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Disclosure Brochure

February 28, 2012

This Brochure provides information about the qualifications and business practices of Flint Financial Investments Management Corporation ("FFIMC"). If you have any questions about the contents of this Brochure, please contact us at 239.936.2777. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

FFIMC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an investment adviser are intended to provide you with information to assist you in determining whether to hire or retain that investment adviser.

Additional information about FFIMC also is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Since our last annual update to this Brochure which was published on March 7, 2011, we have made the following material changes:

1. As of the update published September 1, 2011, FFIMC offers the Advisory Account on a discretionary basis as well as a non-discretionary basis.
2. As of the update published October 6, 2011, FFIMC no longer sends separate invoices for its fees. The Portfolio Performance Summary shows the management fees paid to us.

In the past we have offered or delivered information about our qualifications and business practices to clients on an annual basis. Going forward, we will ensure that you receive a summary of any material changes to our brochure by April 29th of each year. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes will include the date

of our last annual update of our brochure.

A copy of our brochure may be requested by contacting Sherri Hynden, Chief Operating Officer, at 239.936.2777.

We will provide you with a current brochure at any time without charge.

Additional information about us and about persons affiliated with us who are registered as our investment adviser representatives (“your adviser”) is also available via the SEC’s website, at www.adviserinfo.sec.gov.

Information regarding your adviser can also be found in the supplement to this brochure on the page shown in the table of contents to the right of this column.



Eric J. Hynden, President
Sherri L. Hynden, Vice Pres.

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Advisory Business

FFIMC, which is located in Fort Myers, Florida, is a corporation organized under the laws of the State of Florida. Eric and Sherri Hynden founded FFIMC in 2000 and are its principal owners. FFIMC is registered as an investment advisory firm with the SEC.

Investment Advisory Services

We provide you with a variety of investment advisory accounts to select from to match your specific investment objectives and risk tolerances. Certain of those accounts are managed by us on a discretionary basis (meaning that you authorize us to make specific investment decisions on your behalf).

The scope of our discretionary authority is limited to selecting specific investments for your account and deciding how to allocate your assets among those investments. We will decide if and when to buy, hold, or sell those investments. Once you have granted us discretionary authority, it is effective until you change it or revoke it in writing.

We exercise investment discretion through 14 different *Discretionary Management Accounts*. We will determine which account(s) to recommend to you based on your overall risk tolerance, investment objectives, and investment time horizon. Each of the accounts will generally be invested in stocks or bonds. Based on market conditions,

we may also purchase no-load mutual funds and/or Exchange Traded Funds (“ETFs”) for the account. We may also temporarily maintain a portion of your account in cash. In some instances, we may take steps to manage the effect of taxes on taxable accounts.

Our selection of individual stocks and bonds to purchase and/or sell for your account will be based upon our own research as well as research from third-parties.

The *Discretionary Management Accounts* we offer include the following:

DMA Growth Strategy

The *DMA Growth Strategy* may be appropriate for you if you seek to achieve long-term growth. This account may invest in approximately 20-30 growth-oriented stocks, although mutual funds and/or ETFs may be purchased to add diversification. The actual allocations between stocks and mutual funds/ETFs may vary depending on market conditions. Generally, we expect that the value of the *DMA Growth Strategy* will be subject to higher than average market volatility.

DMA Growth Balanced Strategy

The *DMA Growth Balanced Strategy* may be appropriate for you if you seek to achieve growth and moderate income. This account will generally consist of approximately 40-60% stocks and 40-60% bonds. The stock portion of the

portfolio may invest in approximately 20-30 growth-oriented stocks and the bond portion may invest in individual bonds, bond mutual funds or ETFs. Bonds may be taxable or tax-free or a combination depending on individual client circumstances. Mutual funds or ETFs may be purchased to help provide diversification including but not limited to international, small cap, emerging markets, alternatives, high yield., etc. The actual allocations of investments (including the use of mutual funds and ETFs) may vary depending on market conditions. Generally, we expect that the value of the *DMA Growth Balanced Strategy* will be subject to average market volatility.

DMA Dividend Strategy

The *DMA Dividend Strategy* may be appropriate for you if you seek to achieve equity income with growth. This account may invest in approximately 15-25 growth-oriented stocks with a higher than market average dividend yield. The actual allocations of investments (including the use of mutual funds and ETFs) may vary depending on market conditions. Generally, we expect that the value of the *DMA Dividend Strategy* will be subject to average market volatility.

