

**AdviseMe National Advisors, Registered Investment Advisor**

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**January 1, 2012**

**FORM ADV PART 2  
BROCHURE**

**This brochure provides information about the qualifications and business practices of AdviseMe National Advisors, a registered investment advisor. If you have any questions about the contents of this brochure, please contact us at 216-595-0800. 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 AdviseMe National Advisors is also available on the SEC's website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov). The IARD/CRD number for AdviseMe National Advisors is 141129.**

**Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**



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## **Advisory Services**

### **A. Services Offered**

AdviseMe National Advisors, Registered Investment Advisor ("AdviseMe NA") offers a variety of services to meet the needs of its clients. Compensation also takes a variety of forms and is described as follows:

- **Pension Consulting:** AdviseMe NA works with its clients in every aspect of the retirement plan process for their company sponsored retirement plans including existing investment plan review, existing document review, enrollment and education, on-going plan maintenance and support.
- **Individual Consulting:** AdviseMe NA provides investment advice to individuals on an unsolicited basis on their personal investments. These clients are usually related in some way to AdviseMe NA's retirement plan clients (usually an employee of the plan sponsor).
- ** Managed Accounts:** A fee-based managed account program offered to participants of our retirement plan clients who officially join the program by signing a Plan Sponsor agreement. It offers the participant the right to retain AdviseMe NA as their Individual Investment Advisor for their own individual 401(k) account. After working with each participant to determine their proper investment suitability, AdviseMe NA assumes control of their individual account in regards to the choosing of the investments by building, with the assistance of HPM Partners, LLC, and placing their accounts into the proper asset allocation models that vary by risk. An investment advisory agreement is executed between the participant and AdviseMe NA.
- ** Managed Accounts:** A fee based managed account program offered to clients for their individual investments, IRAs, rollover IRAs, trusts or qualified plans (pooled). AdviseMe NA acts as the Individual Investment Advisor for their account. After working with the client, the proper investment suitability is determined and AdviseMe NA assumes control of their account. AdviseMe NA works with HPM Partners, LLC who selects the investments and creates the proper asset allocation model that varies by risk. An investment advisory agreement is executed between the participant and AdviseMe NA.

AdviseMe NA will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will AdviseMe NA accept or maintain custody of a client's funds or securities.

- **Financial Planning Services:**

In addition to asset management services, AdviseMe NA may provide Financial Planning Services to some of its clients. AdviseMe NA's Financial Planning services may include recommendations for portfolio customization based on their client's investment objectives, goals and financial situation. Financial Planning Services may also include recommendations relating to investment strategies as well as tailored investment advice the service(s).

## **B. Fees**

For the payment of asset management services, all fees paid to AdviseMe NA for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund's or variable product's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the sponsor also imposes sales charges, a client may pay an initial or deferred sales or surrender charge. A client could invest in these products directly, without the services of AdviseMe NA. In that case, the client would not receive the services provided by AdviseMe NA which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by AdviseMe NA to fully understand the total fees to be paid.

Custodians may charge accounts for various transactional costs, retirement plan, and administrative fees. In addition, some mutual fund assets deposited in the account may have been subject to 12(b)(1) fees and other mutual fund annual expenses as described in each fund's prospectus. Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisors fee is separate and distinct from the custodian and execution fees.

Clients may request to terminate their advisory contract with AdviseMe NA, in whole or in part, by providing advance written notice. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client. Client's advisory agreement with the Advisor is non-transferable without Client's written approval.

## **C. Wrap Fee Programs**

AdviseMe NA does not engage in wrap fee programs, directly.


## **D. Assets Under Management**


As of January 1, 2012, AdviseMe manages a total of \$33,000,000 on a non-discretionary basis and \$60,000,000 on a discretionary basis.

## **Fees and Compensation**

**Pension Consulting:** Clients are billed an advisory fee for services outlined in their Pension Advisory Agreement. These fees may be negotiated at the sole discretion of the advisor and range from 0.25% to 1.5%. Invoices are prepared quarterly in arrears. The fee is computed using the fair market value of the total assets in the plan on the last day of the calendar quarter times the negotiated rate. Fees are prorated for accounts opened during the quarter. Fees are non-negotiable and are due within 30 days. Checks are made payable to AdviseMe National Advisors.

