

## **RWM FIRM BROCHURE**

**THIS BROCHURE PROVIDES INFORMATION ABOUT THE QUALIFICATIONS AND BUSINESS PRACTICES OF PEVENSEY FINANCIAL INC dba RUGGIE WEALTH MANAGEMENT. IF YOU HAVE ANY QUESTIONS ABOUT THE CONTENTS OF THIS BROCHURE, PLEASE CONTACT US AT 352-343-2700. 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 OUR FIRM IS ALSO AVAILABLE ON THE SEC'S WEBSITE AT:**

**[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

If you have any questions about this brochure, please contact us at:  
**Pevensey Financial, Inc dba Ruggie Wealth Management**  
**2100 Lake Eustis Dr., Tavares, FL 32778**  
**352.343.2700**

**A Registered Investment Advisor\*\***

*\*\*Registration does not imply a certain level of skill or training*

**MATERIAL CHANGES SINCE LAST BROCHURE**

Material events since our last publication of this item on 02/21/2012 include:

Fee Billing update (Item 5)

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#### 4. ADVISORY BUSINESS

**Firm Description.....**Pevensey Financial, Inc dba Ruggie Wealth Management ("RWM") is an SEC Registered Investment Advisor and has been registered since 10/2008.

**Principal Owners.....**Thomas H. Ruggie is 100% owner of Pevensey Financial, Inc.

**Types of Advisory Services.....**RWM offers Wealth Management and Financial Planning services. Our Wealth Management services consist of managing portfolio's for our clients in accordance with their investment objectives. Our advisory transacts business in mutual funds, stocks, bonds, commodities, options, private and public partnerships, variable annuities, real estate investment trusts, insurance and other investment products.

**Tailored Relationships.....**Advisory services are tailored to the individual needs of the clients, through quantitative and qualitative analysis and financial planning discovery meetings. Clients may restrict the range of investments used in their portfolios via notation on their Investment Advisory Agreement.

**Wrap Fee Programs.....**Advisor offers wrap fee account management, detailed in the APPENDIX I of this document. Wrap fee accounts are charged one fee for advisory and execution services. We receive a portion of this fee for our services. Please see our RWM WRAP FEE PROGRAM BROCHURE (Appendix I) for more information on this program.

**Client Assets.....**As of 06/30/2012, advisor manages approximately 230 million in assets on a discretionary basis, and approximately 4 million on a non-discretionary basis.

#### 5. FEES AND COMPENSATION

##### Advisory Fee Schedule.....

| Asset Range  | Pool I – RWM<br>Fixed/Opportunistic | Pool II – Carson<br>Investment Advisors<br>Advance & Protect | Pool III – RWM Dynamic<br>All Asset Strategy |  |
|--------------|-------------------------------------|--|--|--|
| First 500k   | .70%                                | 1.25%  | 1.25%  |  |
| 500k-1M      | .55%                                | 1.00%  | 1.00%  |  |
| 1M-3M        | .45%                                | .85%   | .85%   |  |
| 3M-5M        | .40%                                | .75%   | .75%   |  |
| 5M and above | .25%                                | .50%   | .50%   |  |

**Fee Billing.....**Management fees assigned to the accounts are negotiable and are based on the assets placed into each strategy, or pool as indicated above. Fees are payable quarterly in advance and are inclusive of execution costs. In as much as Adviser will pay these execution costs associated with account transactions, a potential disincentive to trade may be presented. Clients should review and understand the RWM Asset Management Program fully (see Appendix I), prior to engaging the Adviser's services.

For purposes of calculating Account Fees, all accounts are billed on a calendar quarter. The initial Account Fee will include a prorated fee amount for the partial quarter, in addition to the standard quarterly fee for the upcoming quarter. Subsequent Account Fee payments are due and assessed at the beginning of each quarter based on the value of the assets under management as of the close of business on the last business day of the preceding quarter as valued by the third-party custodian of the account. Additional deposits and withdrawals will be added or subtracted from portfolio assets, as the case may be, which may lead to an adjustment of the advisory fee. All Account Fees are deducted from the account pursuant to the RWM Investment Advisory Agreement.

Although expressed as a percentage, in certain situations where account minimums are not met, the Account Fee may be calculated as a flat annual fee. The greater of the assigned account fee percentage, or one fourth (\$750) of the annual minimum fee will be assessed to the account on a quarterly basis in advance.

**Other Fees.....**In addition to the Account Fee, client may also incur certain asset based and flat fee charges in connection with investments made through program platforms and custodians. It is important to note that when investing in RWM proprietary strategy models clients will incur an additional asset based management fees to their account. Additionally our recommendation of outside strategies and managers will also add additional asset based management fees to the account. Asset based fee totals are clearly disclosed to the client as part of the application process.