DMA Dividend Balanced Strategy

The *DMA Dividend Balanced Strategy* may be appropriate for you if you seek to achieve income with a moderate potential for growth. This account may invest in approximately 40-60% stocks

and 40-60% bonds. The stock portion of the account may invest in approximately 15-25 growth-oriented stocks with a higher than market average dividend yield. The bond portion of the account will generally invest in individual bonds, bond mutual funds or ETFs. Bonds may be taxable or tax-free or a combination depending on individual client circumstances. Mutual funds or ETFs may be purchased to help provide diversification including but not limited to international, small cap, emerging markets, alternatives, high yield., etc. The actual allocation of investments (including the use of mutual funds and ETFs) may be adjusted to meet your income needs and may vary depending on market conditions. Generally, we expect that the *DMA Dividend Balanced Strategy* will be subject to lower than average market volatility.

DMA Growth Dividend Strategy

The *DMA Growth Dividend Strategy* may be appropriate for you if you seek to achieve long-term growth and equity income. This account may be a combination of the *DMA Growth* and the *DMA Dividend Strategies*. This account may invest in up to 40-60 stocks which may be a combination of growth stocks and dividend stocks, with the dividend stocks having a higher than market average dividend yield. The actual allocations of investments (including the use of mutual funds and ETFs) may vary depending on market conditions. Generally, we expect that the value of the

DMA Growth Dividend Strategy will be subject to average market volatility

DMA Growth Dividend Balanced Strategy

The *DMA Growth Dividend Balanced Strategy* may be appropriate for you if you seek to achieve equity income and potential for moderate growth. This account may be a combination of 40-60% stocks and 40-60% bonds. The stock portion of the account may invest in up to 40-60 growth and dividend stocks. The bond portion of the account may consist of individual bonds, bond mutual funds or ETFs. Bonds may be taxable or tax-free or a combination depending on individual client circumstances. Mutual funds or ETFs may be purchased to help provide diversification including but not limited to international, small cap, emerging markets, alternatives, high yield, etc. The actual allocations of investments (including the use of mutual funds and ETFs) may be adjusted to meet your income needs and may vary depending on market conditions. Generally, we expect that the *DMA Growth Dividend Balanced Strategy* will be subject to average to low market volatility.

DMA Dividend Income Strategy

The *DMA Dividend Income Strategy* may be appropriate for you if you seek to achieve high current dividend income. This account may invest in 20 to 25 income-oriented stocks. The actual allocations of investments (including the use of mutual funds and ETFs) may vary

depending on market conditions. Generally, we expect that the *DMA Dividend Income Strategy* will be subject to lower than average market volatility.

DMA Dividend Income Balanced Strategy

The *DMA Dividend Income Balanced* may be appropriate for you if you seek to achieve high current dividend income and moderate bond income. This account may be a combination of approximately 40-60% stock and 40-60% bonds. The stock portion of the account may invest in approximately 20 to 25 higher dividend paying stocks. The bond portion of the account may invest in individual bonds, bond mutual funds or ETFs. Bonds may be taxable or tax-free or a combination depending on individual client circumstances. Mutual funds or ETFs may be purchased to help provide diversification including but not limited to international, small cap, emerging markets, alternatives, high yield, etc. The actual allocations of investments (including the use of mutual funds and ETFs) may be adjusted to meet your income needs and may vary depending on market conditions. Generally, we expect that the *DMA Dividend Income Balanced Strategy* will be subject to lower market volatility.

DMA Bond Strategy

The *DMA Bond Strategy* may be appropriate for you if you seek to achieve income with lower than average bond market volatility. This portfolio may consist of individual bonds, bond

mutual funds or ETFs. Bonds may be taxable or tax-free or a combination depending on individual client circumstances. Mutual funds or ETFs may be purchased to help provide diversification including but not limited to international, small cap, emerging markets, alternatives, high yield, etc. Actual allocations of investments (including the use of mutual funds and ETFs) may vary depending on your income needs and market conditions.

DMA Specialized Opportunities Strategy

The *DMA Special Opportunities Strategy* may be appropriate for you if you seek to achieve capital appreciation. This account may consist of approximately 20-30 stocks, mutual funds and/or ETFs focused on special situations that may develop in sectors such as energy, precious metals, alternative technologies and infrastructure. The actual allocations of investments may vary depending on market conditions. Generally, we expect that the *DMA Special Opportunities Strategy* will be subject to higher than average market volatility.

Discretionary Fund Account ("DFA") Growth Strategy

The *DFA Growth Strategy* may be appropriate for you if you seek to achieve maximum capital appreciation. This account, which will be actively managed, may consist of equity no-load mutual funds and ETFs. The actual allocations of investments may vary depending on market conditions.

Generally, we expect that the *DFA Growth Strategy* will be subject to higher than average market volatility.

DFA Balanced Strategy

The *DFA Balanced Strategy* may be appropriate for you if you seek to achieve growth and moderate income. This account, which will be actively managed, may consist of equity, fixed income and balanced no-load mutual funds and ETFs. The actual allocations of investments may vary depending on market conditions. We expect that the *DFA Balanced Strategy* will be subject to lower than average market volatility.

