

**Item 1. Cover Page for Part 2A of Form
ADV: Firm Brochure**

Dated February 10, 2012

**INVESTMENT INSIGHT WEALTH MANAGEMENT, LLC
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NORTH MASSAPEQUA, NY 11758**

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This brochure provides information about the qualifications and business practices of Investment Insight Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact by telephone at 516-249-0060 or email at bob@MyInvestmentInsight.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 Investment Insight Wealth Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Please note that the use of the term “registered investment adviser” and description of Investment Insight Wealth Management, LLC and/or our associates as “registered” does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firms’ associates which advise you for more information on the qualifications of our firm and its employees.

Item 2. Material Changes

Investment Insight Wealth Management, LLC is required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure. We must state clearly that we are discussing only material changes since the last annual update of our Brochure, and we must provide the date of the last annual update of our Brochure.

Please note that we do not have to provide this information to a client or prospective client who has not received a previous version of our brochure.

11/14/2011: Our firm represents that it is a registered investment adviser under the Investment Advisers Act of 1940, and qualifies as an Investment Manager under Section 3(38) and/or Section 3(21) of ERISA, and that it is a fiduciary to the plan within the meaning of ERISA. As a 3(38) Investment Manager we are authorized by the client to exercise our best judgment in investing, selling and reinvesting the cash and securities in the Account in its discretion. If the client elects us to become their 3(21) Investment Manager we will not have discretionary authority over the ERISA account. In no case shall we hold any assets of the plan but rather they are held by an independent custodian selected by client.

Our firm also offers 401(k) account review for client with assets in their account over \$1 million. 401(k) account reviews are charged a flat fee of \$299. If the client is not satisfied with the plan or find substantial savings, fees will be returned.

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Item 4. Advisory Business

We specialize in the following types of services: asset management and financial planning and consultations. Our assets under management are \$28,102,290 as of 12/31/11.

We are dedicated to providing individuals and other types of clients with a wide array of investment advisory services. Our firm is a limited liability company formed in the State of New York. Our firm has been in business as an investment adviser since 2004 and is owned 100% by Robert Sullivan.

Description of the types of advisory services we offer:

Asset Management:

We emphasize continuous and regular account supervision and individualized investment advice to clients. As part of our asset management service, we generally create a portfolio, consisting of:

- individual stocks or bonds;
- exchange traded funds (“ETFs”);
- options, mutual funds;
- other public securities or investments.

The client’s individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client’s circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client’s individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Management of 401(k) assets will also be provided for plan participants who wish to have those asset reviewed, rebalanced and managed on an ongoing basis.

We offer clients customized portfolios to suit a variety of investment objectives:

- **Growth Portfolio** – Primary focus is on making your capital grow, income is a not a concern, comfortable with market fluctuation;
- **Equity Income Portfolio** – Primary focus on making your capital grow; income is a secondary focus; stock portfolio; comfortable with market fluctuation;
- **Balanced Portfolio** – Primary focus on making your capital grow; income is a secondary focus; stock and bond portfolio; comfortable with market fluctuation;
- **Income Portfolio** – Primary focus is for providing immediate income; growth is not a concern, comfortable with a lower level of market fluctuation;
- **Tax Free Bond Portfolio** – Primary focus is for providing income that is free from income tax; growth is not a concern, comfortable with a lower level of market fluctuation.

Financial Consulting Services:

We provide a variety of financial planning and consultation services to individuals, families, business and other clients regarding the management of their financial resources based upon an analysis of client's current situation, goals, and objectives. Generally, such services are financial consulting for clients based on the client's financial goals and objectives.

