

Firm Brochure

(Part 2A of Form ADV)

InSight Employee Benefit Communications, Inc.

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This brochure provides information about the qualifications and business practices of InSight Employee Benefit Communications, Inc. (InSight EBC). If you have any questions about the contents of this brochure, please contact us at: (720) 228-4157, or by email at: contactus@insightebc.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

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

September 1, 2011

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (720) 228-4157 or by email at: contactus@insightebc.com.

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Advisory Business

Firm Description

InSight Employee Benefit Communications was founded in 2006 as a division of Innovest Portfolio Solutions LLC. The firm was incorporated in the state of Colorado and became a separate company, InSight Employee Benefit Communications, Inc. ("InSight EBC"), no longer affiliated with Innovest Portfolio Solutions LLC, in 2010.

InSight EBC provides retirement savings and investment education services through group workshops, along with individual counseling and investment advisory services to retirement plan participants of governmental and corporate pension and profit sharing retirement plans. Additionally, InSight EBC provides investment consulting and advisory services to governmental and corporate pension and profit sharing retirement plan sponsors, along with defined contribution retirement plan consulting services to investment managers, record-keepers and custodians. Advice to retirement plan participants is provided through consultation with the participants and may include: determination of financial objectives, identification of time horizon and risk tolerance, cash flow management, tax planning, investment management, and retirement planning.

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

InSight EBC does not act as a custodian of client assets. The client always maintains asset control. InSight EBC does not place trades for clients under a limited power of attorney.

When retained to provide individual counseling and advice services participants may, at their discretion, utilize such services. As part of these services, an evaluation of the participant's initial situation, including time horizon, risk tolerance, retirement income objectives and funding requirements is created by an InSight EBC representative. Periodic reviews are also encouraged to provide reminders of the specific courses of action that need to be taken and review the progress concerning the achievement of stated objectives. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

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

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

Principal Owners

Richard Rodgers is a 100% stockholder.

Types of Advisory Services

In addition to educational group workshops, the retirement plan sponsor may engage InSight EBC to provide an individual counseling program that will facilitate 30-minute, 45-minute, or 60-minute individual counseling sessions for retirement plan participants. During such sessions InSight EBC representatives shall assist individual retirement plan participants with information about the plan's investment alternatives and provide personalized guidance with the allocation of investments within the plan's core/primary investment options, considering each Plan participant's investment goals, time horizon, risk tolerance, limitations and other relevant financial circumstances concerning retirement savings.

Investment advice offered to retirement plan participants is limited to only investment options and professionally-managed portfolios offered through the plan's core/primary investments. The recommended allocation among investment options or professionally-managed portfolios offered through the Plan may be adjusted in consideration of other investments held separately from (outside) the plan, which are specifically intended for long-term retirement savings purposes. However, these separately held investments must be widely traded and invested in an easily identifiable asset class.

InSight EBC provides investment advice through consultations. InSight EBC does not provide investment supervisory services, also known as asset management services; manage investment advisory accounts not involving investment supervisory services; or issue periodicals about securities by subscription.

On more than an occasional basis, InSight EBC may furnish advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and retirement plan administrative expenses.

As of January 1, 2012, InSight EBC provided individual counseling and investment advice services to 2,150 participants of 20 governmental and corporate retirement plans with approximately \$271 million in total retirement plan assets. None of the assets are managed on a discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created retirement plan sponsor clients that reflect the stated goals and objective.

Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Retirement Plan Participant Education, Investment Counseling and Investment Advisory Agreement

This arrangement includes services that provide participant education and counseling services to active and inactive participants of a governmental or corporate pension and/or profit sharing retirement plan. The retirement plan sponsor may engage InSight to advise, consult with, and assist the retirement plan participants in all aspects of their retirement plan investments, investment allocations, investment education, and individual investment consulting matters.

The scope of services provided under this agreement shall be determined by the retirement plan sponsor. The services provided may include, but are not limited to the following:

Analysis and Planning: InSight EBC will conduct a study and provide an analysis of Plan participant demographics, behavior, worksites, departments, shifts, and Plan objectives. Upon completion of the analysis InSight EBC will present to the Trustees, Plan Committee or designated authorized Plan representatives, an Annual Participant Education Plan, which will provide a proposed strategy of Plan participant investment education, investment advice and individual investment consulting services for discussion and approval. This Annual Participant Education Plan will include a description of recommended services to be provided by InSight, estimated cost of such services, and a timeline for completion of the proposed participant education, counseling and investment advisory services.

On-Site Group Presentation Services: The retirement plan sponsor may engage InSight EBC to provide group meetings and educational workshops with all departments and shifts within the plan's departments. InSight EBC offers several different presentations that cover multiple topics related to retirement planning and investing.

