



**7359 EAST KEMPER ROAD \* SUITE A \* CINCINNATI, OH 45249**  
**(513) 469-1822 \* INFO@FWAG.COM**

**WWW.FWAG.COM**

## **Firm Brochure**

(Part 2A and 2B of Form ADV)

Part 2A: This brochure provides information about the qualifications and business practices of Family Wealth Advisory Group, LLC. If you have any questions about the contents of this brochure, please contact us at (513) 469-8100 or by email at: [info@fwag.com](mailto:info@fwag.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 Family Wealth Advisory Group is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

March 1, 2012

Family Wealth Advisory Group, LLC

## Material Changes

---

### Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure. The last update to this brochure was March 1, 2011.

---

### Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization. As such, we have revised our ADV Part 2 form to reflect this new rule.

We have changed the fee schedule for some of our services to reflect updates to our contracts for new clients.

---

### Full Brochure Availability

The full brochure includes Part 2A which is part of this document, Part 2A Appendix (wrap fee program brochure which does not apply to our firm) and Part 2B Brochure Supplement which is attached at the end of this document. Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (513) 469-8100 or by email at: [info@fwag.com](mailto:info@fwag.com).

# Table of Contents

<b>Material Changes.....</b>	<b>i</b>
Annual Update .....	i
Material Changes since the Last Update .....	i
Full Brochure Availability.....	i
<b>Advisory Business .....</b>	<b>1</b>
Firm Description.....	1
Types of Advisory Services.....	1
Tailored Relationships .....	2
Types of Agreements.....	2
Financial Planning Agreement .....	2
Wealth Management Agreement .....	2
Investment Supervisory Agreement.....	3
Tax Preparation Agreement.....	3
Hourly Planning Engagements .....	4
Asset Management.....	4
Termination of Agreement .....	4
<b>Fees and Compensation .....</b>	<b>4</b>
Description .....	4
Fee Billing .....	5
Other Fees.....	5
Expense Ratios.....	5
Past Due Accounts and Termination of Agreement .....	5
<b>Performance-Based Fees .....</b>	<b>5</b>
Sharing of Capital Gains .....	5
<b>Types of Clients.....</b>	<b>6</b>
Description .....	6
Account Minimums.....	6
<b>Methods of Analysis, Investment Strategies and Risk of Loss.....</b>	<b>6</b>
Methods of Analysis.....	6
Investment Strategies .....	6
Risk of Loss .....	7

<b>Disciplinary Information .....</b>	<b>8</b>
Legal and Disciplinary.....	8
<b>Other Financial Industry Activities and Affiliations .....</b>	<b>8</b>
Financial Industry Activities.....	8
Affiliations .....	8
<b>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>8</b>
Code of Ethics .....	8
Participation or Interest in Client Transactions.....	9
Personal Trading.....	9
<b>Brokerage Practices.....</b>	<b>9</b>
Selecting Brokerage Firms.....	9
Best Execution.....	10
Soft Dollars .....	10
Order Aggregation .....	10
<b>Review of Accounts .....</b>	<b>10</b>
Periodic Reviews .....	10
Review Triggers.....	10
Regular Reports.....	11
<b>Client Referrals and Other Compensation .....</b>	<b>11</b>
Incoming Referrals.....	11
Referrals Out .....	11
Other Compensation.....	11
<b>Custody.....</b>	<b>12</b>
Account Statements.....	12
Performance Reports.....	12
Net Worth Statements.....	12
<b>Investment Discretion.....</b>	<b>12</b>
Discretionary Authority for Trading.....	12
Limited Power of Attorney .....	12
<b>Voting Client Securities .....</b>	<b>13</b>
Proxy Votes .....	13
<b>Financial Information .....</b>	<b>13</b>
Financial Condition .....	13

<b>Business Continuity Plan .....</b>	<b>13</b>
General .....	13
Disasters .....	13
Alternate Offices .....	13
Loss of Key Personnel .....	13
<b>Information Security Program.....</b>	<b>14</b>
Information Security .....	14
Privacy Notice .....	14
<b>Brochure Supplement (Part 2B of Form ADV) .....</b>	<b>1</b>
Education and Business Standards .....	1
Professional Certifications .....	1
Owner: Robert J Grossheim, CFP®, CLU® .....	3
Employee: Susan A. Rushworth .....	4
Independent Contractor: James J. Hoskins, CFP® .....	4
Independent Contractor: Herbert S. Huesman, CLU®, ChFC® .....	5

# Advisory Business

---

## **Firm Description**

The Family Wealth Advisory Group, LLC, (hereinafter FWAG) was formed in March 2002 and is 100% owned by Robert J Grossheim.