Other fees which may be imposed by third parties include, but are not limited to, the following: custodial annual account fees, other transaction charges and account service fees, IRA and qualified retirement plan fees, mutual fund or money market 12b-1, mutual fund, ETF or money market management and administrative expenses, omnibus processing fees, sub transfer agent fees, networking fees, certain deferred sales charges on previously purchased mutual funds transferred into the account, variable annuity expenses, administrative servicing fees for trust accounts, creation and development fees or similar fees imposed by unit investment trust sponsors, hedge fund investment management fees, managed futures investor servicing fees, participation fees from auction rate preferred securities, and other charges required by law. RWM may receive a portion of these fees through soft dollar arrangements detailed below. Further information regarding charges and fees assessed by a mutual fund, ETF or variable annuity are available in the appropriate prospectus.

**Fees paid in advance.....**All account fees are paid in advance. If an advisory contract is terminated prior to the end of the billing period in which fees have been paid in advance, a refund may be requested in writing to the Advisor, and a prorated refund will be issued, with the

accounts last billing amount divided by 90 and multiplied by the number of days remaining unused in the period. A refund will be issued directly to the account whenever possible.

**Additional Compensation.....**Conflict of interest: Associated persons of the advisor are registered representatives of Purshe, Kaplan, Sterling Investments (PKS), a registered broker/dealer, member of FINRA. In these capacities associated persons of the Adviser may recommend securities, insurance, or other products and receive compensation if products are purchased through the affiliated broker/dealer firm, which may be load-based commissionable products. This conflict is regulated by firm review of new accounts and purchases. Brokerage products are recommended only in the case where a similar product is not available in an advisory capacity. Clients are under no obligation to act upon any recommendations of the associated persons or effect any transactions through the associated persons if they decide to follow the recommendations.

Associated persons of the Adviser may also be licensed insurance agents. In this capacity associated persons of the Adviser may recommend insurance or other products, and receive compensation for those products separate from investment advisory fees.

## 6. PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

**Sharing of Capital Gains or Capital Appreciation.....**Advisor does not participate in performance based account fees.

## 7. TYPES OF CLIENTS

**Description.....**The RWM Asset Management Program is available for individuals, banks and thrift institutions, Investment Companies, Pension and Profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

**Account Minimums.....**A minimum account value of \$250,000 is required for RWM managed accounts. In certain instances, the minimum account size may be lowered and a flat fee for services will be imposed.

## 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

**Methods of Analysis.....**RWM manages client and model portfolios based on the research of its investment committee. This includes various methods of research, investment style and management philosophy:

The Retirement Distribution Strategy is a method of allocating and investing to ensure income and growth of investments over the life of our clients. The RDS utilizes the different Model Portfolio Pools in varying percentages in accordance with the client's income needs and risk tolerance levels as discovered in our client meetings.

Fund and ETF selection is based on various performance criteria and on the continual research of all investment opportunities. A point system is utilized for grading the funds for more specific review and possible addition or deletion from our tracking. Performance returns, Financial Ratios, Quartile Rankings, and Ratings are some of the considerations when grading funds and ETFs.

We are not currently recommending an individual equity portfolios, but have a Sell strategy for clients who transfer equities in under management where equities are graded and sold according to their grade. Any quality positions will be kept and added to our stock tracking list. If a position falls below standard, the position will be sold at that time.

**Investment Strategies.....**The RWM Investment Policy Committee is also responsible for oversight of RWM's investment selection process, and for reviewing and approving certain products to be offered in the RWM account, including, but not limited to hedge funds, alternative investments, REITs, and Structured Investments. The members of the Investment Policy Committee will be the registered advisory personnel of RWM.

**Risk of Loss.....**Different types of investments involve varying degrees of risk, including risk of loss. It should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific or past performance level. Prospective clients should read and understand this statement and all firm disclosure documents prior to engaging our firms services.

## 9. DISCIPLINARY INFORMATION

**Legal or Disciplinary Material events.....**Advisor and its registered personnel have no material legal or disciplinary events to disclose.

## 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

**Broker-dealer or Registered Representative.....**Some management persons of RWM are also registered representatives of Purshe, Kaplan, Sterling Investments (PKS), a registered broker/dealer, member of FINRA. Presently this includes: Thomas Ruggie, Louis Shinaman, and Kathleen McQueen.