DFA Flexible Income Strategy

The *DFA Flexible Income Strategy* may be appropriate for you if you seek to achieve income. This account, which will be actively managed, may consist of fixed income and balanced no-load mutual funds and ETFs. The actual allocations of investments may vary depending on market conditions. We expect that the *DFA Flexible Income Strategy* will be subject to lower than average market volatility.

NDAA or DAA Advisory Account

The *Advisory Account* may be appropriate for you if you seek to manage risk and returns through diversification. The specific investments purchased for your account will be determined by your specific risk tolerances and investment objectives and may include no-load

mutual funds (or load mutual funds purchased at net asset value), ETFs, stocks, bonds, variable annuities, and alternative investments.

In the *Non-Discretionary Advisory Account* (“NDA”), individual investments will only be purchased or sold based on your specific prior approval. In the *Discretionary Advisory Account* (“DA”), we are granted full investment discretion on your behalf in a manner consistent with your investment objectives and risk tolerances. This allows us to purchase, sell, exchange, convert, exercise, transfer or trade in any securities that may be appropriate for your account, without first obtaining your prior approval.

Third-Party Investment Managers

We also use third-party investment managers to help us invest your assets. The securities transactions in these accounts are decided upon and executed by the third-party investment manager. Typically, they exercise discretion over the purchase and sale of the securities in these accounts. We do not obtain discretionary authority over the assets in the accounts; however, clients may grant us the discretionary authority to hire and fire such third-party investment managers.

Investment Considerations

We consider your financial situation, risk tolerance, investment horizon, liquidity needs, tax considerations, investment objectives, and any other issues unique to

you in recommending particular investment accounts to you. You are free to choose the investment account that you believe best meets your investment objectives and risk tolerance, regardless of the account we recommend. You may place reasonable restrictions on the management of your account and may change investment strategies as you deem appropriate.

Assets under Management

As of December 21, 2011, we managed approximately \$80 million in client assets where we made all of the investment decisions. Approximately \$12 million in client assets were managed where our clients made investment decisions based upon our recommendations.

Financial Planning Services

We offer various financial planning services, which generally include the following:

Initial Consultation: We meet with you to explore the benefits and financial costs of preparing a financial plan. This preliminary meeting is offered to you at no cost or obligation.

Data Gathering Meeting: Once you retain us to provide financial planning services, we request information from you regarding your current financial situation, goals, and objectives. Pertinent financial documents are obtained from you (including, for example, a current financial statement, investment records,

legal documents such as trusts, and investment and bank statements) and we ask that you complete a “Risk Tolerance Questionnaire” to assist us in determining your appropriate overall level of risk.

Analysis and Plan Design: We analyze the information provided and design a plan based on your goals, financial objectives, risk tolerance, time horizon and overall family situation.

Presentation of Plan: We present the plan to you and review each segment of the plan. We then ask that you take time to discuss and consider the plan before making a decision as to whether or not to implement it.

Implementation of the Plan: We will implement the plan once you have authorized us to do so.

Monitoring the Plan and Ongoing Services: We will schedule regular, periodic meetings with you to review the plan and to discuss any changes that may have occurred with respect to your financial situation, investment objectives, and risk tolerances. Because successful implementation of the plan is dependent on the information you provide to us, it is important that you notify us of any material changes in your financial condition, investment objectives, or risk tolerance.

Depending on your specific needs, we may offer additional services, including risk tolerance analysis, tax-managed

investing, cash flow analysis, and retirement planning and income protection strategies.

Legal and Accounting Services: We do not provide any legal or accounting services but will cooperate with your attorney and/or accountant in evaluating factors that should be considered in developing and implementing a plan for you. Any fees for legal or accounting advice will be billed to you directly by your attorney or accountant and will not be shared with us.

Surviving Spouse Financial Planning Program

We also provide financial planning specifically directed to singles, widows, widowers, and divorcees, which includes assisting in re-titling assets in trusts (if necessary), setting up systematic cash flow, collecting insurance and annuity payouts, centralizing and simplifying asset management, and other related services. These services may be appropriate for couples in retirement or couples with a terminally ill spouse.

Fees and Compensation

Investment Advisory Services Fees

Our services are provided for a fee paid quarterly in advance, based on an annual percentage of the assets being managed. No fee adjustments will be made for additional deposits, partial withdrawals or account appreciation or depreciation during the quarter.

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians (hereinafter referred to as “custodian/broker-dealer”). Your custodian/broker-dealer determines the values of the assets in your account.

We may exclude the value of certain assets from our fee calculation based on various factors such as the liquidity of the investment and whether we received a commission from your purchase of that investment.

