



Householder Group Financial Advisors, LLC

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FORM ADV, PART 2A: FIRM BROCHURE

Item 1 – Cover Page

This Brochure provides information about the qualifications and business practices of Householder Group Financial Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us at 602-604-0600. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Householder Group Financial Advisors, LLC is a registered investment advisor. Registration of an investment advisor does not imply any level of skill or training. The oral and written communications of an advisor provide you with information about which you determine to hire or retain an advisor.

Additional information about Householder Group Financial Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Householder Group Financial Advisors, LLC is 149564.

Item 2 – Material Changes

On July 28, 2010, the United States Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated December 20, 2011 is an update to the previously released September 30, 2011 Brochure. This revised ADV includes:

- A description of the Householder Modelfolios which are managed based upon research provided by AthenaInvest.
- Revised language regarding discretionary accounts

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that clients receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide clients with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting our Compliance staff at 602-604-0600. Additional information about Householder Group Financial Advisors, LLC is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Householder Group who are registered, or are required to be registered, as investment adviser representatives of Householder Group.

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Item 4 – Advisory Business

Householder Group Financial Advisors, LLC. (hereinafter, “Householder Group”) is a limited liability company formed under the laws of the State of Arizona. Householder Group is owned by two Householder family owned companies, Householder, LLC and THG, Inc. As of December 31, 2010, Householder Group manages \$81,162,380 on a discretionary basis and \$180,414,150 on a non-discretionary basis.

In 1997, Scott A. Householder, the CEO of Householder Group, founded the registered investment advisory firm of Householder Group Estate and Retirement Specialists (“HG”). Having enjoyed a successful management career with a Fortune 100 global energy company and later with the one of the nation’s largest financial planning firms where he rose from an advisor to the Phoenix Division Vice President in just four years, Mr. Householder set out on his own to establish HG with a vision of building an independent, client focused advisory firm dedicated to placing the interests of clients first.

From the beginning, HG enjoyed remarkable success. After its first year of operation in 1998, SunAmerica Securities, Inc. named HG as their fastest growing Registered Investment Advisory firm in the nation. The very next year in 1999, Mr. Householder led HG through the acquisition of a large, longstanding advisory firm in Los Angeles with a history dating back to 1987. Over the next nine years, Mr. Householder worked tirelessly to bring the independent and client focused concept to clients in over 35 states.

In 2009, Mr. Householder identified an opportunity to broaden the scope of services available to clients by partnering with Securities Service Network, Inc. (“SSN”) a full service securities broker-dealer and member of both the Financial Industry Regulatory Authority (“FINRA”) and SIPC. As part of the transition to partnering with SSN, Mr. Householder seized the opportunity to consolidate business holdings and rebrand Householder Group Estate and Retirement Specialists to Householder Group Financial Advisors or, simply, Householder Group.

Today, a variety of investment advisory services are available through Householder Group. By leveraging a network of investment advisor representatives (“Advisors”) with over 40 offices across the United States, Householder Group is capable of offering personalized investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. Additionally, Householder Group and its Advisors are regularly sought out by major financial news networks for financial opinions and commentary.

Householder Group is an investment advisory firm offering a variety of advisory services customized to your individual needs. The services are more fully described below. You should carefully consider the information provided in this Brochure regarding Householder Group including its advisory services, fee arrangements and business practices before becoming an advisory client.

Householder Group offers the following services, which, are more fully described below.

- Portfolio Management Services
- Analysis, Recommendation & Monitoring of Third Party Managed Programs
- Financial Planning & Consulting Services
- Pension Consulting Services
- Seminar & Education Programs
- Estate Planning Services

Service 1: Portfolio Management Services

Householder Group provides discretionary and non-discretionary portfolio management services where the investment advice provided is custom tailored to meet your individual needs and investment objectives. You may impose restrictions and/or limitations on the investing in certain securities or types of securities. .

At the inception of the relationship, a Householder Group Advisor will conduct a data gathering interview with you to determine your investment objectives, risk tolerance and other relevant information and may review and/or develop an Investment Policy Statement. Based on the Investment Policy Statement and/or other relevant information, the Advisor will recommend an initial portfolio to you.

Upon your approval, your Advisor will implement the portfolio allocation. Householder Group will provide continuous and ongoing management of your account.

As further described below, Householder Group has entered into a relationship to offer you brokerage and custodial services through Securities Service Network ("SSN") and National Financial Services ("NFS"). There is no affiliation between Householder Group and SSN or NFS.