While our primary function is that of an investment advisor, we have established this affiliation in order to best serve our clients needs. There is a potential conflict of interest when a brokerage product is recommended, as compensation will be received thorough the affiliated broker/dealer firm (PKS) and not from the client directly as in our fee-based services. Clients are under no obligation to act upon any of the brokerage recommendations of the associated person, nor are they obligated to transact the brokerage business through our firm if they so choose to follow our recommendations. In no case will we receive fees on a holding which a brokerage commission

was also derived.

**Material Relationships or Arrangements with Financial Industry.....**Some management persons of RWM are also licensed insurance agents. Presently this includes: Thomas Ruggie, Louis Shinaman, and Kathleen McQueen.

While our primary function is that of an investment advisor, we have established this affiliation in order to best serve our clients needs. There is a potential conflict of interest when an insurance product is recommended, as compensation will be received through the insurance company and not from the client directly as in our fee-based services. Clients are under no obligation to act upon any of the insurance recommendations of the associated person, nor are they obligated to transact the insurance business through our firm if they so choose to follow our recommendations. In no case will we receive fees on an insurance holding where commission was also derived.

**Recommend or Select other Investment Advisors.....**Some management persons of RWM are also affiliated with and at some times recommend another investment advisor and pension consultant; 401k Generation.

Thomas Ruggie is a 50% owner of this affiliated entity. Although similar services are offered, the purpose of the separation is for client segregation purposes and to best fit the client to the appropriate service program and fee structure. It is the client's choice which services would best fit their needs and they may utilize either firm's services without restriction. Referral fee arrangements exist between the two advisory firms, however this does not increase or negatively affect the clients fee rate with either firm.

Some management persons of RWM are also affiliated with and at some times recommend another investment advisor; Carson Wealth Management.

Thomas Ruggie currently serves as a board member to the Carson Institutional Advisory Council. Although similar services are offered when Carson's management is proposed, a recommendation to this model would be to best fit the client to the appropriate program and strategy as based on our RDS and planning. It is the client's choice which management strategy to utilize and they may utilize any of our strategy's within their portfolios without restriction. Referral fee arrangements do not exist between the two advisory firms, nor is Mr. Ruggie compensated for his position on the board.

## 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

**Code of Ethics.....**The Adviser 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. The Adviser 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.

**Recommending Securities with Material Financial Interest.....**On occasion we may recommend the purchase of a security in which a principal or associated person of this firm already has a material financial interest in. It is our practice to always provide full disclosure of any facts which would be relevant to your decision. This would likely be a verbal disclosure with a written, signed disclosure upon effecting the transaction.

**Investing in same securities recommended to clients.....**Although we do not generally recommend individual security portfolios, on occasion an advisor or firm personnel may hold the same security that a client holds as well. With respect to this conflict, at any time trades are placed in the same security for both a client and an advisor on the same day, the customer's trade will always take time precedence over firm personnel trades.

More detail can be found in our code of ethics policy; a copy is available at your request.

The Code covers a range of topics that include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. The Adviser will provide a copy of the Code to any client or prospective client upon request.

## 12. BROKERAGE PRACTICES

**Selecting brokerage firms.....**Securities transactions for RWM Managed accounts are maintained at a "qualified custodian" such as TD Ameritrade, Schwab or LPL, with no commissions being paid to RWM from these custodians. While RWM has made every attempt to obtain the best custodial arrangements possible, there is no assurance that execution will be obtained at best rates. We consider a wide range of factors, including:

- Combination of transaction and reporting services
- Custody asset services (generally without a separate fee for custody)
- Capability to execute, clear and settle trades
- Capability to facilitate transfers and payments to and from accounts
- Breadth of investment products made available
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services and willingness to negotiate them
- Reputation, financial strength and stability of the provider
- Their prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below

Clients should consider and discuss with their IAR the selection of the custodian and whether certain costs or disadvantages may arise as a result of the use of either of the custodians. While we recommend custodians, you will ultimately decide which to utilize and you will be entering into an agreement directly with them for your account. Clients are under no obligation to implement a plan or its recommendations through our custodian choices. We are independently owned and operated and not affiliated with any custodian.

**Research and Soft Dollars.....**"Soft Dollars" are research and other products which are provided to us due to of our affiliation with a custodian. When selecting custodians for use in our program we have made choices based on our needs for servicing the accounts as well as client needs in account features and services. Our selection of your custodian is not based on soft dollar benefits, but will be based on net assets as well as service level required.

Benefits received which may benefit the advisor and not the client accounts may include: educational conferences and events, business entertainment of our personnel, technology, compliance, legal and business consulting, publications and conferences on practice management and business succession, and access to human capital consultants. Custodian(s) may provide some of these services themselves, or provide access to a third party and may discount or waive its fees or pay all or a part of a third party's fees for services.