This planning or consulting may encompass one or more of the following areas:

Individual Investors:

- Portfolio Analysis
- Development of a Financial Plan
- Retirement Planning
- Investment Tax Strategies
- Estate Tax Planning
- Tax Free Municipal Bond Investing

Business:

- Portfolio Analysis
- Retirement Plan Fiduciary Services
- Retirement Plan Design and Implementation
- Financial Planning for Key Executives

Our written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. It should also be noted that we refer clients to an accountant, attorney or other specialist, as necessary for non-advisory related services. Financial consulting services are typically completed within 6 months of the client signing a contract with us, assuming that all the information and documents we request from the client are provided to us promptly. Implementation of the recommendations will be at the discretion of the client. Financial Consulting Clients who wish to have Investment Insight Wealth Management, LLC provide ongoing asset management a separate advisory agreement will need to be executed and in certain circumstances their financial consulting fee will be waived.

3(38) and 3(21) ERISA Investment Management:

Our firm represents that it is a registered investment adviser under the Investment Advisers Act of 1940, and qualifies as an Investment Manager under Section 3(38) and/or Section 3(21) of ERISA, and that it is a fiduciary to the plan within the meaning of ERISA. As a 3(38) Investment Manager we are authorized by the client to exercise our best judgment in investing, selling and reinvesting the cash and securities in the Account in its discretion. If the client elects us to become their 3(21) Investment Manager we will not have discretionary authority over the ERISA account. In no case shall we hold any assets of the plan but rather they are held by an independent custodian selected by client.

As Investment Manager we accept the fiduciary responsibility (and therefore fiduciary legal liability) to:

1. Select the investment options for the plan;
2. Construct model portfolios which may be offered to plan participants;
3. Construct qualified default investment alternatives which may be used as default investments for participants who fail to make an affirmative investment election:
 - a. Construct models in accordance with the Department of Labor (DOL) guidelines for such models;
 - b. Determine the criteria the investment manager will use in constructing qualified default investment alternatives models and assigning the models to plan participants:
 - i. Age demographics for models based solely on participant age without taking into account any other demographics¹ (e.g. target-date models).
 - ii. Employee demographics for models based on a target level of risk appropriate for participants of the plan as a whole (e.g. balanced model or conservative model). Demographics may include:
 1. Age;
 2. Income;
 3. Risk tolerance;
 4. Other investments;
4. Monitor the investment options and models and make any changes the investment manager deems necessary;
5. Provide the plan sponsor with documentation (overview), regarding the investment manager's management of the models and its selection of investment options offered to participants so that the plan sponsor may fulfill its fiduciary responsibility (therefore its legal liability) regarding the plan sponsor's engagement of the manager and continued engagement of the manager.

As 3(38) Investment Manager we shall have discretion over the establishment of the plan's investment policy, the prudent selection, monitoring, removal and replacement of the plan's investment options. As 3(21) Investment Manager we will not have discretion. These responsibilities will be performed on a non-discretionary basis. Adviser, however, agrees that it will be serving as a fiduciary to the plan under ERISA in performing these functions as both 3(38) and 3(21) Investment Managers.

We shall provide investment education to plan participants regarding the selection of Model Portfolios, and will survey each plan participant to assess the individual's risk profile that will assist in the selection of an appropriate portfolio.

Our firm also offers 401(k) account review for client with assets in their account over \$1 million.

401(k) Plan Review:

We offer business clients who have 401(k) accounts with assets over \$1 million a plan assessment summarized by a written review. This will include...

- A review of the 401(k) plan design

- A review and analysis of the plan investment options
- Coordination of an employee communications program
 - a) Educational Seminars
 - b) Enrollment meetings
 - c) One-on-one meetings
- Support of 401k plan committee
 - a) Plan reviews every 3 to 5 years
 - b) Investment review process every 2 years
- Plan reporting process
 - a) Delivery of annual reports
 - b) Summary of committee activities, employee communications, plan participation, investment recommendations

Participation in wrap fee programs:

We do not offer wrap fee programs.

Amount of client assets we manage:

We manage¹ \$28,102,290 on a discretionary basis and \$0 on a non-discretionary basis as of 12/31/11.