Householder Group Advisors offers advice on all exchange-listed securities and those traded over-the-counter. Advice is also offered on: variable annuities, variable life insurance, mutual funds, U.S. government securities, corporate debt instruments, certificates of deposit, municipal securities, security and index option contracts, and any other products that would be appropriate for the individual client, provided such products are approved for offering by SSN.

Your Advisor will develop an asset allocation strategy for you that consists of an agreed upon percentage mix of fixed income and equity investments. The fixed income allocation may include one or more of the following (a) cash (b) money market funds (c) U.S. government securities (d) foreign government bonds (e) U.S. corporate debt (f) foreign corporate debt (g) municipal securities (h) fixed income mutual funds and (i) any other appropriate fixed income investment. The equity portion of the allocation may include one or more of the following (a) individual stocks which are exchange listed (b) individual stocks which are traded over the counter (c) individual stocks issued by foreign corporations (d) equity mutual funds (e) variable annuity products (f) securities option contracts (non-discretionary only and limited to purchases of put options where the account is long the underlying security & writing covered calls) (g) interests in direct participation programs (h) Exchange Traded Funds ("ETFs") and (i) any other appropriate equity investment. Recommended mutual funds may be no-load or load-waived.

Householder Group also maintains three asset allocation portfolios consisting primarily of mutual funds and equities. These Householder Modelfolios include the following three portfolios with the listed allocations:

1. Tactical Allocation Portfolio
 - Conservative Allocation
 - Moderate Allocation
 - Aggressive Allocation
2. Strategic Fund Portfolio
 - U.S. Equity Funds
 - International Equity Funds
 - Global Equity Funds
3. Equity Portfolio
 - Pure Valuation/Profitability
 - Select Dividend Equity
 - Select Global Equity

The Householder Modelfolios are trades based upon information and research provided by Athena Invest. If you grant discretion to your advisor for these accounts, trades may be placed by the Householder Group Corporate office. In these cases you will not be contacted by the person actually entering the trades for your account. If you select to have a non-discretionary account which holds a Householder Modelfolio, you will be contacted by your Advisor prior to him/her entering the trade in your account.

However, your portfolio may be managed independently of these models.

Joint Advisors

On occasion, a client may establish an account with two Householder Group Advisors ("Joint Advisor Accounts"). For Joint Advisor accounts, one Advisor shall be responsible for managing assets in the Joint Advisor Account ("Managing Advisor") and the other Advisor ("Servicing Advisor") will be responsible for establishing and servicing the Joint Advisor Account, communicating and conducting meetings with the client concerning the Joint Advisor Account and the performance of the Joint Advisor Account, making investment recommendations to the client including the use of the

Managing Advisor to manage assets in the Joint Advisor Account and ensuring that all required documentation is maintained for the Joint Advisor Account. The client or the Servicing Advisor may discontinue the services of the Managing Advisor at any time and for any reason.

Service 2: Analysis, Recommendation & Monitoring of Third Party Managed Programs

In certain instances, your advisor may also designate all or a portion of your assets to be managed by a third-party manager. Householder Group utilizes a number of factors in selecting third-party managers including but not limited to performance, investment objectives, fees and methods of analysis. Additionally, third-party manager referrals may only be made to such third-party managers that are approved for use by Securities Service Network, the Broker/Dealer used by Householder Group. You will receive full disclosure of the third party manager's services, fees and other relevant information at the inception of the relationship by way of the manager's Form ADV Part 2 or equivalent disclosure document.

With respect to the recommendations of third-party managers, Householder Group Advisors will not offer advice on any specific securities or other investments, but will you to third-party investment managers, which will provide advice to you in accordance with the relevant program provided by the third-party manager. Your Householder Group Advisor will assist you in selecting third-party investment managers whose investment programs and strategies have been reviewed by Householder Group and determined appropriate for Householder Group's clients based on their individual circumstances and investment goals.

Householder Group's recommendations for third-party managers and programs will be based on research reports and analysis of performance provided by third-party managers and publicly available research and reports regarding investment strategies and programs generally offered by a variety of third-party investment managers. Advisors may utilize computer software programs provided by such third-party managers in providing this service to you.

Service 3: Financial Planning and Consulting Services

Householder Group engages in broad-based, modular, and consultative financial planning. Such advice typically involves providing you a variety of services, principally advisory in nature, regarding the management of your financial resources based upon an analysis of your individual needs. Householder Group may gather required information through in-depth personal interviews between you and your Advisor. Once such information has been studied and analyzed, a written financial plan designed to achieve your expressed financial goals and objectives will be produced and presented to you.