Benefits received which assist the Adviser but may not directly benefit you: software and training on technology that provides access to client account data, research, pricing information and other market data; back-office training and support functions; recordkeeping, advisory fee payment processing and client reporting. These services may be used to service Adviser's accounts, including accounts not maintained with the custodian whom is providing the service.

Benefits received that benefit you: Custodian(s) institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through custodian(s) include some to which we might not otherwise have access or would require a significantly higher minimum initial investment by our clients.

a/b. Because custodians stipulate that we must keep a minimum amount of assets in their custody to receive soft dollar benefits, and when client brokerage commissions are used to fulfill this purpose, the Adviser is in a position to benefit without having to pay for the products and services provided. This may create an incentive to recommend a custodian based on the Advisers interest in receiving these benefits, rather than in receiving best execution for our clients. Because Advisor's clients do not pay more for investment transactions effected or assets maintained at either custodian as a result of these benefits and with respect to the amount of total assets under our management we do not believe that maintaining this minimum amount at certain custodians presents a material conflict of interest. Additionally, there is no corresponding commitment made by the Advisor to invest in any specific funds, securities, or other products as a result of the benefits.

c. n/a

d. Soft dollar benefits are used without regard to which accounts cause the benefits to be derived, including use of the benefits on accounts that may be held with a different custodian altogether.

e. During our last fiscal year, benefits were derived from our affiliation with custodian(s) to include: participation in the annual custodian(s) conference(s), Morningstar Office software, Marketing support, Transfer fee reimbursements, and other products used by the Advisor in the furtherance of our investment advisory business operations.

**Brokerage for client referrals.....**We do not receive client referrals from any of our affiliations, nor do we direct brokerage services to firms for this purpose.

**Directed Brokerage.....**We do not recommend or permit for clients to direct transactions or specify a broker for execution.

**Order Aggregation.....**Purchases and sales of securities are aggregated whenever possible in order to obtain best execution for our clients. There is generally a minimum share quantity that is required in order to effect an aggregate transaction.

### 13. REVIEW OF ACCOUNTS

**Periodic Reviews.....**Because we use model portfolios, we are constantly evaluating the portfolio holdings and will make changes within client portfolio's proactively when necessary, and as our discretion permits. Client's financial plans are reviewed with a frequency determined and agreed upon in our initial planning stages with a client. Frequency of contact and in-person reviews are related to the clients need levels as well as the purpose and size of the accounts we manage. These financial plan reviews are important so that we may discuss and update any pertinent information regarding your plan; as well as ensure we are correctly pursuing your overall objectives with our account management. All client financial plans are reviewed by Thomas Ruggie.

**Review Triggers.....**Although they will be scheduled with a certain frequency, a review may be requested at any time by a client and is recommended when significant changes occur in your family (i.e. death, marriage, divorce, sale of business, etc.) These reviews will be conducted by an Investment Advisor Representative of our firm.

**Regular Reports.....**At a client review, written asset reports will be provided which aggregate the account holdings in which we manage. You will always receive statements from the custodian of the assets, and the values we give you on RWM reports should be verified against the custodian statements you receive directly. Aggregate reports can be requested at any time by our clients, but are not provided on a regular basis at this time.

### 14. CLIENT REFERRALS AND OTHER COMPENSATION

**Economic Benefits.....**We do not have any ongoing arrangements where an economic benefit is derived from someone who is not a client, however we are sometimes approached by fund companies and such and may partake in a hosted educational event for our clients benefit. Conflict may arise when Advisor benefits from these types of events, however every investment decision is made through our

firm investment committee and standardized process, without regard to financial benefits derived.

**Third Party Solicitors.....**Advisor may receive client referrals from both affiliated and unaffiliated individuals who are not its supervised persons. We currently have solicitor agreements of this nature in accordance with Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state requirements. Any such referral fee shall be paid solely from the Advisors investment management fee and shall not result in any additional charges to the client. If the client is introduced to the Advisor by an unaffiliated solicitor, the solicitor at the time of the solicitation, shall disclose the nature of its solicitor relationship and provide the prospective client a copy of the Advisors disclosure documents (Investment Advisory Agreement, ADV Part II as well as solicitation disclosure document).

## **15. CUSTODY**

**Account Statements.....**Under SEC regulations we are deemed to have custody of your assets if you authorize us to instruct the custodian to pay our advisory fees directly from your account. Even with this instruction in force, the custodian maintains the actual custody of your assets. Clients will always receive account valuation statements from the custodian of their assets directly and at least quarterly. Any values given on RWM reports should be verified against the custodian statements you receive directly.