Item 5. Fees and Compensation

Asset Management:

Assets Under Management	Annual Percentage of assets charge*
\$0 to \$1,000,000	1.25%
\$1,000,000 to \$3,000,000	1.00%
\$3,000,000 and above	0.75%

*Our firm's fees are billed on a pro-rata annualized basis quarterly in arrears based on the value of your account on the time-weighted daily average of the quarter.

¹ Please note that our method for computing the amount of "client assets we manage" can be different from the method for computing "assets under management" required for Item 5.F in Part 1A of Form ADV. However, we have chosen to follow the method outlined for Item 5.F in Part 1A of Form ADV. If we decide to use a different method at a later date to compute "client assets we manage," we must keep documentation describing the method we use and inform you of the change. The amount of assets we manage may be disclosed by rounding to the nearest \$100,000. Our "as of" date must not be more than three months before the date we last updated our Brochure in response to Item 4.E of Form ADV Part 2A.

Financial Consulting Services:

We charge on an hourly or flat fee basis for financial planning and consulting services. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of our engagement with you. Our hourly fee is \$250. Flat fees generally range from \$500 to \$3,000.

We require a retainer of fifty percent (50%) of the estimated total financial planning or consulting fee with the remainder of the fee directly billed to you and due to us within thirty (30) days of your financial plan being delivered or consultation rendered to you. In all cases, we will not require a retainer exceeding \$500 when services cannot be rendered within six (6) months. Upon client termination we will charge the client an hourly fee of \$250 per hour for work actually performed and a refund will be given if prepaid fees are more than fees for services provided. In the event that prepaid fees do not cover the actual fees owed, we will invoice the client which will be due immediately.

*Our firm's fees are billed on a pro-rata annualized basis quarterly in arrears based on the value of your account on the time-weighted daily average of the quarter.

3(38) and 3(21) ERISA Investment Management:

Assets Under Management	Annual Advisory Fee*
\$0 - \$500,000	0.75%
\$500,000 - \$1,000,000	0.40%
\$1,000,000 - \$2,000,000	0.35%
\$2,000,000 - \$10,000,000	0.30%
\$10,000,000 - \$20,000,000	0.25%
Above \$20,000,000	0.20%

*Our firm's fees are billed on a pro-rata annualized basis quarterly in arrears based on the value of your account on the time-weighted daily average of the quarter.

401(k) Account Review:

401(k) account reviews are charged a flat fee of \$299. If the client is not satisfied with the plan or find substantial savings, fees will be returned.

Other types of fees or expenses clients may pay in connection with our advisory services, such as custodian fees or mutual fund expenses:

Our clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees and will be disclosed by the firm trades are executed through. Also, clients will pay the following separately incurred expenses, of which we do not receive any part: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund

management fees and other fund expenses). Please refer to Item 12 Brokerage Practices under section Directed Brokerage.

Deduction of advisory fees and Refunds:

We charge our advisory fees quarterly in arrears. If you wish to terminate our services, you need to contact us in writing and state that you wish to cancel this Agreement. Upon receipt of your letter of termination, we will proceed to close out your account and charge you a pro-rata advisory fee(s) for services rendered up to the point of termination. Refunds for prepaid fees for financial planning will be given based on the actual time spent providing advisory services up to the receipt of client's termination letter and calculated at an hourly rate of \$250.

Commissionable securities sales:

We do not sell securities for a commission. In order to sell securities for a commission, we would need to have our associated persons registered with a broker-dealer. We have chosen not to do so.

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

We do not charge performance fees to our clients.

Item 7. Types of Clients and Account Requirements

We have the following types of clients:

- Individuals, IRA, Custodians for minors, 529 Plans;
- Trusts, Estates or Charitable Organizations;
- Pension and Profit Sharing Plans;
- Corporations, limited liability companies and/or other business types

Our requirements for opening and maintaining accounts or otherwise engaging us:

- We generally require a minimum account balance of combined assets under management of \$50,000 for our asset management service.
- We generally charge a minimum fee of \$500 for written financial plans. This minimum fee shall be negotiable.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

Our firm will utilize a fundamental analysis which examines earnings, dividends, new products, research and the like. Risk involved in this analysis are generally isolated to market volatility, changes in firm structure and the market place of the firm.