FWAG provides personalized wealth management, financial planning and investment management services, where appropriate, to individuals, high net worth individuals, trusts and estates. Advice is provided through consultation with the client and may include: determination of financial objectives, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

FWAG is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted by the firm. No finder's fees are accepted.

Investment advice is provided, with or without the client making the final decision on investment selection depending on the extent to which discretion has been authorized. FWAG does not act as a custodian of client assets. The client always maintains asset control. FWAG places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client, often in the form of a financial plan or simply a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

---

## **Types of Advisory Services**

FWAG provides wealth management services, financial planning only services and investment supervisory services. On more than an occasional basis, FWAG furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of 12/31/11, FWAG managed approximately \$105,733,923 in assets for approximately 144 clients. Approximately \$39,739,841 is managed on a discretionary basis, and \$65,994,082 is managed on a non-discretionary basis.

---

**Tailored Relationships**

The goals and objectives for each client are documented in our client files. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

---

**Types of Agreements**

The following agreements define the typical client relationships.

---

**Financial Planning Agreement**

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

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

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

The fee for a financial plan is predicated upon the facts known at the start of the engagement. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

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

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to 12 months.

---

**Wealth Management Agreement**

Most clients choose to have FWAG manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their minor children. Realistic and

measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for a Wealth Management Agreement (WMA) is provided to the client in writing prior to the start of the relationship. A WMA includes: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning; and tax preparation (based on complexity of the return), as well as the implementation of recommendations within each area.

The annual WMA fee is based on a percentage of the investable assets according to the following schedule:

1.00% on the first \$1,000,000;  
0.75% over \$1,000,000

The minimum annual fee is \$3,000 and is not negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above. This is not a progressive scale. For example, a client with \$1,200,000 would pay \$9,000 per year ( $\$1,200,000 \times .75\%$ ) and **not** \$11,500 per year ( $(\$1,000,000 \times 1.00\%) + (\$200,000 \times .75\%)$ ).

Although the Wealth Management Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Tax preparation work is sometimes offered as an integrated part of the Wealth Management Agreement but may be excluded due to complexity.

---

### **Investment Supervisory Agreement**

An Investment Supervisory Agreement may be executed when financial planning and tax preparation are not provided as part of the relationship. The Investment Supervisory Agreement is enacted via a modification of the Wealth Management Agreement and has no minimum annual fee. The annual fee for an Investment Supervisory Agreement is 1.00% of the assets under supervision and is not negotiable.

---

### **Tax Preparation Agreement**

Tax preparation work is included in the Wealth Management Agreement scope of work, if applicable.



---

### **Hourly Planning Engagements**

FWAG provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$250.

---

### **Asset Management**

Assets are invested primarily in no-load or low-waived mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. FWAG does not receive any compensation, in any form, from fund companies or the brokerage companies.

Investments may also include: equities (stocks), corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through FWAG.

---

### **Termination of Agreement**

A Client may terminate any of the aforementioned agreements at any time by notifying FWAG in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, FWAG will refund any unearned portion of the advance payment.

FWAG may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, FWAG will refund any unearned portion of the advance payment.

## **Fees and Compensation**

---

### **Description**

FWAG bases its fees on a percentage of assets under management, hourly charges or fixed minimum fees.

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

In certain circumstances, fees may be modified. Also, in certain circumstances, services provided by independent legal counsel or accountants may be paid for from advisory fees paid to FWAG.

---

### **Fee Billing**

Investment management fees are billed quarterly, in advance, meaning that we invoice you at the beginning of the three-month billing cycle based on the prior quarter-end account value or beginning investment value. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan for plans in excess of \$2,500.

---

### **Other Fees**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

The firm's compensation is solely from fees paid directly by clients. The firm does not receive commission based on the client's purchase of any financial product, including insurance. No commissions in any form are accepted.