We require that you authorize us in writing to have the custodian/broker-dealer pay our investment advisory fees directly to us by charging your account. One-fourth of the annual fee is charged each calendar quarter, as follows:

Quarterly Fee Calculation

$$\text{Assets under Management} \times \text{Annual Fee} \div 4 = \text{Quarterly Fee}$$

The fees we charge for *DMA Accounts* are as follows:

<u>Assets Under Management</u>	<u>Advisory Fee</u>
\$100,000 to \$250,000	1.50%
\$250,001 to \$500,000	1.25%
\$500,001 to \$1,000,000	1.00%
\$1,000,001 to 2,500,000	0.75%

The fees we charge for the *DMA Bond Account* are as follows:

<u>Assets Under Management</u>	<u>Advisory Fee</u>
\$100,000 to \$250,000	0.75%
\$250,001 to \$500,000	0.65%
\$500,001 to \$1,000,000	0.50%
\$1,000,001 to 2,500,000	0.40%
\$2,500,001 and up	0.25%

The fees we charge for the *DFA Account* are as follows:

<u>Assets Under Management</u>	<u>Advisory Fee</u>
\$100,000 to \$250,000	1.50%
\$250,001 to \$500,000	1.25%
\$500,001 to \$1,000,000	1.00%
\$1,000,001 to 2,500,000	0.75%
\$2,500,001 and up	0.50%

The fees we charge for the *NDAA and DAA Accounts* are as follows:

<u>Assets Under Management</u>	<u>Advisory Fee</u>
\$100,000 to \$250,000	1.30%
\$250,001 to \$500,000	1.10%
\$500,001 to \$1,000,000	0.90%
\$1,000,001 to 2,500,000	0.70%
\$2,500,001 and up	0.50%

The fees you pay for *Third-Party Investment Managers* varies dependent upon the manager selected for your account. You will receive disclosure specific to each investment manager disclosing more specific information about the manager and the fees associated with their management.

We will send you statements that include your Portfolio Performance Summary, Allocation and Holdings. The Summary shows the management fees being paid to Flint Financial. Your custodian/broker-dealer will also provide you with statements that show the amounts paid directly to us. You should compare the statement we send you to the statements sent by your custodian/broker-dealer. Your custodian/broker-dealer does not verify the accuracy of fee calculations. The actual fee calculations made by Flint Financial are available upon request.

Financial Planning Fees

As previously noted, there is no cost or obligation for our initial consultation. Once engaged, we will charge an hourly rate from \$50 to \$250 per hour depending on the level of service and complexity of your financial plan. The amount of time required to prepare and maintain a plan varies depending on your particular financial situation. Estate, retirement and investment planning services are typically more involved and may be charged a fee ranging between \$500 and \$5,000 depending upon the overall complexity.

Surviving Spouses Financial Planning Program

The fees we charge for the *Surviving Spouses Financial Planning Program* are as follows:

<u>Assets Under Management</u>	<u>Advisory Fee</u>
Up to \$1,000,000	\$500
\$1,000,001 to \$2,500,000	\$750
\$2,500,001 to \$5,000,000	\$1,000
\$5,000,001 and up	\$1,500

In the past, our fees were calculated on a fixed, rather than tiered, schedule. Some accounts continue to have their fees calculated in that manner. New accounts with no previous relationship with us tend to be negotiated on a tiered basis. Certain client accounts may also be subject to a previous fee schedule and will continue to be charged in accordance with that fee schedule, as described in their specific advisory agreement. All fees are negotiable and may be discounted solely at our discretion.

In addition to our fees, you may be required to pay other charges such as:

- custodial fees,
- brokerage commissions,
- transaction fees,
- internal fees and expenses charged by mutual funds or “ETFs”, and
- other fees and taxes on brokerage accounts and securities transactions.

Mutual fund companies, ETFs, and variable annuity issuers charge internal fees and expenses for their products. These fees and expenses are in addition to any advisory fees that we charge. Complete details of these internal fees and expenses are explained in the prospectus for each investment. You are strongly encouraged to read these documents before making or authorizing any investments. We are available to answer any questions you have about fees and expenses.

If you purchase mutual funds through the custodian/broker-dealer, you may pay a transaction fee that would not be charged if those transactions were made directly through the mutual fund companies. Additionally, mutual funds held in accounts at custodian/broker-dealers may pay internal fees that are different from mutual funds held at the mutual fund company.

While you may purchase shares of mutual funds directly from a mutual fund company without a transaction fee, those investments will not be part of our advisory relationship with you. This means that those investments will not be included in our investment strategies, investment performance monitoring, or portfolio reallocations.

Please be sure to read the section entitled “Brokerage Practices,” which follows later in this brochure.