Financial plans are based on your financial situation at the time the plan is presented and on financial information you disclose to Householder Group. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. Householder Group and its Advisors cannot offer any guarantees or promises that your financial goals and objectives will be met. As your financial situation, goals, objectives, or needs change, you must notify your Advisor promptly.

Some clients may only require advice on a single aspect of the management of their financial resources. For these clients, Householder Group offers financial plans in a modular and/or general consulting that address only those specific areas of interest or concern, which may include but are not limited to, tax and budgetary planning, estate, insurance and retirement planning, and business planning.

Householder Group Advisors may provide financial planning services to clients on direct participation programs approved for sale by SSN registered representatives. However, recommendations as to the advisability of purchasing or selling these investments will not be made in the Advisor's capacity as a Householder Group Advisor.

Service 4: Pension Consulting Services

Householder Group provides pension consulting services to employee benefit plans and their fiduciaries based upon an analysis of the needs of the plan. In general, these services may include an existing plan review, asset allocation advice, money management services, communication and education services where Householder Group will assist the plan sponsor in providing meaningful information regarding the retirement plan to its participants, investment performance monitoring, and/or ongoing consulting.

Householder Group may have agreements with third party administrators ("TPAs") to provide these services as part of the TPA's agreement with the plan. In these instances, the TPA may pay a portion of the fee charged to the plan to Householder Group for their services. In other instances, Householder Group may be introduced to a plan through a TPA and will provide service directly to the plan.

Householder Group will hold educational seminars for the plan employees and provide information on the plan specifics and allocation choices. Householder Group Advisors will also meet with individual plan participants and offer personalized information based on their individual objectives.

All client accounts are regulated under the Employee Retirement Income Securities Act ("ERISA"). Householder Group Advisors will provide consulting services to the plan fiduciaries as described above. Typically, the named plan fiduciary must make the ultimate decision pertaining to the services of a such TPAs. TPA referrals may only be made to such administrators that are approved for use by SSN. The plan fiduciary is free to seek independent advice about the appropriateness of any recommended services for the plan.

Service 5: Seminars and Educational Programs

Householder Group conducts seminars and/or educational programs regarding tax planning, estate planning, retirement planning, insurance planning, investment planning, and other related areas of financial planning on a periodic basis.

The information covered in a seminar is not based on the individual needs of the attendees. Householder Group does not provide specific investment advice to attendees unless engaged independently, and only where the attendee's individualized financial information, investment goals, and objectives are provided.

Service 6: Estate Planning Services

Householder Group works with clients to provide estate planning services and works with the client and the client's attorney or other professionals to establish an estate plan strategy that may include the creation of one or more of the following legal documents for the client: wills, trusts, living wills or health directives, power of attorneys.

When working with you and your attorney or other professional, the Householder Group Advisor may:

- a. Consult with you and analyze your financial needs and objectives based upon the information provided; or,
- b. Prepare a written financial plan based upon your identified estate plan needs and objectives; or,
- c. Recommend, as part of your estate plan, investment strategies that the Advisor believes are suited for your identified financial needs and objectives.

All investment analyses and recommendations relating to the preparation of your estate plan will be based upon information you provided to the Advisor. There will be no independent investigation of your background information, nor update of such information, without your express written consent. It remains your responsibility to advise your Advisor and your attorney or other professional of any changes in circumstances, e.g. needs, objectives, goals and any other changes that would impact your estate plan and/or estate distribution.

Item 5 – Fees and Compensation

Service 1: Portfolio Management Services

On an annualized basis, Householder Group charges a negotiable fee up to 2.9% of your assets under management.

The fee third-party managers may charge is a separate advisory fee, which is in addition to Householder Group's advisory fees. Householder Group's advisory fees generally decline incrementally for larger account sizes. The account size and the nature of the services being provided are the primary determinants of the agreed upon fee to be charged. Fees may be negotiable depending on the extent and level of service to be provided. In instances where there is a Joint Advisor Account, the fees will be shared by the Servicing Advisor and the Managing Advisor; in no instance will you pay additional advisory fees for the services of the Managing Advisor.