---

### **Expense Ratios**

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

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

---

### **Past Due Accounts and Termination of Agreement**

FWAG reserves the right to stop work on any account that is more than 90 days overdue. In addition, FWAG reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in FWAG's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

## **Performance-Based Fees**

---

### **Sharing of Capital Gains**

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

FWAG does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create

an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## Types of Clients

---

### Description

FWAG generally provides investment advice to individuals, high net worth individuals, trusts and estates.

Client relationships vary in size of account, scope and length of service.

---

### Account Minimums

FWAG does not impose investment minimums on its clients. However, Advisors of FWAG do have the discretion to determine whether potential clients who are at or below the minimum fee scales should become clients of the firm based on the payment of those minimum fees.

## Methods of Analysis, Investment Strategies and Risk of Loss

---

### Methods of Analysis

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

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

---

### Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation utilizing a core and satellite approach. This means that we use passively-managed index and exchange-traded funds as the core investments, and then add actively-managed funds where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or collar strategies).

---

## **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Strategy Risk:** Since we primarily use open ended mutual funds and exchange traded funds, there are risks associated with these types of investments. Both types of investments have internal operating and

## **Disciplinary Information**

---

### **Legal and Disciplinary**

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

## **Other Financial Industry Activities and Affiliations**

---

### **Financial Industry Activities**

FWAG has no other industry activities. The Advisors of FWAG may maintain various industry affiliations. Please see their individual biographies at the end of this document for further clarification.

---

### **Affiliations**

FWAG has no arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

---

### **Code of Ethics**

FWAG has adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. FWAG and its personnel owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. FWAG will provide a copy of the Code of Ethics to any client or prospective client upon request.

---

### **Participation or Interest in Client Transactions**

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

---

### **Personal Trading**

The Chief Compliance Officer of FWAG is Robert J Grossheim. He reviews all employee trades each quarter. His trades are reviewed by Susan Rushworth. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

## **Brokerage Practices**

---

### **Selecting Brokerage Firms**

As FWAG does not have the discretionary authority to determine the broker dealer to be used or the commission rates to be paid, clients must direct FWAG as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that FWAG will not have authority to negotiate commissions among various brokers to obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to other clients by those custodians.

FWAG participates in Fidelity's Institutional Wealth Services Group of services (FIWS). Clients in need of brokerage and custodial services will have Fidelity Investments recommended to them. By utilizing (FIWS), FWAG receives benefits that it would not receive if it did not offer investment advice which are described later in this document.

FWAG will reserve the right to decline acceptance of any client account that directs the use of a broker dealer, if FWAG believes that the broker dealer would adversely affect FWAG's fiduciary duty to the client and/or ability to effectively service the client portfolio.

Fidelity Investments may affect Client's over-the-counter securities transactions on an agency basis. In filling these orders, the clients' broker may have transacted with a market-making broker dealer (market maker) on the other side of the trade. A market maker may mark-up/down the price of a security for which it makes a market, which is a cost that will be incurred by the client in addition to the agency commission assessed by the broker.

---

**Best Execution**

FWAG periodically reviews the execution of trades at each custodian. The review is documented in the FWAG Compliance Folder on the FWAG network system. Trading fees charged by the custodians is also reviewed at that time. FWAG does not receive any portion of the trading fees.

---

**Soft Dollars**

FWAG utilizes the services of Fidelity's Institutional Wealth Services Group. While there is no direct link between the investment advice given to clients and FWAG's participation in the Fidelity program, economic benefits are received by FWAG which would not be received if FWAG did not give investment advice to clients. These benefits include: A service group and an account services manager dedicated to FWAG's accounts, ability to block client trades, electronic download of trades, balances and positions, access to an electronic interface with Fidelity's software, duplicate and batched client statements, confirmations and year-end summaries, and the ability to have advisory fees directly debited from client accounts (in accordance with federal and state requirements). At times, FIWS, other Fidelity departments or other custodians may host educational events where travel and/or housing are provided for advisors and staff of FWAG. In these cases, FWAG has chosen to accept these offers rather than adjusting the overall pricing of its services to clients. Finally, FWAG will host client and/or prospect events from time-to-time where a custodian may agree to financially support that event. In those circumstances, FWAG will notify all clients and attendees of this support in an effort to fully disclose all activities related to FWAG.

---

**Order Aggregation**

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

## **Review of Accounts**

---

**Periodic Reviews**

Account reviews are performed quarterly by Robert J. Grossheim, Owner and Lead Advisor, James J. Hoskins, Lead Advisor, Herbert S. Huesman, Lead Advisor and Susan Rushworth, Director of Client Services and Operations. Account reviews are performed more frequently when market conditions dictate.