You must pay our investment advisory fees in advance of receiving our services. Should you terminate the advisory

agreement we have entered into within five (5) business days from the date the agreement is executed, you will receive a full refund of any fees paid. Should either one of us terminate the advisory agreement before the end of a billing period, any unearned fees that were deducted from your account will be returned to you by us. The amount refunded to you is calculated by dividing the most recent advisory fee you paid by the total number of calendar days in the quarter. This daily fee is then multiplied by the number of calendar days in the quarter that our agreement was in effect. This amount, which equals the amount we earned for the partial quarter, is subtracted from the total fee you paid in advance to determine your refund.

Your adviser may likely be a registered representative of FSC Securities Corp (“FSC”), an unaffiliated securities broker-dealer, member FINRA and SIPC. If you choose to implement your financial plan through FSC, commissions may be earned by your adviser in addition to any fees paid for advisory services. Your adviser may also be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Your adviser may be licensed with various insurance companies. Commissions may be earned by your adviser if insurance products are purchased through these insurance companies.

We may also refer you to various asset management firms. Referral fees may be paid to us if you establish a relationship with the asset manager.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Performance-Based Fees

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments. We do not charge performance-based fees on any of our client accounts.

Types of Clients

We provide advisory services primarily to individuals and high net worth individuals, including their trusts, estates and retirement accounts. We also provide services to charitable organizations, corporations or business entities including their pension and profit

sharing plans. As a condition for starting and maintaining an advisory relationship, we generally require a minimum account size of \$100,000.

We, at our sole discretion, may accept you as a client if you have an account smaller than \$100,000 based upon a variety of factors including:

- your anticipated future earning capacity,
- anticipated future additional assets,
- your account composition,
- accounts we manage for clients related to you, and
- pre-existing relationships we might have with you.

We may consider the accounts of your family members to determine if your account meets our minimum size requirement.

Methods of Analysis, Investment Strategies and Risk of Loss

We select specific investments for your account through the use of fundamental and technical analysis.

Fundamental analysis is a method of evaluating a company that has issued securities by attempting to measure the value of its underlying assets. This entails studying overall economic and industry conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets, and liabilities are all important in determining the value of a company. The value is then compared to

the current price of the company's securities to determine whether to purchase, sell or hold those securities.

Technical analysis is a method of evaluating securities by analyzing statistics associated with market activity, such as past prices and trading volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future performance.

Our investment strategies may include long-term and short-term purchases and sales, and trading (selling securities within 30 days of purchase). You may place reasonable restrictions on the strategies to be employed in your account and the types of investments to be held in your account.

Although we manage your portfolio in a manner consistent with your specific risk tolerances, there can be no guarantee that our efforts will be successful. General economic conditions, current interest rates, the performance of a particular industry or a particular company, and any number of other factors can affect investment performance. You should be prepared to bear the risk of loss. All investments bear the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings.

You should also be aware that transactions in the account (including account reallocations and rebalancing) may trigger a taxable event for you (unless your account is a qualified retirement account).

Disciplinary Information

We have not been the subject of any legal or disciplinary events that would be material to your evaluation of our business or the integrity of our management.

Other Financial Industry Activities and Affiliations

In addition to his/her position with FFIMC, your adviser is also registered representative and investment advisory representative with FSC Securities Corporation ("FSC"), a registered broker/dealer (member FINRA/SIPC). You are under no obligation to purchase or sell securities or advisory services through your adviser in conjunction with his/her association with FSC. If you do so, however, they may earn compensation in the form of commissions or investment advisory fees.

Your adviser is also a licensed insurance agent. You are similarly under no obligation to purchase insurance products through your adviser. If you do so, however, your adviser may receive commissions in addition to any fees you pay to us.

We offer technology services to clients under the name of “FFIMC Technology Services, a division of FFIMC.” Our Management Information Services Associate provides these services to clients who experience computer hardware and software-related problems. Eric and Sherri Hynden are the owners of Flint Financial Group, Inc., which is a holding company under which FFIMC and FFIMC Technology Services operate. They are not engaged in any business activities beyond those described above.

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

We have adopted a Code of Ethics (“Code”) to address the securities-related conduct of our advisory representatives and employees. The Code includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of your adviser (and our other investment advisory representatives and employees) be conducted in a manner consistent with the Code and avoid any actual or potential conflict of interest, or any abuse of your advisers position of trust and responsibility;
- that your adviser may not take inappropriate advantage of his/her position;

- that information concerning the identity of your securities holdings and financial circumstances are confidential; and
- that independence in the investment decision-making process is paramount.

We will provide a copy of the Code to you or any prospective client upon request.

We do not buy or sell securities for our own account that we also recommend to you. Your adviser is, however, permitted to buy or sell the same securities for his/her personal and family accounts that are bought or sold for your account. This may raise potential conflicts of interest when your adviser purchases or sells a security that is also owned by you, or is being considered for purchase or sale for your account.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- require your adviser to act in your best interest,
- prohibit your adviser from favoring one client over another, and
- provide for the review of transactions by your adviser to discover and correct any same-day trades that result in your adviser (or any of our other advisers or employees) receiving a better price than you.

