolerate in exchange for potential return. 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 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.

- **Small Company Risk:** Securities of small companies are often less liquid than those of large companies and this could make it difficult to sell a small company security at a desired time or price. As a result, small company stocks may fluctuate relatively more in price. In general, smaller capitalization companies are also more vulnerable than larger companies to adverse business or economic developments and they may have more limited resources.
- **Mutual Funds and Exchange Traded Funds (ETFs):** An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss. Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV. Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.
- Investing in market and private securities involves the risk of loss. Clients should be prepared to bear such loss.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Landmark or the integrity of Landmark's management. Landmark has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Mark P. Collard, joined Bank of America / Quick & Reilly as a Vice President in 2002. Prior to that he worked two years for Harold C. Brown & Co., Inc as a portfolio manager and/or HSBC in London, United Kingdom and Buffalo, New York for where he spent two years in Private Banking. In 2005, Mr. Collard founded and operated the investment advisory firm, Odyssey Advisors for six years. He is now managing principal in Landmark.

Mr. Collard was born in 1976. He received a MBA from the State University of Buffalo at New York in 2005 and BS degree from Saint Vincent College in 1998, in Business Finance. He holds the following licenses –Series 63, 65.

Mr. Brian K. Laible joined Landmark in September 2011 in connection with the combination of our firm with Advanced Wealth Management. In 2010 Mr. Laible founded Advanced Wealth Management after serving from 2002 to 2010 as a Vice President of Sanderson & Co. another registered investment advisor. From 1994 to 2001 Mr. Laible was an accountant with Ernst & Young. He holds the following licenses – Series 63, 65.

Mr. Laible was born in 1976. He received a MBA from the University of Notre Dame in 2002 and a BA in Accounting and Finance from Canisius College in 1999. Mr. Laible is a Certified Public Accountant, a Certified Financial Planner and a Certified Investment Management Analyst.

Certified Public Accountant (CPA) CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require continuing professional education (CPE) each year. Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Certified Financial Planner™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.
- Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
 - Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
 - Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CIMA - Certified Investment Management Analyst The CIMA certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, pass an online Certification Examination, and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements. CIMA designees are required to adhere to IMCA’s Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA).

The CIMA certification has earned ANSI® (American National Standards Institute) accreditation under the personnel certification program. The American National Standards Institute, or ANSI, is a private non-profit organization that facilitates standardization and conformity assessment activities in the United States. CIMA is the first financial services credential to meet this international standard for personnel certification

Mr. Collard and Mr. Laible will determine the investment advice given to the applicant's clients. Mr. Collard and Mr. Laible may from time to time act as a principal of private investment partnerships which may be offered to clients of Landmark. Landmark does not exercise investment discretion with respect to investments of client assets in such private investment partnerships and does not charge management fees with respect to such investments although they may receive distributions with respect to such private investment partnerships. Mr. Collard and Mr. Laible devote less than 5% of their professional time to such private investment partnerships.

Gene Kershner, CPA is a minority shareholder and will not be actively involved in the management of client assets or firm activities. He was born in 1963. Mr. Kershner is a Partner with the accounting firm CTBK, located in Amherst, New York. He was formerly a Partner with Chiampou, Travis & Co. which merged with Cantara & Dansa in 1997.

Gene holds a BS in Accounting from Elmira College.

The Investment Advisory firm will physically be occupying space within CTBK (as a lessee) and will share administrative resources (ie. secretarial support). The partners of CTBK are passive minority members of Landmark and will refer business as appropriate - this relationship will be disclosed to any and all potential clients of Landmark. As stated before, the partners of CTBK are not actively involved in the management of Landmark.

Item 11 – Code of Ethics

Landmark has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Landmark must acknowledge the terms of the Code of Ethics annually, or as amended.

Landmark anticipates that, in appropriate circumstances, consistent with clients'

investment objectives, it will cause accounts over which Landmark has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Landmark, its affiliates and/or clients, directly or indirectly, have a position of interest. Landmark's employees and persons associated with Landmark are required to follow Landmark's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Landmark and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Landmark's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Landmark will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Landmark's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Landmark and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Landmark's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Landmark will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Landmark's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting info@landmarkfirm.com on our company's website.