Due to the project-based nature of financial planning only clients, FWAG will not provide ongoing reviews of these client accounts.

---

**Review Triggers**

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

---

## **Regular Reports**

Wealth Management Clients: In addition to monthly statements and confirmations of transactions that Wealth Management Services clients receive from their broker dealer, FWAG will provide a report summarizing account performance, balances and holdings on at least an annual basis unless otherwise contracted for at the inception of the relationship.

Financial Planning Clients: Due to the project-based nature of this service, FWAG will not provide the above mentioned additional reports to these clients.

## **Client Referrals and Other Compensation**

---

### **Incoming Referrals**

FWAG has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

---

### **Referrals Out**

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

---

### **Other Compensation**

FWAG has two advisors who receive compensation from activities not associated with FWAG:

**Rob Grossheim:** His volunteer activities led him to become part of the Scuba Santa program at the Newport Aquarium. As such, he is required to be a Seasonal Part-Time employee of the Marketing Department of the Newport Aquarium which pays him a stipend based upon hours serving as Scuba Santa.

**Herb Huesman:** While FWAG is a fee only financial planning and investment advisory firm, Herb is the only advisor actively involved in the sale of insurance related products. Therefore, he will also receive compensation (or commissions) from these companies based upon products recommended and implemented by Herb. FWAG does not participate nor receive any part of these commissions or compensation nor do any other advisors associated with FWAG.



# Custody

---

## Account Statements

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

---

## Performance Reports

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

---

## Net Worth Statements

Clients are frequently provided net worth statements and net worth graphs that are generated from our various client service systems. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

# Investment Discretion

---

## Discretionary Authority for Trading

FWAG accepts discretionary authority to manage securities accounts on behalf of clients. FWAG has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, FWAG consults with the client prior to each trade to obtain concurrence if a blanket trading authorization (discretion) has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. FWAG does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

---

## Limited Power of Attorney

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

## Voting Client Securities

---

### Proxy Votes

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

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

## Financial Information

---

### Financial Condition

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

A balance sheet is not required to be provided because FWAG does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

## Business Continuity Plan

---

### General

FWAG has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

### Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

### Alternate Offices

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

### Loss of Key Personnel

FWAG has not signed a Business Continuation Agreement with another financial advisory firm to support FWAG in the event of Rob Grossheim's serious disability or death, but an outline of steps to be taken and insurance policies in place to assist these steps are on file on-site and off-site.

# Information Security Program

---

## Information Security

FWAG maintains an information security program to reduce the risk that your personal and confidential information may be breached.

---

## Privacy Notice

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

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

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by phone to (513) 469-8100, mail, fax, email to [rgrossheim@fwag.com](mailto:rgrossheim@fwag.com), or in person. With your permission, we share a limited amount of information about you with your selected custodian(s) in order to execute securities transactions on your behalf.

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

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

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

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.



**7359 EAST KEMPER ROAD \* SUITE A \* CINCINNATI, OH 45249**  
**(513) 469-1822 \* INFO@FWAG.COM**

**WWW.FWAG.COM**

## **Brochure Supplement**

(Part 2B of Form ADV)

Part 2B: This brochure supplement provides information about Robert J Grossheim, James J Hoskins, Herbert S Huesman and Susan A Rushworth that supplements the FWAG brochure. You should have received a copy of that brochure. Please contact Rob Grossheim if you did not receive FWAG's brochure or if you have any questions about the contents of this supplement.

Additional information about Rob Grossheim, Jim Hoskins, Herb Huesman and Susan Rushworth is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

March 1, 2012

## Brochure Supplement (Part 2B of Form ADV)

---

### Education and Business Standards

FWAG requires certain educational standards and business experience of those involved in the preparation of financial plans and the giving of financial advice. A college degree and business experience in the financial planning profession will be seen as minimum standards that must be maintained in order to provide financial advice.

---

### Professional Certifications

Owners, Employees and Independent Contractors have earned certifications and credentials that are required to be explained in further detail.