Your adviser must follow our procedures when purchasing or selling the same

securities purchased or sold for your account.

Brokerage Practices

We generally recommend that the broker-dealer/custodian for your account be TD Ameritrade Inc., ("TD Ameritrade"). If we recommend that your account be managed through our relationship with FSC, we recommend that your broker-dealer/custodian be Pershing, LLC ("Pershing"). TD Ameritrade and/or Pershing will assist us in servicing your account. We are independently owned and operated and not affiliated with TD Ameritrade or Pershing. Our use of TD Ameritrade and/or Pershing is, however, a beneficial business arrangement for us and for TD Ameritrade and/or Pershing. Information regarding the benefits of this relationship is described below.

In recommending TD Ameritrade or Pershing as your custodian/broker-dealer, we consider, at a minimum, their:

- existing relationship with us,
- financial strength,
- reputation,
- reporting capabilities,
- execution capabilities,
- pricing, and
- types and quality of research.

The determining factor in the selection of TD Ameritrade or Pershing to execute transactions for your account is not the lowest possible transaction cost, but whether TD Ameritrade or Pershing can

provide what is in our view the best qualitative execution for transactions in your account.

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

TD Ameritrade and Pershing provide us with access to its institutional trading and custody services, which includes:

- securities brokerage,
- custody,
- research, and
- access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

We are not required to effect a minimum volume of transactions or maintain a minimum dollar amount of client assets to receive these services.

There is no direct link between Advisor's participation in the program and the benefits through its participation in the

program that are typically not available to TD Ameritrade retail investors.

TD Ameritrade and Pershing do not charge separately for holding and servicing your account, but may be compensated by you through other transaction-related fees associated with the securities transactions they execute for your account.

TD Ameritrade and Pershing also make available to us other products and services that benefit us but may not benefit you directly. Some of these products and services assist us in managing and administering our client accounts, such as software and other technology that:

- provide access to account data such as:
 - duplicate trade confirmations,
 - bundled duplicate account statements, and
 - access to an electronic communication network for client order entry and account information;
- facilitate trade execution, including:
 - access to a trading desk serving investment advisers exclusively, and
 - access to bunched trading which provides us with the ability to combine securities transactions for the accounts of multiple clients and then allocate the appropriate number of shares to each individual account;
- provide research, pricing information

and other market data;

- facilitate payment of our fees from client accounts;
- assist with back-office functions, record keeping and client reporting; and
- provide us with compliance-related publications.

TD Ameritrade and Pershing also make available to us other services intended to help us manage and further develop our business. These services may include:

- consulting,
- publications and conferences on practice management,
- information technology,
- business succession,
- regulatory compliance, and
- marketing.

TD Ameritrade and/or Pershing may discount or waive the fees it would otherwise charge for some or all of these services. They may also arrange for certain of these services to be provided to us by independent third-parties. In that regard, TD Ameritrade and/or Pershing may pay all or a part of the fees of the third-party providing these services to us. Thus, we receive economic benefits as a result of our relationships with TD Ameritrade and Pershing because we do not have to produce or purchase the products and services listed above.

The benefits received by us or our personnel through participation in the program do not depend on the amount

of brokerage transactions directed to TD Ameritrade.

Because the amount of compensation and the products or services we receive may vary depending on the custodian/broker-dealer we recommend to be used by our clients, we may have a conflict of interest in making that recommendation. Our recommendation of TD Ameritrade and/or Pershing may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

Commissions and other fees for transactions executed through TD Ameritrade and/or Pershing may be higher than commissions and other fees available if you use another custodian/broker-dealer to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to you and our other clients by TD Ameritrade and/or Pershing outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements. Many of the services described above may be used to benefit all or a substantial number of our clients, including clients whose accounts are not maintained through TD Ameritrade or Pershing. We do not attempt to allocate these benefits to specific clients.

Review of Accounts

We regularly monitor your account, as well as general conditions in the stock and bond markets, and recommend changes and/or alternate investments or opportunities when we believe it is appropriate to do so. We strongly encourage you to notify us of any material changes in your overall financial condition or your investment objectives or risk tolerance as these could have a material effect on the recommendations we make to you.

Eric and Sherri Hynden are responsible for conducting all client account reviews. We strive to meet with you on a regular, periodic basis to discuss your account. You may contract for quarterly, semi-annual, or annual meetings or may meet with your adviser at a pre-arranged time to discuss any questions or concerns you might have.

While you will generally meet with your adviser, we may arrange for one or more other advisers who have particular subject matter expertise to also meet with you.

You will receive statements from TD Ameritrade or Pershing at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values.