**Individual Consulting:** Clients are billed in one of two ways. They are either billed an asset management fee or are billed a one-time consulting fee based on either a one-time fixed fee or an hourly rate for services outlined in their Pension Advisory Agreement. If the fee is an asset management fee, it is computed using the fair market value of the total assets in the account on the last day of the calendar quarter times the negotiated rate. These fees may be negotiated at the sole discretion of the advisor and range from 0.25% to 1.5%. Invoices are prepared quarterly. Fees are prorated for accounts opened during the quarter. Invoices for fixed-fee or hourly arrangements are billed upon completion of the services. Fees are non-negotiable and are due upon receipt. Checks are made payable to AdviseMe National Advisors.

** Managed Accounts:** Pursuant to an investment advisory agreement signed by each client, the client will pay a quarterly asset management fee, payable in arrears, as outlined in the agreement based on the amount of assets managed as of the end of the last day of each calendar quarter. The agreement authorizes that their account be directly debited for this fee. The custodial broker dealer is responsible for computing the fee on our behalf. In some instances, the Plan Sponsor has assumed the responsibility of paying this fee for their participants and as such, the investment advisory agreement states that the plan sponsor is assuming all costs. The Plan Sponsor is then invoiced directly on a quarterly basis in arrears. The fee is computed using the fair market value of the total assets in the plan on the last day of the calendar quarter times the negotiated annual rate, which ranges from 0.25% to 0.75%. Each quarterly billing is 25% of the calculated annual fee. Fees are non-negotiable and are due upon receipt. Checks are made payable to AdviseMe National Advisors or wired directly from the custodial broker dealer to AdviseMe National Advisors.

** Managed Accounts:** Pursuant to an investment advisory agreement signed by each client, the client will pay a quarterly asset management fee, payable in arrears at the annual rate of 1.5% times the amount of assets managed as of the end of the last day of each calendar quarter. Each quarterly billing is 25% of the calculated annual fee. Trust Company of America (the custodian) computes and debits this fee from their accounts on our behalf. 1/2 of the fee (0.75%) is sent to AdviseMe National Advisors and the other 1/2 (0.75%) is sent HPM Partners, LLC.

### **Type of Clients**

AdviseMe NA provides investment advisory services to individuals, corporations and other business entities. AdviseMe NA does not have a minimum account size however certain third party asset managers require a minimum investment to open an account. The specific amounts are detailed in the third party providers' agreements. Accounts below the stated minimums may be accepted on an individual basis at the discretion of AdviseMe NA and the platform sponsor.

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

AdviseMe NA utilizes methods of analysis and investment strategies, including charting, fundamental, cyclical and technical, in formulating investment advice or managing assets. The main sources of information utilized are financial newspapers and magazines, research materials prepared by others, corporate rating services and annual reports, prospectuses and lastly filings with the Securities and Exchange Commission. Clients must be aware that investing in securities involves risk of loss that clients should be prepared to bear.

AdviseMe NA recommends general securities in client portfolios that include but are not limited to individual stocks, mutual funds, government securities and Real Estate Investment Trusts (REITS).

### **Disciplinary Information**

A. Neither AdviseMe NA or an AdviseMe NA manager have been or are currently involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which AdviseMe NA or the AdviseMe NA manager:

1. has been convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. has been the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. has been found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. Neither AdviseMe NA or an AdviseMe NA manager have been involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which AdviseMe NA or an AdviseMe NA manager:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
  - i. denying, suspending, or revoking the authorization of AdviseMe or a AdviseMe manager to act in an investment-related business;
  - ii. barring or suspending AdviseMe NA or an AdviseMe NA manager's association with an investment-related business;
  - iii. otherwise significantly limiting AdviseMe NA or an AdviseMe NA manager's investment-related activities; or
  - iv. imposing a civil money penalty of more than \$2,500 on AdviseMe NA or an AdviseMe NA manager.

C. A self-regulatory organization (SRO) proceeding in which AdviseMe NA or an AdviseMe NA manager:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership;
  - i. otherwise significantly limited from investment-related activities; or fined more than \$2,500.



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

- A. Advisory Representatives are also securities Registered Representatives with AdviseMe NA. As such, they are able to sell securities products to investment advisory clients.
- B. AdviseMe NA Representatives are not registered as a futures commission merchant, commodity pool operator, a commodity-trading advisor, or an associated person of the foregoing entities.
- C. Certain AdviseMe NA Representatives are involved in the following business activities:
  - 1. independent investment advisor or pension consultant;

In April 2009, a new entity called Pension Advisors – Puerto Rico was created. Javier Cordero is the new Registered Representative through Financial Telesis doing business as Pension Advisors – Puerto Rico in Puerto Rico. Javier Cordero will serve as the Investment Advisory Representative through AdviseMe NA. He will provide pension and individual consulting services as well as offer the managed account programs to his clients.