The fee for portfolio management services is due and payable monthly or quarterly in advance, based on the value of your account at the end of the previous quarter or current quarter, respectively. Fees will be assessed pro rata in the event your agreement is executed at any time other than the first day of a calendar quarter. Householder Group's advisory fees are separate and apart from the fees charged by a third-party manager. Fees paid by a client to third-party managers are established and payable in accordance with the Form ADV Part 2 or other equivalent disclosure document provided by each third-party manager, and may or may not be negotiable.

At its discretion, Householder Group may allow accounts of members of the same household to be aggregated for purposes of determining the advisory fee or meeting the minimum account size. Householder Group may allow such aggregation, for example, where Householder Group services accounts on behalf of minor children of current clients, individual and joint accounts, and other types of related accounts.

Payment of the advisory fees will be made by the qualified custodian holding your funds and securities provided you supply written authorization permitting the fees to be paid directly from your account. Householder Group will not have access to your funds for payment of fees without your written consent. Further, the qualified custodian is responsible for delivering an account statement, at least quarterly, to you directly, showing all disbursements from your account. You are encouraged to review all account statements for accuracy. Householder Group will receive a duplicate copy of your statement. In limited circumstances, you may receive an invoice directly from Householder Group for the payment of its management fees.

If this disclosure brochure, Form ADV Part 2A, is not delivered to you within 48 hours prior to entering into the asset management agreement, you may terminate the asset management agreement within five business days of the date of acceptance without penalty. If you receive the disclosure brochure 48 hours in advance or if the five-day grace period has expired, either party may terminate the agreement upon written notice to the other party. Any pre-paid unearned fees will be refunded to you on a pro rata basis.

Service 2: Financial Planning and Consulting Services

Householder Group charges a fixed fee ranging from \$150 to \$15,000 for broad-based financial planning services, which is negotiable depending on the scope and complexity of the plan, your situation and your objectives. Householder Group requires that the fee is either paid upon signing of a *Client Advisory Services Agreement* or an *Engagement Letter*, or one half of the fee be paid upon signing a *Client Advisory Services Agreement* or an *Engagement Letter*, with the remaining portion due upon completion of the financial plan. Under no circumstance will Householder Group require prepayment of the fee more than six months in advance in excess of \$1,200.

The fee for modular and/or consultative financial planning services is based on a negotiable rate ranging from \$100 - \$1000 per hour, depending on the complexity of your situation. In some circumstances, in lieu of hourly billing, Householder Group may quote a fixed fee based on an estimation of the work involved and time required. You and the Advisor should both be very clear as to the extent of the work to be performed, the fee quoted, as well as the time in which the work is to be completed. All fixed fees and/or hourly work is agreed upon between you and Householder Group Advisor and documented in either Householder Group's *Client Advisory Services Agreement* or *Engagement Letter* which

is executed between the two parties. A copy should be delivered to you immediately upon execution (as well as a copy of Form ADV Part 2A). Fees for modular planning will be paid upon signing of a *Client Advisory Services Agreement* or an *Engagement Letter*, or one-half of the fee be paid upon signing a *Client Advisory Services Agreement* or an *Engagement Letter*, with the remaining portion due upon completion of the modular plan. Fees for consulting services are payable after the completion of the consult.

You may terminate your agreement with Householder Group at any time and a full refund of any fees paid will be made if the engagement is terminated within five (5) business days. If you decide to terminate your agreement after five (5) business days, then any fees paid but not earned will be refunded.

Service 3: Pension Consulting Services

The compensation arrangement for Pension Consulting services will be based on Householder Group's hourly rate and based on the scope and complexity of the qualified plan and the requested services, and which fee will be payable quarterly in advance. An estimate of the total cost will be determined at the start of the advisory relationship. Under no circumstance will Householder Group require prepayment of a fee more than six months in advance and in excess of \$1,200.

All client accounts are regulated under ERISA. Householder Group will provide consulting services to the plan fiduciaries as described above. Typically, the named plan fiduciary must make the ultimate decision as to retaining the services of such investment advisors as Householder Group recommends. The plan fiduciary is free to seek independent advice about the appropriateness of any recommended services for the plan.

If the disclosure brochure, Form ADV Part 2A, is not delivered to the client within 48 hours prior to the client entering into the pension consulting agreement, the client may terminate the agreement within five (5) business days of the date of acceptance without penalty. If the client received the disclosure documents 48 hours in advance or if the five-day grace period has expired, either party may terminate the agreement upon written notice to the other party. The pension consulting fees will be pro-rated for the quarter in which the cancellation notice was given and unearned fees will be refunded to the client.