If your account is managed under a *DMA, DFA or NDAA/DAA Strategy*, we will provide quarterly performance reports of your account reflecting

individual positions, gains or losses, and the rate of return for particular time periods. You will receive a statement of positions at least quarterly reflecting current values as determined by TD Ameritrade or Pershing.

You will receive confirmations for all of the transactions we effect for your account. Confirmations will generally be mailed to you but you have the option of having confirmations sent to you electronically (via e-mail).

Client Referrals and Other Compensation

We may enter into written compensation agreements with unaffiliated investment advisers, investment adviser representatives, and professionals such as CPAs and attorneys who refer clients to us. We may pay these persons a percentage (generally 10% to 30%) of the fee paid to us by the clients they refer to us. These payments will solely be a portion of the fee that we charge and will not result in an increase in the amount of the fee paid by the client.

Any solicitation or referral arrangements will comply with applicable laws and regulations that govern the nature of the service provided. Should you be referred to us by a third-party to whom we will pay a referral fee, we will provide you with a written disclosure that describes the specific fees to be paid. We will require that you provide us with written acknowledgment of this arrangement before we share fees with the third-party

that referred you to us.

As described in “Advisory Services” we sometimes use third-party investment managers to help manage your assets. A conflict of interest exists because our compensation differs depending on the manager we select. We strive to put your best interests first, and will explain all costs involved with your accounts. You may place reasonable restrictions on the management of your account.

As previously noted in the “Brokerage Practices” section, we receive certain economic benefits (“Additional Services”) as a result of our participation in the institutional programs of TD Ameritrade and Pershing. We also receive certain additional economic benefits (“Additional Services”) from TD Ameritrade that may or may not be offered to any other independent investment advisors participating in the program. Specifically, the “Additional Services” include Performance Technologies, Inc. Portfolio Center. TD Ameritrade pays a third party a portion of the fee required for us to access portfolio management software. TD Ameritrade provides the Additional Services to us in its sole discretion and at its own expense. We do not pay any fees to TD Ameritrade for the software. We have entered into a separate agreement (“Additional Services Addendum”) with TD Ameritrade to govern the terms of this arrangement.

Our arrangement with TD Ameritrade to pay a portion of the software fee raises

potential conflicts of interest. In providing the Additional Services to us, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, our client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with us, in its sole discretion, provided certain conditions are met.

Consequently, in order to continue our arrangement with TD Ameritrade, we may have an incentive to recommend to you that your assets be held in custody with TD Ameritrade and to place transactions for you with TD Ameritrade. This arrangement does not diminish our duty to act in your best interests, including seeking best execution of trades for your accounts.

Your adviser may be eligible to receive incentive-based awards such as trips to FSC's annual Educational Conference. Your adviser may also be invited to attend, at no cost, educational conferences and seminars conducted by investment product sponsors.

Custody

Other than to withdraw our advisory fees which, may only be done with your prior written authorization, we do not have custody of your assets. You will receive statements from TD Ameritrade or Pershing regarding your account on at least a quarterly basis. We urge you to

carefully review these statements. You should verify that the transactions in your account are consistent with your investment goals and the objectives for your account. We also encourage you to contact your adviser should you have any questions or concerns regarding your account.

Investment Discretion

As previously noted, we offer certain advisory services on a discretionary basis, meaning that we do not need advance approval from you to determine the type and amount of securities to be bought and sold for your account. We may only exercise discretion if you have provided that authority to us in writing. This authorization is typically included in the investment advisory agreement you enter into with us.

The discretionary authority you grant to us does not provide us the ability to choose the broker-dealer through which transactions will be executed or to negotiate brokerage commissions. Additionally, our discretionary authority does not provide us the ability to withdraw funds from your account (other than to withdraw our advisory fees which, may only be done with your prior written authorization).

We will exercise discretion in a manner consistent with the stated investment objectives for your account.

We also offer our advisory services on a non-discretionary basis, meaning that we

need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts.

Voting Client Securities

We do not take any action or give any advice to you with respect to voting of proxies solicited by or with respect to the issuers of securities in which your account may be invested. In addition, we do not take any action or give any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits.

We will, however, forward to you any information received by us regarding proxies and class action legal matters involving any securities held in your account. We may also provide you with clerical assistance in completing and submitting related documents.

Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you. We have not been the subject of a bankruptcy proceeding.

Eric J. Hynden



Flint Financial Investments Management Corporation

12629 New Brittany Boulevard
Fort Myers, FL 33907

239.936.2777

Brochure Supplement

February 28, 2012

This brochure supplement provides information about Eric J. Hynden that supplements the brochure for Flint Financial Investments Management Corporation. You should have received a copy of that brochure. Please contact Sherri Hynden, Chief Operating Officer, if you did not receive our brochure or if you have any questions about the contents of this supplement.