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

Our firm will make long term purchases (securities held at least a year), short term purchases (securities sold within a year), trading (securities sold within 30 days), and short sales. Generally there is more risk involved with shorter trading. We also use short sales to implement our strategies in which we would hope to make a profit from prices going down. The related risks occur when the price of the assets rises. There may also be costs for shorting such as a fee for borrowing the assets and payment of any dividends on the borrowed assets. Similarly margin transactions, option writing, including covered options, uncovered options or spreading strategies may be used to implement our strategies.

Additional information regarding our investment strategies:

We generally invest client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve the highest return on our client's cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to comprehensive portfolio management, asset management service and portfolio monitoring, as applicable.

Item 9. Disciplinary Information

We have determined that there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Item 10. Other Financial Industry Activities and Affiliations

Mr. Sullivan is also licensed to sell insurance products with may be offered to our advisory clients. Normal commission in connect with the sale of these products may be earned. None of our advisory clients are obligated to buy insurance products from our firm.

**Item 11. Code of Ethics, Participation or Interest in Client
Transactions and Personal Trading**

Brief description of our Code of Ethics adopted pursuant to SEC rule 204A-1 and offer to provide a copy of our Code of Ethics to any client or prospective client upon request.

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts². In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates. Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Related persons of our firm may buy or sell securities for themselves at or about the same time they buy, sell or recommend the same securities to client accounts. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Further, our related persons will refrain from buying or selling the same securities within 48 hours of buying, selling or recommending to our clients. If related persons' accounts are included in a block trade, our related persons will always trade personal accounts last.

² For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

Item 12. Brokerage Practices

Description of the factors that we consider in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

Our firm has an arrangement with Fidelity Brokerage Services LLC (“Fidelity”) and TD Ameritrade Institutional is a division of TD Ameritrade, Inc. (“TD Ameritrade”) member FINRA/SIPC/NFA (collectively “Broker/ Dealers”) which provides our firm. These platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support our firm in conducting business and in serving the best interests of our clients but that may benefit our firm.

As part of the arrangement described in Item 12A1, Broker/ Dealers also make certain research and brokerage services available at no additional cost to our firm. These services include certain research and brokerage services, including research services obtained by Broker/ Dealers directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided by Broker/ Dealers to our firm may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by Broker/ Dealers to our firm in the performance of our investment decision-making responsibilities. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving the services discussed in 12A(1)a of this Firm Brochure for no additional cost, we may have an incentive to continue to use or expand the use of Broker/ Dealers’ services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with Broker/Dealers and we have determined that the relationship is in the best interest of our firm’s clients and satisfies our client obligations, including our duty to seek best execution. Broker/Dealers charge brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Broker/ Dealers enable us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Broker/ Dealers’ commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by Broker/ Dealers may be higher or lower than those charged by other custodians and broker-dealers.

Our non-wrap fee program clients may pay a commission to Broker/ Dealers that is higher than another qualified broker dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer’s services, including the value of research

provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

Although the investment research products and services that may be obtained by our firm will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

Special Considerations for ERISA Clients

A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

Aggregation of orders (bunching), which may result in reduced transaction costs.

We may aggregate the purchase or sale of securities for various client accounts in quantities sufficient to obtain reduced transaction costs (known as bunching or block trading). There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives.

Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved.

In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13. Review of Accounts or Financial Plans

Frequency of review of account or financial plans:

We review accounts on at least a quarterly basis for our clients subscribing to the following services: Asset Management. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. The members of the investment committee will conduct these reviews.

Financial planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. We do not provide ongoing services to financial planning clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc.