**A.** The **CERTIFIED FINANCIAL PLANNER™**, **CFP®** and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

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

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning

services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

**B. The CLU® and ChFC® marks are the property of The American College and may only be used by individuals who have successfully completed the initial and ongoing certification requirements for these designations. The Chartered Life Underwriter® (CLU®) is the world's most respected designation of insurance expertise, providing in-depth knowledge on the insurance needs of individuals, business owners and professionals. The Chartered Financial Consultant® (ChFC®) program prepares an advisor to meet the advanced financial planning needs of individuals, professionals and small business owners.**

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

- The CLU® requires a student to take courses in Fundamentals of Insurance Planning, Individual Life Insurance, Life Insurance Law, Fundamentals of Estate Planning and Planning for Business Owners and Professionals. They also must choose three courses from the following: Financial Planning: Process and Environment, Individual Health Insurance, Income Taxation, Group Benefits, Planning for Retirement Needs, Investments and Estate Planning Applications.
- The ChFC® requires a student to take courses in Financial Planning: Process and Environment, Fundamentals of Insurance Planning, Income Taxation, Planning for Retirement Needs, Investments, Fundamentals of Estate Planning and Financial Planning Applications. They must also choose two courses from the following: The Financial System in the Economy, Estate Planning Applications, Executive Compensation and Financial Decisions for Retirement.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CLU® and ChFC® marks:

- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence and keep up with developments in the specific field.

**C. FINRA/NASD Examinations:** Since all four advisors associated with FWAG used to be Investment Advisor Representatives and Registered Representatives of Lincoln Financial Advisors, they each were registered through FINRA (the Financial Industry Regulatory Authority). As part of the registration process, securities professionals must pass examinations administered by FINRA to demonstrate competence in the areas in which they will work. These mandatory qualification examinations cover a broad range of subjects on the markets, as well as the securities industry and its regulatory structure, ensuring a minimum level of understanding and expertise. The areas in which candidates are tested include federal securities laws; Securities and Exchange Commission (SEC) and FINRA rules and regulations; securities products; the operation and interrelation of financial markets; economic theory and kinds of risk; corporate financing, accounting, and balance sheet analyses; portfolio theory and analysis; fair sales practices, including solicitation and presentation; types of customer accounts; and tax treatment of various investments.

Prospective principals of securities firms must pass additional examinations that test their knowledge of supervisory rules in the areas of investment banking, trading and market making, retail sales activities, and financial responsibility rules. Financial and operational principals must further demonstrate a thorough knowledge of the requirements regarding recordkeeping, net capital, customer reserves, financial reporting, and credit. The Series 65 and Series 66, Uniform Investment Advisor State Law Exam and Uniform Combined State Law Exam are the only active registrations required for advisors working on a fee only fiduciary basis.

---

**Owner: Robert J Grossheim, CFP<sup>®</sup>, CLU<sup>®</sup>**

**Educational Background:**

- Born: December 5, 1967
- B.S. in Business Administration from Miami University, 1990
- M.B.A. in Finance from Xavier University, 1996
- Certified Financial Planner<sup>™</sup>, 1994
- Chartered Life Underwriter<sup>®</sup>, 2006
- FINRA Series 7 (General Securities Registered Representative), 1990 – inactive
- FINRA Series 63 (Uniform Securities Agent State Law Exam), 1991 – inactive
- FINRA Series 65 (Uniform Investment Advisor State Law Exam), 1994
- FINRA Series 24 (General Securities Principal), 1999 - inactive

**Business Experience:**

- 04/04 – Present: Family Wealth Advisory Group, LLC – Owner & Lead Advisor
- 08/90 – 04/04: Lincoln Financial Advisors – Registered Representative and Investment Advisor Representative
- 02/99 – 06/02: Lincoln Financial Advisors – Regional Director of Financial Planning for the Greater Cincinnati Regional Planning Office

**Disciplinary Information:** None

**Other Business or Volunteer Activities:**

- Board Member for The Children's Home of Cincinnati
- Board Member and Scuba Diving Volunteer of the Wave Foundation at the Newport Aquarium
- Board Member of the Cincinnati Estate Planning Council
- Member: Financial Planning Association
- Member: National Association of Professional Financial Advisors
- Member: National Association of Estate Planning Councils.