## **16. INVESTMENT DISCRETION**

**Discretionary Authority for Trading and Limited Power of Attorney.....**Investment accounts are managed on a discretionary basis for our clients, meaning that we will manage your portfolio and have limited power of attorney to execute transactions without obtaining specific consent prior to every transaction. This authority is limited to accounts so designated via the Investment Advisory Agreement (IAA). Clients are free to specify when executing this contract, any limitations on our authority.

## **17. VOTING CLIENT SECURITIES**

**Proxy Voting.....**We do not have authority, nor do we accept authority to vote client securities in the portfolio we manage. Upon account set up, custodians are directed to forward this information to you directly. Should you have any questions with regard to voting proxies, we remain available to assist, however we will not proactively contact you with regards to any voting issues.

## **18. FINANCIAL INFORMATION**

**Prepayment of fees.....**We do not require prepayment of fees of more than \$1,200 per client six months or more in advance.



## **RWM WRAP FEE PROGRAM BROCHURE**

**THIS WRAP FEE PROGRAM BROCHURE PROVIDES INFORMATION ABOUT THE QUALIFICATIONS AND BUSINESS PRACTICES OF PEVENSEY FINANCIAL, INC DBA RUGGIE WEALTH MANAGEMENT. IF YOU HAVE ANY QUESTIONS ABOUT THE CONTENTS OF THIS BROCHURE, PLEASE CONTACT KATHLEEN MCQUEEN AT 352.343.2700 OR [KMCQUEEN@RUGGIEWEALTH.COM](mailto:KMCQUEEN@RUGGIEWEALTH.COM).**

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If you have any questions about the contents of this brochure, please contact us at:

**Pevensey Financial, Inc dba Ruggie Wealth Management  
2100 Lake Eustis Dr., Tavares, FL 32778  
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**A Registered Investment Advisor\*\***

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**MATERIAL CHANGES**

Material events since our last publication of this item on 02/21/2012 include: updated fee schedule (Item 4).

**INTRODUCTION**

Pevensey Financial, Inc dba Ruggie Wealth Management (“RWM”) is a registered investment advisor with the Securities and Exchange Commission pursuant to the Investment Advisers Act of 1940. RWM transacts business in mutual funds, stocks, ETF’s, bonds, commodities, options, private and public partnerships, variable annuities, real estate investment trusts, insurance and other investment products.

**ITEM 4:****SERVICES FEES AND COMPENSATION**

**SERVICES.....**The RWM program offers clients an asset management account in which RWM in its capacity as a registered investment advisor and its investment advisor representatives (“IARs”) direct and manage specified client assets.

The RWM program permits a client to authorize RWM to purchase and sell on a discretionary basis; no load, load waived mutual funds, equities, fixed income securities, options, hedge funds, managed futures, and structured products pursuant to investment objectives chosen by the client, to liquidate previously purchased no load, load waived mutual funds, equities, fixed income securities, options, hedge funds, managed futures, and structured products. RWM is also authorized to purchase and sell separate accounts within variable annuities under management. For purposes of this document, the term mutual fund includes both investment companies registered under the Investment Company Act of 1940, including exchange traded funds, and other pooled investment vehicles which are not registered.

**Advisory Wrap Fee Schedule.....**

| Asset Range         | Pool I – RWM<br>Fixed/Opportunistic | Pool II – Carson<br>Investment Advisors<br>Advance & Protect | Pool III – RWM Dynamic<br>All Asset Strategy |  |
|---------------------|-------------------------------------|--|--|--|
| <b>First 500k</b>   | .70%                                | 1.25%  | 1.25%  |  |
| <b>500k-1M</b>      | .55%                                | 1.00%  | 1.00%  |  |
| <b>1M-3M</b>        | .45%                                | .85%   | .85%   |  |
| <b>3M-5M</b>        | .40%                                | .75%   | .75%   |  |
| <b>5M and above</b> | .25%                                | .50%   | .50%   |  |

The Advisory Wrap Fee assigned to the account is negotiable, and is based on the value of the assets in the account, including cash holdings. The fee is payable quarterly in advance and is inclusive of execution costs. In as much as Adviser will pay these execution costs associated with account transactions, a potential disincentive to trade may be presented. Clients should review and understand this RWM WRAP FEE PROGRAM BROCHURE fully, prior to engaging the Adviser's services.

For purposes of calculating Account Fees, all accounts are billed on a calendar quarter. The initial Account Fee will include a prorated fee amount for the partial quarter, in addition to the standard quarterly fee for the upcoming quarter. Subsequent Account Fee payments are due and assessed at the beginning of each quarter based on the value of the assets under management as of the close of business on the last business day of the preceding quarter as valued by the third-party custodian of the account. Additional deposits and withdrawals will be added or subtracted from portfolio assets, as the case may be, which may lead to an adjustment of the advisory fee. All Account Fees are deducted from the account pursuant to the RWM Investment Advisory Agreement.