Factors that trigger more frequent reviews:

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

Content and frequency of regular reports provided to clients regarding their accounts.

We do not provide written reports to clients, unless asked to do so. Verbal reports to clients take place on at least an annual basis when we meet with clients who subscribe to the following services: Asset Management

As mentioned above, financial planning clients do not receive written or verbal updated reports regarding their financial plans unless they separately contract with us for a post-financial plan meeting or update to their initial written financial plan.

Item 14. Client Referrals and Other Compensation

Additional Compensation and Arrangements:

Apart from the arrangements disclose in Item 12 of this Brochure, we do not have any additional arrangements to disclose.

Direct or Indirect compensation of persons other than our firm's supervised persons for client referrals:

We may pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm. Such referral fee represents a share of our investment advisory fee charged to our clients. This arrangement will not result in higher costs to you. In this regard, we maintain Solicitors Agreements applicable state and federal laws. All clients referred by Solicitors to our firm will be given full written disclosure describing the terms and fee arrangements between our firm and Solicitor(s). In cases where state law requires licensure of solicitors, we ensure that no solicitation fees are paid unless the solicitor is registered as an investment adviser representative of our firm. If we are paying solicitation fees to another registered investment adviser, the licensure of individuals is the other firm's responsibility.

Item 15. Custody

We do not have custody over our client's accounts. In order to ensure that we are not deemed to have custody, we have adopted the following safeguarding procedures:

- (1) Our clients must provide us with written authorization permitting direct payment to us of our advisory fees from their account(s) maintained by a custodian who is independent of our firm;
- (2) Our client account custodian will send statements, at least quarterly, showing all disbursements from client accounts, including advisory fees. These statements should be examined closely in order to verify the calculation of the advisory fee deducted from client accounts.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.

Item 16. Investment Discretion

We exercise discretionary authority to manage securities accounts on behalf of some of our clients. These clients need to sign a discretionary investment advisory agreement with our firm for the management of their account.

Item 17. Voting Client Securities

SEC Rule 206(4)-6 requires investment advisers who have voting authority with respect to securities held in their clients' accounts to monitor corporate actions and vote proxies in their clients' interests. We are required by the SEC to adopt written policies and procedures, make those policies and procedures available to clients, and retain certain records with respect to proxy votes cast.

Our firm votes client proxies when authorized to do so in writing by a client. We understand our duty to vote client proxies and to do so in the best interest of our clients. Furthermore, we understand that any material conflicts between our interests and those of our clients with regard to proxy voting must be resolved before proxies are voted. We subscribe to a proxy monitor and voting agent service offered by broadridge investor communication solutions, inc. ("broadridge"), which includes access to proxy analyses with research and vote recommendations from glass, lewis & co. ("glass lewis"). Our firm will generally vote in accordance with the recommendations of glass lewis, but may vote in a different fashion on particular votes if we determine that such actions are in the best interest of our clients. Where applicable, we will consider any specific voting guidelines designated in writing by a client. Clients may request a copy of our written policies and procedures regarding proxy voting and/or information on how particular proxies were voted by contacting our chief compliance officer, Robert Sullivan by phone at 516-249-0060 or email at bob@myinvestmentinsight.com.

1. Policy for voting proxies.

We vote the proxies online as they come into our office. They are generally voted in accordance with board recommendations and in a timely manner by our office. We look to ensure that our firm is compliant with the New Exchange Act Rule 14a-11. In accordance with the aforementioned rule, our firm provides shareholders with the opportunity to nominate directors at a shareholder meeting under the applicable state or foreign law. Clients also have the ability to have their nominees included in the company proxy materials sent to all of our shareholders. Furthermore, the clients as shareholders also have the ability to use the shareholder proposal process to establish procedures for the inclusion of shareholder director nominations in company proxy materials.