Investment Advisor representatives of AdviseMe NA may from time to time provide pension consulting services to clients through their affiliated pension consulting service, Pension Solutions, Inc. dba Pension Advisors and Pension Advisors – Puerto Rico.

In March 2012, a new entity called Pension Advisors – Atlanta was created. James Izett is the new Registered Representative through Financial Telesis doing business as Pension Advisors – Atlanta in Atlanta, Georgia. James Izett will serve as the Investment Advisory Representative through AdviseMe NA. He will provide pension and individual consulting services as well as offer the managed account programs to his clients.

All activities are disclosed in writing, to the AdviseMe NA Compliance Department. Advisory Representatives may receive compensation from these activities. Clients are not obligated to obtain these services through AdviseMe NA Advisory Representative.

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

AdviseMe NA has adopted a Code of Ethics (the "Code") that sets forth the basic policies of ethical conduct for all its employees of the adviser including its registered and non-registered assistants ("Covered Persons"). The Code requires that all Covered Persons conduct all business dealings in an ethical fashion, and encourages all Covered Persons to meet not only the technical requirements of the Code but also its spirit. Under the Code, Covered Persons have an affirmative duty of care, loyalty and honesty and must act in the best interest of their clients.

The Code requires Covered Persons to comply with all federal securities laws. In addition, Covered Persons are prohibited from defrauding, misleading or manipulating a client in any way in connection with the purchase or sale of a security. Further, Covered Persons may not favor the interests of one client over the other.

In the course of normal business, Covered Persons may receive confidential information concerning clients and potential clients. The general rule, as discussed in the Code, is that this information should never be communicated to anyone other than Advisory Representatives, assistants and employees who need to know, and where appropriate, to the participants involved in a specific transaction.

The Code has strict guidelines regarding personal securities transactions, designed to ensure that Covered Persons are not misusing their inside positions at clients' expense. Covered Persons are specifically prohibited from profiting personally, directly or indirectly, as a result of knowledge about a security or transactions. The Code governs personal trading by each employee of AdviseMe NA deemed to be a Covered Person and is intended to ensure that securities transactions effected by Covered Persons of AdviseMe NA are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates.

AdviseMe NA and/or its advisory representatives may from time to time purchase or sell products that they may recommend to clients. Advisory representatives for AdviseMe NA are also Registered Representatives with Financial, Telesis, Inc., a FINRA registered broker/dealer.

To enable AdviseMe NA to monitor compliance with the Code, we require that Covered Persons provide us with duplicate copies of confirmations or statements for accounts that they hold at other financial institutions. We collect and maintain records of securities holdings and securities transactions affected by Covered Persons. These records are reviewed to identify and resolve potential conflicts of interest.

AdviseMe NA's Code of Ethics is available upon request.

### **Brokerage Practices**

- A. Clients may specify which broker-dealer to use or the Advisory Representative may make recommendations. Generally, these recommendations are based on the Advisory Representative's perception of the breadth of services offered and quality of execution. However, the client may pay commissions or fees that are higher or lower than those that may be obtained from other broker-dealers for similar services.
1. Research and Other Soft Dollar Benefits. AdviseMe NA does not engage in soft dollar benefits. AdviseMe NA does not use client brokerage commissions (or markups or markdowns) to obtain research or other products or services.
  2. Directed Brokerage. AdviseMe NA does not routinely recommend, request or require that a client direct AdviseMe NA to execute transactions through a specified broker-dealer.

## **Review of Accounts**

**Pension Consulting:** Quarterly plan reviews are conducted with representatives from the company sponsored retirement plan to discuss investment performance, specific plan trends and new legislative updates. A Fund Performance schedule is prepared quarterly as a platform for review. The review consists of using a combination of historical fund returns, ratio analysis and Morningstar ratings. This systematic approach allows for informed decisions on the investment options made available to the Plan as well as the ability to identify any under-performing funds. A comprehensive fund analysis of the investment alternatives is also prepared quarterly based on style orientation, peer benchmark returns and regression statistics.

Our affiliated pension consulting firm, Pension Solutions, Inc. dba Pension Advisors, has entered into a consulting agreement with Horizon Investments, LLC to provide consulting services to the Pension Consulting Business. Consulting services include, but are not limited to, the review of the total fund lineup available to clients of Pension Advisors. HPM Partners, LLC provides investment recommendations of the top three funds per financial category and/or sector on a periodic basis. Either party may terminate this agreement by giving at least 60 days notice to the other party of its intent to terminate.