Although expressed as a percentage, in certain situations where account minimums are not met, the Account Fee may be calculated as a flat annual fee. The greater of the assigned account fee percentage, or one fourth (\$750) of the annual minimum fee will be assessed to the account on a quarterly basis in advance.

Securities transactions for RWM Wrap accounts are effected through a qualified custodian, with no commissions being paid to RWM. While RWM has made every attempt to obtain the best custodial arrangements possible, there is no assurance that execution will be obtained at best rates. Clients should consider and discuss with their IAR the selection of the custodian and whether certain costs or disadvantages may arise as a result of the possibility of less favorable executions in their RWM Managed account. Also notable, no agency cross transactions or principal transactions may be effected in RWM accounts. Clients are under no obligation to implement a plan or its recommendations through our custodian choices.

The RWM program may cost the client more or less than purchasing program services separately. Factors that bear upon the cost of the RWM account in relation to the cost of the RWM services purchased separately include: the type and size of the account, the historical and or expected size or number of trades for the account, and the number and range of supplementary advisory and client related services provided to the account.

The Advisor will recommend a custodian for its wrap fee program. As described in Part 2A Item 12 (previously), soft dollar arrangements are defined as compensation to the Advisor for referrals to custodians and pose a potential conflict of interest when making these recommendations. This applies to our referral of wrap accounts to custodian(s), as it is currently our only advisory account offered.

**Additional Fees.....** In addition to the Account Fee, client may also incur certain asset based and flat fee charges in connection with investments made through program platforms and custodians. It is important to note that when investing in RWM proprietary strategy models clients will incur an additional asset based management fees to their account. Additionally our recommendation of outside strategies and managers will also add additional asset based management fees to the account. Asset based fee totals are clearly disclosed to the client as part of the application process.

Other fees which may be imposed by third parties include, but are not limited to, the following: custodial annual account fees, other transaction charges and account service fees, IRA and qualified retirement plan fees, mutual fund or money market 12b-1, mutual fund, ETF or money market management and administrative expenses, omnibus processing fees, sub transfer agent fees, networking fees, certain deferred sales charges on previously purchased mutual funds transferred into the account, variable annuity expenses, administrative servicing fees for trust accounts, creation and development fees or similar fees imposed by unit investment trust sponsors, hedge fund investment management fees, managed futures investor servicing fees, participation fees from auction rate preferred securities, and other charges required by law. RWM may receive a portion of these fees through soft dollar arrangements detailed below. Further information regarding charges and fees assessed by a mutual fund, ETF or variable annuity are available in the appropriate prospectus.

Mutual funds may also charge a redemption fee if a redemption is made within a specific time period following the investment. The terms of any redemption fee are disclosed in the fund's prospectus. Transactions in mutual fund shares (e.g., for rebalancing, liquidations, deposits or tax harvesting) may be subject to a fund's frequent trading policy.

If an account is approved for trading on margin and the client has entered into a margin agreement, the client will be charged margin interest on any credit extended to or maintained by the client. This interest charge is in addition to the

annual investment advisory fee charged in connection with the account. The annual investment advisory fee will not be charged on any margin debit balance, rather only on the net equity of the account.

**Compensation to Recommending Parties.....**Advisor may receive client referrals from both affiliated and unaffiliated individuals who are not it's supervised persons. We currently have solicitor agreements of this nature in accordance with Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state requirements. Any such referral fee shall be paid solely from the Advisors investment management fee and shall not result in any additional charges to the client. If the client is introduced to the Advisor by an unaffiliated solicitor, the solicitor at the time of the solicitation, shall disclose the nature of its solicitor relationship and provide the prospective client a copy of the Advisors disclosure documents (Investment Advisory Agreement, ADV Part II as well as solicitation disclosure document).

#### **ITEM 5**

**Account Requirements.....**A minimum account value of \$250,000 is required for RWM managed accounts. In certain instances, the minimum account size may be lowered and a flat fee for services will be imposed.

**Types of Clients.....**The RWM WRAP FEE PROGRAM BROCHURE is available for individuals, banks and thrift institutions, Investment Companies, Pension and Profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

#### **ITEM 6:**

**Portfolio Manager Selection and Evaluation.....** RWM manages it's wrap fee program portfolios based on the research of its investment committee, comprised of the registered individuals of the Advisor. The RWM Investment Policy Committee is responsible for the oversight of RWM's investment selection process, and for reviewing and approving certain products to be offered in the RWM model strategies, including, but not limited to 3<sup>rd</sup> party managers, hedge funds, alternative investments, REITs, and Structured Investments.