It is Landmark's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Landmark will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and

another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. Landmark is not registered as a broker-dealer nor has an affiliated broker-dealer, this disclosure is not applicable to Landmark.

Item 12 – Brokerage Practices

Landmark recommends that its supervisory clients open an account with Fidelity, which is a discount brokerage firm. Landmark recommends this firm because of the quality of their administrative services, because of their reduced brokerage commissions, and because no load mutual funds can be purchased through them. Landmark receives no direct or indirect compensation from Fidelity with regard to its supervisory accounts.

Landmark may receive certain benefits from its relationship with Fidelity, principally in the form of account management software and investment research, but currently does not. These benefits are sometimes referred to as soft dollar benefits. Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

Item 13 – Review of Accounts

Periodic Reviews

Periodic Portfolio Reviews are undertaken by advisors of Landmark to ascertain if the values in any asset class have strayed beyond their target minimums or maximums and/or for purposes of meeting a client's cash flow needs.

Even if one or more asset classes fall outside their target minimums or maximums, we may determine not to rebalance the asset class for various reasons, such as avoidance of short-term capital gains, deferring long-term capital gains realization, minimization of transaction costs, or their view on whether the asset class is undervalued or overvalued relative to historic norms. Clients are only contacted in the event that rebalancing actions are recommended.

Additional Portfolio Reviews are undertaken upon request by the client, such as when special cash needs arise or when additional cash or securities are added to the investment

portfolio. We will respond to such requests within a reasonable period of time. We may also recommend sales and purchases to effect tax loss harvesting in addition to rebalancing actions

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, etc.

Regular Reports

Investment clients meet with their Landmark advisor on at least an annual basis and receive a follow up letter reviewing the meeting topics.

Quarterly Reports

Many investment clients receive written quarterly updates from Landmark. The written updates include account performance reports, quarterly billing summary and investment newsletter. Monthly Statements are additionally sent to the client directly from the independent, account custodian (specifically, Fidelity). These statements reflect the assets in the custodian's custody, together with confirmations of each transaction executed in the account(s) if desired by the client. Clients may elect to receive these statements by e-mail rather than U.S. mail.

Clients may also directly access account information at the custodian with which the accounts are held online (specifically, Fidelity) each and every business day via their secure website at www.fidelity.com

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. Those clients to whom Landmark provides investment advisory services will also receive a report from Landmark that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance on a quarterly basis. Clients should compare the account statements they receive from their custodian with those they receive from Landmark.

Those clients to whom Landmark provides financial planning and/or consulting services will receive reports from Landmark summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by Landmark.

Item 14 – Client Referrals and Other Compensation

Incoming Referrals

Landmark referrals typically come from current clients, estate planning attorneys, accountants, employees and other similar sources, including clients of Chiampou, Travis, Besaw & Kershner. Although the firm does not currently compensate referring parties for these referrals, subject to compliance with applicable law Landmark may in the future do so. Landmark does not believe that any referral fees will increase the amount of any management fees paid to the firm.

Referrals Out

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

Other Compensation

Landmark receives no other form of compensation from or for client referrals. Notwithstanding the foregoing, Landmark may make payments to or receive income from Sanderson Wealth Management with respect to a limited number of clients that were serviced by Mr. Laible when he was associated with that firm.

Item 15 – Custody

Clients should receive at least monthly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Landmark urges you to carefully review such statements and compare such official custodial records to the account statements that 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

Landmark usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Landmark observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Landmark's authority to trade securities may also be limited by

certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Landmark in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Landmark does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Landmark may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Landmark's financial condition. Landmark has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Information Security

We maintain an information security program to reduce the risk that our client's personal and confidential information may be breached.

Privacy Notice

Landmark 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. We use this information to help you meet your personal financial goals.

At client request only, will we disclose limited information to attorneys, accountants and mortgage lenders with whom you have established a relationship.

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

We do not provide your personal information to mailing list vendors or solicitors. 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. We are required by law to deliver this Privacy Notice to you annually in writing.