The Plan is also reviewed in its entirety making sure that the fees remain competitive, that the Plan is adhering to the Investment Policy Statement that the plan document is current with all legislative updates and that enrollment is satisfactory.

**Individual Consulting:** All individual accounts are monitored on an ongoing basis. The accounts are reviewed for their holdings, their account balances and their performance history. An Account Summary schedule is prepared quarterly as a platform for review. The review consists of using a combination of historical fund returns, ratio analysis and Morningstar ratings. This systematic approach allows for informed decisions on the investment options made available to the individual as well as the ability to identify any under-performing funds.

The Chief Compliance Officer, David Krasnow, performs the quarterly reviews of all individual accounts. If there is a need for further review, it will be performed by David Krasnow.

The client will receive written statements, no less than quarterly, directly from the account custodian. These reports list the account positions, activity in the account over the covered period, and other related information. We also meet with the individual clients periodically to personally review the account positions as well as any change in status they may have.


**AdviseMe!® Managed Accounts:** Accounts are monitored on an ongoing basis for consistency with the investment strategy of the model portfolio and for the performance of the individual mutual funds within the model. Triggering factors that would effect a change in the asset allocation model are a client's own investment objectives, a change in overall market conditions or under or out-performance by a particular fund. Asset Allocation Accounts are re-balanced on a regular basis and re-optimized when deemed necessary by the Advisor for those participating in the Model Portfolio/Asset Management Program. Re-balancing is accomplished by reallocating assets to original asset targets and re-optimizing involves setting new target asset category percentages.

Our affiliated pension consulting firm, Pension Solutions dba Pension Advisors, has entered into a consulting agreement with HPM Partners, LLC to provide consulting services to the **AdviseMe!**® Managed Account program. Consulting services include, but are not limited to, the recommendation and on going monitoring of the asset allocation models. HPM Partners, LLC provides the asset allocation breakdowns for all of the **AdviseMe!**® portfolios. Either party may terminate this agreement by giving at least 60 days notice to the other party of its intent to terminate.

The client will receive written statements no less than quarterly directly from the account custodian. These reports list the account positions, activity in the account over the covered period, and other related information.

In addition, the client will receive other supporting reports from AdviseMe NA such as return information, reports from Mutual Funds, Asset Managers, Trust Companies or Custodians, Insurance Companies, Broker/Dealers and others who are involved with client accounts.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

 **AdviseMe!** Managed Accounts: HPM Partners, LLC, monitors Accounts on an ongoing basis. They continuously evaluate the global macro-economic landscape and sift through technical market data in order to evaluate the top line allocation of the portfolios. They also monitor the performance of the mutual funds being held within these allocations to ensure they are performing as expected. The goal of the monitoring process is to deliver the best risk-adjusted opportunity for the participants. They make sure that the portfolios continue to be on track to achieve investors' goals, produce acceptable returns in relation to risk, and feature an acceptable level of risk.

AdviseMe requires that clients establish an account with Trust Company of America who acts as custodian. They maintain custody of the client's asset and provide recordkeeping services. They also create and distribute the quarterly account statements directly to the client. These statements list the account positions, activity in the account over the covered period, and other related information.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

### **Client Referrals and Other Compensation**

- A. AdviseMe NA does not engage in activity with non-clients to gain economic benefits including sales awards or other prizes.
- B. AdviseMe NA does not directly or indirectly compensate any person who is not an AdviseMe NA supervised person for client referrals.

### **Custody**

AdviseMe NA does not maintain custody of client funds or securities.

## **Investment Discretion**

### **For Managed Accounts Only:**

For **AdviseMe!**<sup>®</sup> Managed Accounts and **AdviseMe!** Managed Accounts, AdviseMe NA has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by AdviseMe NA will be in accordance with each client's investment objectives and goals.

**Best Execution:** As an investment advisory firm, AdviseMe NA has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. AdviseMe NA's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. AdviseMe NA will execute its transactions through an unaffiliated broker-dealer. The broker-dealer will be chosen based on the following: 1) the broker's capital depth, 2) the broker's market access, 3) the broker's transaction confirmation and account statement practices, 4) our knowledge of negotiated commission rates and spreads currently made available, 5) the nature and character of the markets for the security to be purchased or sold, 6) the desired timing of the transaction, 7) the execution, 8) clearance and settlement capabilities of the broker selected and others considered, 9) our knowledge of any actual or apparent operational problems of a broker and 10) the reasonableness of the commission or its equivalent for the specific transaction. Based on the above criteria, AdviseMe NA may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker. This would justify higher commissions (or their equivalent) than other transactions requiring routine services. If AdviseMe NA is directed by the client to direct trades to a specific broker dealer other than the custodian. Typically used by AdviseMe NA for trade execution, it is disclosed that AdviseMe NA's ability to negotiate commissions (where applicable), obtain volume discounts, or otherwise obtain best execution may not be as favorable as might otherwise be obtained.