RWM generally requires that individuals involved in determining or giving investment advice hold a bachelors degree (BA/BS) in Business Administration and/or Economics, and have at least two years of financial planning, advisory or brokerage related experience. An MBA degree is preferred. The Adviser requires that each associate have any licenses required to transact business on behalf of the firm.

**Third Party Performance Review.....**Advisor does not currently have an independent third-party review process to determine performance information or to verify accuracy or compliance with presentation standards, therefore, performance information may not be calculated on a uniform and consistent basis.

#### **ITEM 7:**

**Client Information.....**The IAR obtains the necessary financial data from his/her client and assists the client in setting appropriate investment objectives for the program account. The IAR obtains this information by having the client complete a Confidential Client Profile. The IAR is obligated to ask the client from time to time whether or not information in his/her Confidential Client Profile has changed so that updated information can be obtained when needed.

#### **ITEM 8:**

**Client contact with Portfolio Managers.....**There are no restrictions on the clients ability to contact and consult with their portfolio managers, or a participating representative of the RWM Investment Committee.

#### **ITEM 9:**

**Disciplinary Information.....** Advisor and its registered personnel have no material legal or disciplinary events to disclose.

**Code of Ethics.....**The Wrap program is subject to the same adopted Code of Ethics as detailed in the RWM Firm Brochure.

**Economic Benefits.....**The Wrap program is subject to the same Economic benefits as detailed in the RWM Firm Brochure.

**Third Party Solicitors.....**The Wrap program receives referrals from third party solicitors as detailed in the RWM Firm Brochure.

## RWM PROGRAM BROCHURE SUPPLEMENT

**THIS BROCHURE SUPPLEMENT PROVIDES INFORMATION ABOUT SUPERVISED PERSONS OF PEVENSEY FINANCIAL, THAT SUPPLEMENTS THE PEVENSEY BROCHURE. YOU SHOULD HAVE RECEIVED A COPY OF THAT BROCHURE. PLEASE CONTACT KATHLEEN MCQUEEN AT 352.343.2700 OR [KMCQUEEN@RUGGIEWEALTH.COM](mailto:KMCQUEEN@RUGGIEWEALTH.COM) IF YOU HAVE ANY QUESTIONS ABOUT THE CONTENTS OF THIS SUPPLEMENT.**

**ADDITIONAL INFORMATION ABOUT PEVENSEY FINANCIAL dba RUGGIE WEALTH MANAGEMENT AND ITS REGISTERED PERSONNEL IS AVAILABLE ON THE SEC'S WEBSITE AT: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

### **Educational background and business experience**

THOMAS H. RUGGIE, born in 1968; University of Central Florida, Bachelors Degree; Valencia Community College, Associates Degree Purshe, Kaplan Sterling Investments, Registered Rep, 06/2010 to present; 401k Generation, President, 01/2010 to present; The Ruggie Group, d/b/a Ruggie Wealth Mgmt, President, 01/1995 to present; LPL Financial, Registered/ Inv Adviser Rep., 05/1994 to 09/2009 RWE Private Wealth, Managing Partner, 04/2009 to 04/2010; W.S. Griffith Securities, Inc., Registered/ Inv Adviser Rep., 01/1992 to 05/2004

LOUIS M. SHINAMAN, born in 1971; Valencia Community College, Associates Degree, Purshe, Kaplan Sterling Investments, Registered Rep, 03/2011 to present; Ruggie Wealth Mgmt, Financial Consultant, 03/2011 to present; Brokers Express, Financial Advisor, 12/2008 to 04/2010; Empire Financial Group, Financial Advisor, 10/2007 to 12/2008; Pointe Capital, Financial Advisor, 09/2005 to 10/2007; Sterling Financial Investment Group, Financial Advisor, 03/2004 to 09/2005.

KATHLEEN MCQUEEN, born in 1978; Purshe, Kaplan Sterling Investments, Registered Rep, 06/2010 to present; Ruggie Wealth Mgmt, CCO/COO, 09/2008 to present; LPL Financial, Registered Rep., 10/2008 to 09/2009, Empire Financial Group, Registered Rep/Compliance Supervisor, 05/2006 to 09/2008; Jesup & Lamont Securities, Registered Rep, 04/2008 to 09/2008, Duggan, Joiner Financial, Administrative Assistant, 03/2002 to 10/2005, Linsco/Private Ledger, Registered Rep., 06/2003 to 10/2005, Herzfeld Retirement Group, Advisor Assistant, 03/1999 to 01/2001, Securities America, Registered Rep, 03/1999 to 01/2001.