Service 4: Seminars and Educational Programs

Seminars are generally complimentary for Householder Group's existing clients; however, in some circumstances, Householder Group may charge non-client attendees a fee for these seminars. In such cases the fees are up to \$500 per person, depending upon the materials used and the type of seminar conducted, and is generally payable at the time of the seminar.

Educational programs are generally more interactive and may be conducted over several days. Program fees are dependent on the length and complexity of the program. Costs for participants may range up to \$1,000. The program fee may or may not include materials.

Service 5: Estate Planning Services

The negotiable fees for the estate planning services will generally range from \$700 to \$2,000 depending on the complexity of your situation, number of meetings, travel time, and time involved in implementation. Fees are negotiable. Generally, fees will be due upon signing of a *Client Advisory Services Agreement* or an *Engagement Letter*, or one-half of the fee shall be paid upon signing a *Client Advisory Services Agreement* or an *Engagement Letter*, with the remaining portion due upon completion of services. However, Householder Group will work with you to determine a suitable fee and payment schedule.

You may terminate your agreement with Householder Group within five (5) business days after execution of the agreement with Householder Group without penalty. Any deposit you paid to Householder Group will be refunded to you in full. After the five-day period, you may terminate at any time prior to completion of the services upon written notice to Householder Group. Any refund you are due will be calculated based on the time expended by Householder Group

multiplied by the hourly rate of \$250 per hour and subtracted from the deposit paid to Householder Group.

General Information on Services and Fees

Householder Group's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which you will incur. You may incur certain charges imposed by custodians, brokers, third party investment advisors and other third parties such as fees charged by managers, custodial fees, ticket charges, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Your Advisor may choose to pay broker-dealer ticket charges; however, you are always responsible for additional transaction charges. If the Advisor does not pay ticket charges, this may result in a higher overall cost to you.

You will pay separately for Individual Retirement Account custodial services and may be assessed inactivity fees. All fees paid to Householder Group for investment advisor services are separate from fees and expenses charged to owners of mutual fund shares or variable annuity contracts by the product sponsors. As a result, you may pay two management fees. Variable Annuities often carry higher internal expense ratios than mutual fund investments due to their insurance related features. If you opt for management of a variable annuity, you will be subject to higher annual fees than if only invested in the variable annuity, as fees paid to Householder Group are separate and segregate from the annuity expenses. Furthermore, you will have the same investment options and could possibly invest in a similar fashion without management services on your own. You are not obligated to use your Advisor for any of the products or services referenced in this Brochure. Lower fees for comparable services may be available from other sources. A complete explanation of the product-related fees and expenses is contained in the prospectus for the particular investment product.

Mutual funds and ETFs also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Householder Group's fee, and Householder Group shall not receive any portion of these commissions, fees, and costs. For Joint Advisor Accounts, the fees will be shared by the Servicing Advisor and the Managing Advisor; in no instance will the client pay additional advisory fees for the services of the Managing Advisor.

Householder Advisors in their capacity as a broker-dealer registered representative may, from time-to-time, receive 12b-1 fees or trail commissions from investment companies in connection with the placement of client funds into investment companies. Item 12 further describes the factors that Householder Group considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

These practices present a conflict of interest and could potentially give Householder Group or your Advisor an incentive to recommend investment products based on the compensation received, rather than on your needs. These conflicts, which are disclosed in this Brochure, are addressed through ongoing training, annual compliance meetings, and routine review of transactions by either Householder Group's Chief Compliance Officer or Compliance staff.

In the event that a Householder Group Advisor is to receive commission revenues from you in connection with investments purchased in advisory or managed accounts, such commissions shall be "fully disclosed" by the Advisor, and/or product prospectus and/or through the distribution of the trade confirmation statement. If as a registered representative, an Advisor earns a commission on the sale of a securities product, he or she must wait one (1) year before including that position in the calculation of your advisory fee. Advisory fees may not be reduced to offset these commissions. Illiquid assets (e.g. partnerships, illiquid REITs, savings accounts, CD's) are not included in the calculation of assets under management and advisory fees. In some instances, lower fees for comparable services may be available from other sources.

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

Householder Group does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Householder Group's clients include individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. The Householder Modelfolios require a \$50,000 minimum investment per portfolio.