**Additional Compensation:** Detailed above in Other Compensation section.

**Supervision:**

Rob is the Owner and Chief Compliance Officer. All Supervision is his responsibility. Susan Rushworth reviews his activities through office interactions as well as reviewing activities through our client relationship management system. *Susan Rushworth's contact information: (513) 469-8100 x10 or srushworth@fwag.com*

---

**Employee: Susan A. Rushworth****Educational Background:**

- Born: April 21, 1951
- A.A. in English from St. John's College, 1990
- FINRA Series 7 (General Securities Registered Representative), 1998 – inactive
- FINRA Series 24 (General Securities Principal), 2001 - inactive

**Business Experience:**

- 07/04 – Present: Family Wealth Advisory Group, LLC – Director of Operations and Client Service
- 04/00 – 06/04: Lincoln Financial Advisors – Director of Financial Planning
- 04/98 – 04/00: American Express Financial Advisors – Financial Advisor
- 01/94 – 04/98: H&R Block Tax Services – Branch Manager

**Disciplinary Information:** None

**Other Business Activities:** None

**Additional Compensation:** None

**Supervision:**

Susan is supervised by Rob Grossheim. He reviews Susan's work through frequent office interactions as well as remote interactions. He also reviews Susan's activities through our client relationship management system. *Rob Grossheim's contact information: (513) 469-8100 x12 or rgrossheim@fwag.com*

---

**Independent Contractor: James J. Hoskins, CFP®****Educational Background:**

- Born: November 27, 1950
- B.S. in Chemical Engineering from the University of Toledo, 1972
- M.S. in Chemical Engineering from the University of Toledo, 1974
- M.B.A. in Marketing from Xavier University, 1982
- Certified Financial Planner™, 2006
- FINRA Series 7 (General Securities Registered Representative), 2003 – inactive
- FINRA Series 66 (Uniform Combined State Law Exam), 2003

**Business Experience:**

- 01/05 – Present: Family Wealth Advisory Group, LLC – Lead Advisor
- 03/03 – 01/05: Lincoln Financial Advisors – Registered Representative and Investment Advisor Representative
- 10/73 – 06/02: Procter & Gamble – Director of Product Development and Technology Licensing

**Disciplinary Information:** None

**Other Business Activities:** Member of the Financial Planning Association

**Additional Compensation:** None

**Supervision:**

Jim is supervised by Rob Grossheim. He reviews Jim's work through frequent office interactions as well as remote interactions. He also reviews Jim's activities through our client relationship management system. *Rob Grossheim's contact information: (513) 469-8100 x12 or rgrossheim@fwag.com*



---

**Independent Contractor: Herbert S. Huesman, CLU<sup>®</sup>, ChFC<sup>®</sup>****Educational Background:**

- Born: April 4, 1952
- B.S. in Biology from the University of Cincinnati, 1974
- Chartered Life Underwriter<sup>®</sup> (CLU<sup>®</sup>), 1980
- Chartered Financial Consultant<sup>®</sup> (ChFC<sup>®</sup>), 1982
- FINRA Series 7 (General Securities Registered Representative), 1983 – inactive
- FINRA Series 63 (Uniform Securities Agent State Law Exam), 1992 – inactive
- FINRA Series 65 (Uniform Investment Advisor State Law Exam), 2003

**Business Experience:**

- 08/07 – Present: Family Wealth Advisory Group, LLC – Lead Advisor
- 01/75 – Present: John J & Thomas R Schiff & Co. – Vice President of Sales\*
- 01/85 – Present: Herbert S Huesman & Associates, Inc – Insurance Sales\*
- 12/02 – 08/07: LM Kohn & Company Inc – Registered Representative and Registered Investment Advisor Representative
- 01/83 – 12/02: Lincoln Financial Advisors – Registered Representative and Registered Investment Advisor Representative

**Disciplinary Information:** None**Other Business Activities:**

- \* While Family Wealth Advisory Group, LLC is a fee only financial planning and investment management firm, Herb is the only advisor actively involved in the sale of insurance related products. Therefore, he will also receive compensation (or commissions) from these companies based upon products recommended and implemented by Herb. FWAG does not participate nor receive any part of these commissions or compensation nor do any other advisors associated with FWAG.

**Additional Compensation:** See above – Other Business Activities.**Supervision:**

Herb is supervised by Rob Grossheim. He reviews Herb's work through frequent local and remote interactions. He also reviews Herb's activities through communication and note reviews taken by Herb. *Rob Grossheim's contact information: (513) 469-8100 x12 or rgrossheim@fwag.com*