2. Proxies voting guidelines.

Where voting authority exists, proxies are voted by our firm in the best interests of plan beneficiaries:

- for directors and for management on routine matters.
- for a limit on or reduction of the number of directors, and for an increase in the number of directors on a case by case basis.
- against the creation of a tiered board.
- for the elimination of cumulative voting.
- for independence of auditors
- for deferred compensation.
- for profit sharing plans.
- for stock option plans unless the plan could result in material dilution to shares outstanding or is excessive.
- for stock repurchases.
- for an increase in authorized shares unless the authorization effectively results in a blind investment pool for shareholders.
- for reductions in the par value of stock.
- for company name changes.
- for routine appointments of auditors.

We abstain on motions to limit directors' liability. Material issues not addressed above (e.g., mergers, poison pills, social investing and miscellaneous shareholder proposals) are dealt with on a case-by-case basis.

a) Description of whether (and, if so, how) our clients can direct our vote in a particular solicitation.

Our firm will defer to client voting policies as directed. Eligible shares are monitored against ballots received from custodians, and detailed records of all issues and votes are maintained and reported to clients as requested.

b) How we address conflicts of interest between our firm and clients are addressed with respect to voting their securities.

We recognize that under certain circumstances we may have a conflict of interest between us and our clients. Such circumstances may include, but are not limited to, situations where our firm or one or more of our affiliates, including officers, directors and employees, has or is seeking a client relationship with the issuer of the security that is the subject of the proxy vote. We shall periodically inform our employees that they are under an obligation to be aware of the potential for conflicts of interest on the part of our firm with respect to voting proxies on behalf of funds, both as a result of our employee's personal relationships and due to circumstances that may arise during the conduct of our business, and to bring conflicts of interest of which they become aware to the attention of the proxy manager. We shall not vote proxies relating to such issuers on behalf of client accounts until we have determined that the conflict of interest is not material or a method of resolving such conflict of interest has been agreed upon by our management team. A conflict of interest will be considered material to the extent that it is determined that such conflict has the potential to influence our decision-making in voting a proxy. Materiality determinations will be based upon an assessment of the particular facts and circumstances. If we determine that a conflict of interest is not material, we may vote proxies notwithstanding the existence of a conflict. If the conflict of interest is determined to be material, the conflict shall be disclosed to our management team and we shall follow the instructions of the management team. We shall keep a record of all materiality decisions and report them to the management team on an annual basis.

c) Description of how clients may obtain information from us about how we voted their securities.

Our chief compliance officer will maintain files relating to our proxy voting procedures. Records will be maintained and preserved for five years from the end of the fiscal year during which the last entry was made on a record, with records for the last two years kept on our premises. Records of the following will be included in the files:

- copies of these proxy voting policies and procedures, and any amendments thereto.
- a copy of each proxy statement that we receive, provided however that our firm may rely on obtaining a copy of proxy statements from the sec's edgar system for those proxy statements that are available.
- a record of each vote that we cast.
- a copy of any document we created that was material to making a decision how to vote proxies, or that memorializes that decision.
- a copy of each written client request for information on how we voted such client's proxies, and a copy of any written response to any client request for information on how we voted their proxies.

d) How clients may obtain a copy of our proxy voting policies and procedures upon request.

Clients may request a copy of our written policies and procedures regarding proxy voting and/or information on how particular proxies were voted by contacting our chief

compliance officer, Robert Sullivan by phone at 516-249-0060 or email at bob@myinvestmentinsight.com.

We do not rely on third-party proxy voting services to advise us in connection with voting client securities. We do not pay for proxy voting services with soft dollars. Also, we do not charge an additional fee to vote proxies.

Item 18. Financial Information

Additional financial informational about our firm:

- We do not require nor do we solicit prepayment of more than \$500 in fees per client, six months or more in advance, therefore we have not included a balance sheet for our most recent fiscal year.
- We have not been subject of a bankruptcy petition at any time during the past ten years.
- There is no additional financial condition to disclose that may impair our ability to meet contractual commitments to our clients.