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

Householder Group Advisors offers advice on all exchange-listed securities and those traded over-the-counter. Advice is also offered on: variable annuities, variable life insurance, mutual funds, U.S. government securities, corporate debt instruments, certificates of deposit, municipal securities, security and index option contracts, and any other products that would be appropriate for the individual client, provided such products are approved for offering by SSN.

In formulating investment advice or managing assets to accomplish stated financial objectives, Householder Group Advisors may use one or more of the following methods of analysis:

- Fundamental – Analyzes individual investments in relation to expectations regarding the market and international and national economic indicators, such as GDP growth rates, inflation, interest rates, exchange rates, productivity, and energy prices.
- Technical – Analyzes past market data trends, primarily price and volume, in an attempt to forecast the direction of securities prices.
- Cyclical – Analyzes past economic and market cycles in an attempt to forecast the direction of securities prices.
- Computer model – Software programs utilizing statistics and probability, calculus, and econometrics to produce trading signals for the purpose of timing portfolio re-allocations.

Advisors may use one or more of the following investment strategies in managing client assets:

- Buy and hold (passive management) - A long-term investment strategy based on the view that in the long run financial markets give a good rate of return despite periods of volatility or decline. This viewpoint also holds that short-term market timing, *i.e.* the concept that one can enter the market on the lows and sell on the highs, does not work so it is better to simply buy and hold.
- Market timing (active management) - A strategy of making buy or sell decisions of financial assets by attempting to predict future market price movements. The prediction may be based on an outlook of market or economic conditions resulting from technical or fundamental analysis. This is an investment strategy based on the outlook for an aggregate market, rather than for a particular financial asset.
- Momentum investing (active management) – A strategy of buying securities that have had high returns over a specific historical time period (ex. the twelve months), and selling those that have had poor returns over the same period.
- Strategic asset allocation - A strategy that involves the establishment of a long-term target allocation in major asset classes such as stocks, bonds, and cash based on portfolio objective, risk tolerance, and time horizon.
- Tactical asset allocation – A strategy that attempts to overweigh those asset classes that are expected to outperform on a relative basis and under weigh those expected to underperform. Financial and economic variables ("signals") are used to predict performance and assign relative short-term asset-class weightings.

The strategies described above may utilize a combination of long term purchases (securities held at least a year), short-term purchases (securities sold within a year), trading (securities sold within 30 days), or options contracts (non-discretionary only and limited to purchases of put options where the account is long the underlying security & writing covered calls). Frequent trading in a client account can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investment strategies and recommendations may be based upon consideration of any of the following:

- a. Diversification – for the purpose of balancing risk while maintaining the possibility of gain; or,
- b. Risk Factors – including the risk of capital loss (market risk) and the risk of loss of purchasing power (inflation

- risk), and the client's understanding of, and financial ability to bear, such risks; or,
- c. Asset Balance – taking into consideration short and long-term liquidity needs, blending of lesser and greater risk approaches, and combining income, growth, and safety concepts; or,
 - d. Discipline – emphasizing commitment and follow through over a reasonable period of time in order to permit the investment plan or recommendations to achieve the intended/pursued result; or,
 - e. Income Tax Considerations, but these should not replace the economic benefits as the principal determinant of investment decisions.

Investing in securities involves risk of loss that you should be prepared to bear. Risks associated with the strategies described above include:

- Capital risk – The risk that your investments may lose value.
- Currency risk – If the assets you invest in are held in another currency there is a risk that currency movements alone may affect the value.
- Financial risk – The risk that there may be a disruption in the internal financial affairs of the investment, thereby causing a loss of value.
- Market risk – The risk that the value of a security or portfolio will decrease due to the change in value of the overall market.
- Credit risk – The risk of loss arising from a borrower who does not make payments as promised.
- Interest rate risk – The risk that an interest-bearing asset, such as a bond, will lose value due to variability of interest rates. In general, as rates rise, the price of a fixed rate bond will fall, and vice versa.

To aid in mitigating some of the risk associated with investing in securities, Householder Group prohibits its Advisors from offering advice on securities products that have not been approved by the broker/dealer SSN. Some of these securities products may include futures contracts, private placements and Regulation D offerings. Similarly, Advisors are not permitted to offer advice on products in instances where they are not properly licensed. For example, an Advisor who is only Series 6 licensed cannot advise clients to purchase stocks, bonds, options, REITs.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Householder Group or the integrity of Householder Group's management. Householder Group has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

The principal business of Householder Group is the provision of advisory services. Householder Group's Chief Executive Officer, Scott Householder, and its Advisors are registered representatives of SSN, a FINRA licensed broker-dealer firm. In addition, a number of Householder Group Advisors carry the requisite licensing to allow them to act as insurance salespersons. Accordingly, these individuals are licensed to sell securities and insurance related products for separate commission based compensation.