AUDREY M. MANCUSO, born in 1986; Valencia Community College, Bachelors Degree, Ruggie Wealth Mgmt, Administrative/Financial Assistant, 08/2011 to present; Sagepoint Financial, Administrative Assistant, 10/2008 to 08/2011, American General Securities, Administrative Assistant, 04/2007 to 10/2008.

### **Disciplinary Information**

THOMAS H. RUGGIE – none

LOUIS M. SHINAMAN – none

KATHLEEN A. MCQUEEN – none

AUDREY M. MANCUSO – none

### **Other Investment Related Business Activities**

THOMAS H. RUGGIE –

401k Generation, President. 401kGeneration is a separately established RIA of which Mr. Ruggie owns 50% interest. 401k Generation provides advisory consultative services to 401k Plans, and as well operated as an Investment Advisory firm under the dba RW Direct. As 401k Generations services are commoditized, and RWM's are not, there is generally no conflict of interest as companies are given the choice between which company would best serve their needs and budget requirements.

PKS Investments, Registered Rep. Mr. Ruggie is also a registered representatives of Purshe, Kaplan, Sterling Investments (PKS), a registered broker/dealer, member of FINRA. In this capacity he may recommend securities, insurance, or other products and receive compensation if products are purchased through this affiliation. This conflict is regulated by firm review of new accounts and purchases. Brokerage products are recommended only in the case where a similar product is not available in an advisory capacity. Clients are under no obligation to act upon any recommendations of the associated persons or effect any transactions through the associated persons if they decide to follow the recommendations.

Independent Insurance, Agent. Mr. Ruggie may also independently contract with insurance companies as a licensed insurance agent. In this capacity, he may recommend insurance or other products, and receive compensation for those products separate from investment advisory fees or brokerage commissions.

LOUIS M. SHINAMAN –

PKS Investments, Registered Rep. Mr. Shinaman is also a registered representatives of Purshe, Kaplan, Sterling Investments (PKS), a registered broker/dealer, member of FINRA. In this capacity he may recommend securities, insurance, or other products and receive compensation if products are purchased through this affiliation. This conflict is regulated by firm review of new accounts and purchases. Brokerage products are recommended only in the case where a similar product is not available in an advisory capacity. Clients are under no obligation to act upon any recommendations of the associated persons or effect any transactions through the associated persons if they decide to follow the recommendations.

Independent Insurance, Agent. Mr. Shinaman may also independently contract with insurance companies as a licensed insurance agent.

In this capacity, he may recommend insurance or other products, and receive compensation for those products separate from investment advisory fees or brokerage commissions.

KATHLEEN A. MCQUEEN –

PKS Investments, Registered Rep. Ms. McQueen is also a registered representative of Purshe, Kaplan, Sterling Investments (PKS), a registered broker/dealer, member of FINRA. In this capacity she may recommend securities, insurance, or other products and receive compensation if products are purchased through this affiliation. This conflict is regulated by firm review of new accounts and purchases. Brokerage products are recommended only in the case where a similar product is not available in an advisory capacity. Clients are under no obligation to act upon any recommendations of the associated persons or effect any transactions through the associated persons if they decide to follow the recommendations.

Independent Insurance, Agent. Ms. McQueen may also independently contract with insurance companies as a licensed insurance agent. In this capacity, she may recommend insurance or other products, and receive compensation for those products separate from investment advisory fees or brokerage commissions.

AUDREY M. MANCUSO - none

**Additional Compensation**

THOMAS H. RUGGIE – none

LOUIS M. SHINAMAN – none

KATHLEEN A. MCQUEEN – none

AUDREY M. MANCUSO - none

**Supervision**

Supervision of all representatives is performed by Thomas H. Ruggie, President, and Kathleen McQueen as CCO. Mr. Ruggie does not directly report to any individual. Both can be reached at 352.343.2700.



**PEVENSEY FINANCIAL, INC. D/B/A RUGGIE WEALTH MANAGEMENT**  
**PRIVACY NOTICE**

Pevensey Financial, Inc. d/b/a Ruggie Wealth Management (referred to as "RWM") maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information ("information"). Through this policy and its underlying procedures, RWM attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of RWM to restrict access to all current and former clients' information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services to the client. RWM may disclose the client's information if RWM is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with RWM, including, but not limited to the client's other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by RWM in order to facilitate the commencement/continuation/termination of a business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for RWM (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

RWM permits only authorized employees and affiliates who have signed a copy of RWM's Privacy Policy to have access to client information. Employees violating RWM's Privacy Policy will be subject to RWM's disciplinary process. Additionally, whenever RWM hires other organizations to provide services to RWM's clients, RWM will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact Kathleen McQueen, Chief Compliance Officer.