Additional information about Eric Hynden is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Eric J. Hynden

Year of birth: 1959

Formal education:

- DePauw University---BA in Mathematics, Minor in Economics (1981)

Business background:

- Flint Financial Investments Management Corporation - Founder, President; (09/2000 – Present)
- FSC Securities Corporation – Registered Representative & Investment Adviser; (10/1986 – Present)
- Flint Financial Group, Inc. – President and CEO; (1986 – Present)

Professional designations:

Chartered Financial Consultant® (ChFC)- The ChFC program provides financial planners and others in the financial services industry with in-depth knowledge of the skills needed to perform comprehensive financial planning for their clients.

Candidates must pass an examination addressing a number of financial planning-related areas including (among others):

- Financial Planning: Process and Environment
- Fundamentals of Insurance Planning
- Income Taxation
- Planning for Retirement Needs
- Investments
- Fundamentals of Estate Planning
- Financial Planning Applications
- The Financial System in the Economy
- Estate Planning Applications
- Financial Decisions for Retirement

Candidates must meet certain experience requirements prior to applying to begin the process for receiving the ChFC designation. In most instances, the process for qualifying for the ChFC designation takes 15-24 months.

ChFC designees must complete 30 hours of continuing education every two years and must meet continuing ethical standards.

Securities licenses :

Mr. Hynden holds Series 7, Series 24, Series 63, and Series 66 securities licenses. These licenses are required to conduct certain levels of securities

business, but do not imply any level of skill or training.

Disciplinary Information

Mr. Hynden has not been the subject of any legal or disciplinary event.

Other Business Activities

In addition to his association with FFIMC, Mr. Hynden is:

- an investment advisory representative of FSC Securities Corporation (a registered investment adviser);
- a registered representative of FSC Securities Corporation (a registered broker/dealer); and
- a licensed insurance agent.

You are not required to do business with Mr. Hynden in any of these capacities.

As a registered representative of a broker-dealer, Mr. Hynden may receive commissions or other compensation from the sale of mutual funds or other products to you. (For example, Mr. Hynden may receive “12b-1 fees,” which are fees paid by mutual fund companies for the on-going marketing of their investment products). This additional compensation may present a conflict of interest because it creates an incentive to recommend certain investments over others that may not offer similar compensation.

Mr. Hynden may also earn commissions from insurance products you purchase from him. You are under no obligation to purchase such products from him.

Supervision

Mr. Hynden is supervised by Sherri Hynden, Chief Operating Officer. Ms. Hynden can be reached at 239.936.2777.

We supervise Mr. Hynden by requiring that he adhere to our processes and procedures as described in our *Code of Ethics*. We will monitor the advice that Mr. Hynden gives to you by performing the following reviews:

- A review of relevant account opening documentation when your relationship is established
- A daily review of account transactions
- Review custodial information on a quarterly basis to assess account activity
- Perform annual oversight to ensure that Mr. Hynden is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.

Sherri L. Hynden



Flint Financial Investments Management Corporation

12629 New Brittany Boulevard
Fort Myers, FL 33907

239.936.2777

Brochure Supplement

February 28, 2012

This brochure supplement provides information about Sherri L. Hynden that supplements the brochure of Flint Financial Investments Management Corporation. You should have received a copy of that brochure. Please contact Eric Hynden, President, if you did not receive our brochure or if you have any questions about the contents of this supplement.

Additional information about Sherri Hynden is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Sherri L. Hynden

Year of birth: 1959

Formal education:

- DePauw University--- BA in Economics, Cum Laude (1981)

Business background:

- Flint Financial Investments Management Corporation - Founder, Vice President; (09/2000 – Present)
- FSC Securities Corporation – Registered Representative & Investment Adviser; (10/1986 – Present)
- Flint Financial Group, Inc. – Vice President and COO; (1986 – Present)

Professional designations:

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- Planning for Retirement Needs
- Investments
- Fundamentals of Estate Planning
- Financial Planning Applications
- The Financial System in the Economy
- Estate Planning Applications
- Financial Decisions for Retirement

Candidates must meet certain experience requirements prior to applying to begin the process for receiving the ChFC designation. In most instances, the process for qualifying for the ChFC designation takes 15-24 months.

ChFC designees must complete 30 hours of continuing education every two years and must meet continuing ethical standards.

Securities licenses :

Ms. Hynden holds Series 7, Series 24, Series 63, and Series 66 securities licenses. These licenses are required to conduct certain levels of securities business, but do not imply any level of skill or training.

Disciplinary Information

Ms. Hynden has not been the subject of any legal or disciplinary event.

Other Business Activities

In addition to her association with FFIMC, Ms. Hynden is also:

- an investment advisory representative of FSC Securities Corporation (a registered investment adviser);
- a registered representative of FSC Securities Corporation (a registered broker/dealer); and
- a licensed insurance agent.

You are not required to do business with Ms. Hynden in any of these capacities.

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