In addition, a number of Householder Group Advisors are also accountants or lawyers. Therefore, you may be offered services (such as accounting or legal advice) for a fee. You are under no obligation to purchase these services through your advisor. Because of the conflict of interest in having you purchase services through them, this disclosure is provided to you.

From time-to-time, Advisors who are registered representatives may receive 12b-1 fees from investment companies in connection with the placement of client funds into investment companies. Additionally, Householder Group or its Advisors may receive administrative, investment advisory or other fees for providing support services, administrative support and/or client referrals to other investment advisory firms. These practices present a conflict of interest and may give Householder Group or a client's Advisor an incentive to recommend products based on the compensation received, rather than on a client's needs. In all such cases, these arrangements are fully disclosed to the affected client(s). Clients are

not obligated to use their Advisor for any of the products or services referenced in this Brochure. Lower fees for comparable services may be available from other sources.

All compensation received by Householder Group Advisors for securities transactions through SSN will be separate, yet customary for effecting the services and transactions, including 12b-1 fees for the sale of investment company products. Advisors may make differing recommendations with respect to the same securities or insurance products to different advisory clients. All recommendations made are specific to each client's individualized needs and current financial situation.

Householder Group strongly encourages you to carefully read prospectuses and consider the investment objectives, risks and charges and expenses of the investment company, prior to investing. The contract prospectus and the underlying fund prospectus contain this and other information about the investment company.

The conflicts described here are addressed through ongoing training, annual compliance meetings, and through routine transaction review by either Householder Group's Chief Compliance Officer or Compliance staff.

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

Householder Group has adopted a Code of Ethics for all supervised persons of the firm, including Advisors, describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of non-public client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Householder Group must acknowledge the terms of the Code of Ethics annually, or as amended.

Householder Group anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Householder Group has management authority to effect the purchase or sale of securities in which Householder Group, its affiliates and/or clients, directly or indirectly, have a position of interest. Householder Group's employees and persons associated with Householder Group are required to follow Householder Group's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Householder Group and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Householder Group's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Householder Group will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Householder Group's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between Householder Group and its clients. The conflicts, which are disclosed in this Brochure, are addressed through ongoing training, annual compliance meetings, and routine review of transactions by either Householder Group's Chief Compliance Officer or Compliance staff.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Householder Group's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Householder Group will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

It is Householder Group's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Householder Group will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an advisor, acting as principal for its own account or the account of an affiliated broker-

dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment advisor in relation to a transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, acts as the broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an advisor is dually registered as a broker-dealer or has an affiliated broker-dealer.

Householder Group's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting our Compliance staff at 602-604-0700.

Item 12 – Brokerage Practices

Householder Group will recommend SSN, in its capacity as a broker-dealer, to clients in need of brokerage and/or custodial services. SSN is a fully disclosed introducing broker-dealer who clears transactions for Householder Group advisory clients through National Financial Services, LLC (a wholly owned subsidiary of the Fidelity Investments Group of companies, located in Boston, Massachusetts).

Although you are not required to select SSN and its clearing broker-dealer NFS for execution and custodial services, Householder Group does not allow clients to participate in its investment advisory services if they select another broker-dealer. Householder Group does not have discretion to select the broker-dealer to use for transactions or to negotiate transaction costs. Transactions executed through SSN, in its broker-dealer capacity, as part of services identified in this Brochure, may be subject to SSN's then current transaction fee and commission schedule. If applicable, such commissions and fees will be "fully disclosed". These practices present a conflict of interest and may give Householder Group or your Advisor an incentive to recommend products based on the compensation received, rather than on your needs.

Due to Householder Group's business model, Householder Group's practice does not include negotiating commissions with broker-dealers or obtaining volume discounts. To improve the quality of execution, Householder Group Advisors may aggregate your transactions with other orders for his or her clients. Allocations of aggregated orders are made under procedures designed to treat all clients fairly. Aggregation of transactions typically occurs only when an Advisor is executing a transaction in the same investment in multiple client accounts. If transactions are not aggregated, this may result in higher costs to clients than if transactions are aggregated.