**Order Aggregation:** AdviseMe NA may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. For the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of AdviseMe NA's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading



day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. AdviseMe NA may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

## **Voting Client Securities**

### **Proxy Voting**

AdviseMe NA will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, AdviseMe NA cannot give any advice or take any action with respect to the voting of these proxies and will not provide proxy voting services to its clients.

For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. Also, AdviseMe NA cannot give any advice or take action with respect to the voting of these proxies.

### **Financial Information**

AdviseMe NA does not require or solicit prepayment of fees per client, six months or more in advance and therefore is not required to file financial information with the Securities & Exchange Commission or state of Ohio where AdviseMe NA is domiciled.

## **Requirements for State-Registered Advisors**

### **AdviseMe NA Principal Executive Officers:**

- A. Certain Advisory Representatives may offer insurance products to clients. An inherent conflict of interest exists as Advisory Representatives may receive insurance commissions in addition to advisory fees. Clients are under no obligation to purchase insurance products through AdviseMe NA or through its Advisory Representatives.
- B. AdviseMe NA and its Managers have not been involved in the following:
  - 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a. an investment or an investment-related business or activity;
    - b. fraud, false statement(s), or omissions;
    - c. theft, embezzlement, or other wrongful taking of property;
    - d. bribery, forgery, counterfeiting, or extortion; or
    - e. dishonest, unfair, or unethical practices.
  - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a. an investment or an investment-related business or activity;
    - b. fraud, false statement(s), or omissions;
    - c. theft, embezzlement, or other wrongful taking of property;
    - d. bribery, forgery, counterfeiting, or extortion; or
    - e. dishonest, unfair, or unethical practices.

## **Additional Information**

### **Privacy Policy**

AdviseMe NA and its representatives collect non-public information about its clients from applications and other forms, which they receive from their clients and from oral and e-mail communications. AdviseMe NA never discloses the non-public information collected about its clients to anyone except in furtherance of our business relationship, and then only to those persons necessary to effect the transactions and provide the services that the Client authorizes (non-affiliated third parties such as broker-dealers, custodians, investment managers, etc.) or as otherwise provided by law.

If the client does not want us to disclose non-public, personal information to non-affiliated third parties, they have the option to opt out of these disclosures by directing us not make those disclosures other than disclosures permitted by law.

We restrict access to non-public information about our clients to those representatives and employees who need to know that information in order for them to provide them with our products and services. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard our client's non-public information.

Our written Privacy Policy will be provided to the Client at the time of the account opening. Annually, thereafter, a combined disclosure statement that includes the Privacy Policy, Business Continuity Plan, Code of Ethics and Brochure rule will be provided.

### **Business Continuity Plan**

AdviseMe NA has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur.

Contacting Us – If after a significant business disruption we cannot be contacted as usual, please call our alternative numbers or send an e-mail to the following addresses - David Krasnow (cell – (216) 337-6826, [david@pa401k.com](mailto:david@pa401k.com)) or David Krasnow (cell – (216) 337-6826, [david@pa401k.com](mailto:david@pa401k.com)) OR access the following web address – [www.pa401k.com](http://www.pa401k.com).

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

A copy of AdviseMe NA's Business Continuity Plan disclosure will be provided to the Client at the time of account opening and will be available at anytime upon request. Annually, thereafter, a combined disclosure statement that includes the Privacy Policy, Business Continuity Plan, Code of Ethics and Brochure rule will be provided.