Not all advisory firms require their clients to direct brokerage to a specified broker-dealer. Accordingly, the investment advisory services provided by Householder Group may cost clients more or less than purchasing similar services separately. You should consider whether or not the appointment of SSN as the sole broker-dealer may or may not result in certain costs or disadvantages to you as a result of possibly less favorable executions. Factors to consider include the type and size of the account, the securities to be bought or sold and your historical and/or expected size or number of trades.

Additionally, vendors and product sponsors such as variable and investment companies which are recommended to you may provide support to Householder Group and Advisory Representatives. Such support includes research, educational information and monetary support for due diligence trips and client events.

Item 13 – Review of Accounts

Householder Group Advisors perform account reviews on a periodic basis, such as quarterly or semi-annually, but typically no less than annually. Your Advisors will review your investments as well as your changing needs and objectives. In general, the frequency and extensiveness of the review is set between you and your Advisor based upon your preferences and the specific requirements of managing your portfolio and your personal needs. This said, reviews may also occur when you inform your Advisor of substantial changes to your financial or tax status, investment objectives, risk tolerance or time horizons. Finally, reviews may occur when fundamental market factors (e.g., inflation rates, interest

rates, GDP, etc.) change in a material way.

You will receive regular statements, at least quarterly, concerning your investments directly from the qualified custodian holding your assets. In some instances, and depending on the advisory program selected, you may receive additional "special" performance reporting provided to you on a quarterly basis detailing performance and comparative data. From time to time, and at the request of your Advisor, you may receive a consolidated report generated by Householder Group to help facilitate the portfolio review process between you and your Advisor.

With respect to third-party managed accounts, Householder Group Advisors will review the services, reporting and account data provided by the approved third-party investment advisors to you to ensure consistency with fair and ethical practices. Generally, quarterly and year-end reports will be prepared for each client by third-party investment managers. These reports will not be prepared by Householder Group. The nature and frequency of the reports will vary depending upon the third-party manager being utilized. You should refer to the third-party investment manager's Form ADV Part 2A for more information.

Some Advisors may generate account statements or performance reports for clients. You are urged to compare the account statements from the custodian with those from the Advisor. In some instances, Advisor statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 14 – Client Referrals and Other Compensation

For information regarding client referrals and other compensation, please refer to Item 5 and Item 10.

Item 15 – Custody

Householder Group may deduct fees directly from your accounts but does not otherwise have custody of your funds or securities.

Deduction of advisory fees will be made by the qualified custodian holding your funds and securities. Further, the qualified custodian is responsible for delivering a monthly or quarterly account statement directly to you, and never through Householder Group, showing all disbursements from the account. You are encouraged to review all account statements for accuracy. Householder Group will receive a duplicate copy of the statement that was delivered to you in order to form a reasonable belief that such statements are being delivered. You may terminate authorization for automatic fee deduction of advisory fees by notifying your Advisor in writing. In turn, the Advisor will notify the Householder Group Corporate office promptly.

Item 16 – Investment Discretion

Select Householder Group Advisors have been given approval from the Householder Group's Chief Compliance Officer to manage accounts on a discretionary basis. This means that he/she does not need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts.

If you decide to grant your Advisor discretionary authority, you may do so at the outset of the advisory relationship by executing a Client Service Agreement. In such instances, you are granting your Advisor complete discretion to determine the selection and amount of securities to be bought or sold. While exercising discretionary authority, the Advisor must exercise such discretion in a manner consistent with the stated investment objectives for your account.

You may set limitations and restrictions on the discretionary authority you grant to your Advisor. If applicable, limitations are included in the initial written authority. However, you may amend any limitation as necessary. All Investment guidelines, limitations and restrictions must be provided to Householder Group Advisors in writing.

Your advisor may have the Householder Group Corporate Office trade in your discretionary Householder Model portfolio on their behalf. Although the trades are performed by a Corporate Office licensed representative, your Advisor is your primary representative and point of contact. He/she delegates the trading function, based upon the Athena Signals received, to the Corporate Office.

With respect to third-party managed accounts only, neither Householder Group nor any related person has the authority to determine, without first obtaining your specific consent, the securities to be bought or sold, the amount of the securities to be bought or sold, or the broker-dealer to be used for the purchase or sale of securities. Instead, these decisions shall be made according to the terms of the investment advisory agreement executed by you and your chosen third-party investment manager. Your chosen third-party investment manager may have discretionary authority in your account. You should refer to the third-party investment manager's Form ADV Part 2A for more information.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Householder Group does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Householder Group and Advisors may not provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

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