**AdviseMe National Advisors, Registered Investment Advisor**

**24400 Chagrin Blvd #200, Beachwood, OH 44122**

**Phone: 216-595-0800**

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**PensionExpert@Pa401k.com**

**January 1, 2012**

**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

**This brochure supplement provides information about AdviseMe National Advisors that supplements the AdviseMe National Advisors, Registered Investment Advisor brochure. You should have received a copy of that brochure. Please contact AdviseMe National Advisors if you did not receive the firm's brochure or if you have any questions about the contents of this supplement.**

**Additional information about AdviseMe National Advisors is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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### **Educational Background and Business Experience**

**Name: David Krasnow**

Date of Birth 2/8/1969

**Education:**

Indiana University, Indianapolis, IN

1991, Bachelor of Arts

Licenses: Life & Health, Series 6 and 63

**Industry Experience:**

Pension Advisors

President: 1999 - present

24400 Chagrin Blvd #200

Beachwood, OH 44122

**Name: Javier Cordero**

Date of Birth 2/24/1973

**Education:**

Universidad del Sagrado Corazon, PR

1996, Bachelor of Arts

**Industry Experience:**

John Hancock & Signator

Sales Representative: 2000-2009

San Juan, PR

Pension Advisors Puerto Rico

President: 2009 - present

Centro Internacional de Mercadeo

Torre II Suite 602

Guaynabo, PR 00968

**Name: Yahaira Torres-Siaca**

Date of Birth 8/18/1975

**Education:**

Universidad de Puerto Rico Rio Piedras Campus, PR

1998, BBA Accounting

**Industry Experience:**

Walnut Street Securities

Registered Representative 2001-2004

Rio Piedras, PR

Pariter Securites

Registered Representative 2009-2012

Guaynabo, PR

NFP Securities

Registered Representative 2004-2009

Hato Rey, PR

Pension Advisors Puerto Rico

Vice President: 2012 - present

Centro Internacional de Mercadeo

Torre II Suite 602

Guaynabo, PR 00968

**Name: James Izett**

Date of Birth 9/14/1943



**Education:**

Southern Illinois, Carbondale, IL

1965, Bachelor of Science

**Industry Experience:**

AXA Advisors, LLC

New York City, NY

Registered Representative: 1980-2012

Pension Advisors Atlanta

912 Killian Hill Road, #205

Lilburn, GA 30047

President: 2012 - present

**Disciplinary Information**

- A. AdviseMe National Advisors is not and has not been the subject in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the supervised person
1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  3. was found to have been involved in a violation of an investment-related statute or regulation; or
  4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.
- B. AdviseMe National Advisors is not and has not been the subject of an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person
1. was found to have caused an investment-related business to lose its authorization to do business; or
  2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
    - (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business;
    - (b) barring or suspending the supervised person's association with an investment-related business;
    - (c) otherwise significantly limiting the supervised person's investment-related activities; or
    - (d) imposing a civil money penalty of more than \$2,500 on the supervised person.
- C. AdviseMe National Advisors is not and has not been the subject of a self-regulatory organization (SRO) proceeding in which the supervised person
1. was found to have caused an investment-related business to lose its authorization to do business; or
  2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

- D. AdviseMe National Advisors is not and has not been the subject of any other proceeding in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

### **Other Business Activities**

The supervised persons are registered with Financial Telesis, Inc.

### **Additional Compensation**

In the course of business, David Krasnow does not receive economic benefit from non-clients for providing advisory services. "Economic benefits" include sales awards and other prizes or any bonus that is based, at least in part, on the number or amount of sales, client referrals or new accounts.

### **Supervision**

AdviseMe National Advisors requires that persons providing investment advice must satisfy the minimum licensing standards established under applicable securities laws, rules and regulations of the states in which such advisory persons will be involved in providing advisory services. Unless an exemption is available, AdviseMe National Advisors' Investment Advisory Representatives will be required to qualify with the registration of the state where they conduct business.

AdviseMe National Advisors' Investment Advisory Representatives go through an initial and ongoing training regime to ensure they are providing prudent investment advice. AdviseMe National Advisors conducts quarterly meeting David Krasnow, Chief Compliance Officer, (216) 595-0700 performs quarterly reviews of all individual accounts.

### **Requirements for State-Registered Advisers**

- A. In addition to the events listed in Item 3 of Part 2B, AdviseMe National Advisors is not involved and has not been involved in one of the events listed below:
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a. an investment or an investment-related business or activity;
    - b. fraud, false statement(s), or omissions;
    - c. theft, embezzlement, or other wrongful taking of property;
    - d. bribery, forgery, counterfeiting, or extortion; or
    - e. dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a. an investment or an investment-related business or activity;
    - b. fraud, false statement(s), or omissions;
    - c. theft, embezzlement, or other wrongful taking of property;
    - d. bribery, forgery, counterfeiting, or extortion; or
    - e. dishonest, unfair, or unethical practices.
- B. AdviseMe National Advisors is not and has not been the subject of a bankruptcy petition.