Detailed investment advice and specific recommendations may be provided as part of individual counseling services. Implementation of the recommendations is at the discretion of the participant.

The fee for Retirement Plan Participant Education, Investment Counseling and Investment Advisory services is based upon the scope of the engagement. Fees for these services are billed at a flat daily or hourly rate. The minimum fee is \$1,800 per day, \$1,000 per half-day or \$275 per hour and is negotiable. Since retirement plan education and individual counseling is a

discovery process, situations occur wherein the client is unaware of certain predicaments.

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

Plan Administration, Management and Participant Education and Advisory Services Agreement

The scope of work and fee for a Plan Administration, Management and Participant Education and Advisory Services Agreement is provided to the client in writing prior to the start of the relationship. A Plan Administration, Management and Participant Education and Advisory Services Agreement may include, but not be limited to, the following two groups of services:

Plan Administration and Management Services: Board of Trustees (fiduciary) Governance, retirement plan documentation review and revisions, retirement plan operation and process, day-to-day retirement plan administration, proxy and legal notice processing, facilitation of compliance with regulatory requirements and annual plan audits.

Participant Investment Education and Advisory Services: Analysis and planning, implementation and written strategic plan, individual counseling and investment advice, and development and maintenance of collateral and electronic retirement plan education material.

The annual Plan Administration, Management and Participant Education and Advisory Services Agreement fee is based on a percentage of the retirement plan assets according to the following schedule:

0.1925% on the first \$100,000,000;

0.0750% on the next \$100,000,000 (from 100,000,001 to 200,000,000);
and

0.0375% on the assets above \$200,000,000.

The minimum annual fee is \$25,000 annually and is negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

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

Retainer Agreement

In some circumstances, a Retainer Agreement is executed in lieu of a Retirement Plan Participant Education, Investment Counseling and Investment Advisory or Plan Administration, Management and Participant Education and Advisory Services Advisory Service Agreement when it is more appropriate to work on a fixed-fee basis. The fee for a Retainer Agreement is based upon the scope of work provided and is negotiable.

Hourly Engagements

InSight EBC provides hourly services for clients who need advice or other services on a limited scope of work. The hourly rate for limited scope engagements is \$275.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying InSight EBC in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, InSight EBC will refund any unearned portion of the advance payment. Some negotiated agreements have a minimum period of time (such as one year or three years) before a client may terminate.

InSight EBC may terminate any of the aforementioned agreements at any time by notifying the client in writing at least 30 days in advance. If the client made an advance payment, InSight EBC will refund any unearned portion of the advance payment.

Fees and Compensation

Description

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

Some Retainer Agreements may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Fees are negotiable.

Fee Billing

Fees for Retirement Plan Participant Education, Investment Counseling and Investment Advisory services, and services provided through a Retainer Agreement are billed monthly or quarterly, in advance or arrears, meaning that we may invoice you before or after the monthly or three-month billing period has begun or ended. Fees for Plan Administration, Management and Participant Education and Advisory Services are billed quarterly, in advance,

meaning that we invoice you before the three-month billing period has begun. Payment in full is expected upon invoice presentation. The plan sponsor must consent in advance to direct debiting of their retirement plan's fee account.

Fees for projects are billed 50% in advance, with the balance due upon completion of the project.

Other Fees

InSight EBC may also charge reasonable and customary travel expenses associated with the delivery of services provided within the scope of the agreement.

InSight EBC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, negotiations with clients, etc.).

Expense Ratios

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

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

Past Due Accounts and Termination of Agreement

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

Performance-Based Fees

Sharing of Capital Gains

InSight EBC does NOT use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

InSight EBC generally provides investment advice to retirement plan participants, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

InSight EBC does not impose a minimum account size when engaged to provide Retirement Plan Participant Education, Investment Counseling and Investment Advisory services or retainer services. The minimum annual fee when engaged with a Plan Administration, Management and Participant Education and Advisory Services Agreement is \$25,000.

InSight EBC has the discretion to waive the minimum fee. Other exceptions will apply to employees of InSight EBC and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

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

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

Other sources of information that InSight EBC may use include Morningstar Principia mutual fund information, Morningstar Principia stock information, Standard & Poor's, Bloomberg, fi360 Toolkit, and the World Wide Web.

Investment Strategies

Investment advice offered to retirement plan participants is limited to only investment options and professionally-managed portfolios offered through the plan's core/primary investments. These investment options are limited to those included in the plan sponsor's Investment Policy Statement. The recommended allocation among investment options or professionally-managed portfolios offered through the Plan may be adjusted in consideration of other investments held separately from (outside) the plan, which are specifically intended for long-term retirement savings purposes. However,

these separately held investments must be widely traded and invested in an easily identifiable asset class.

Investment advice is based upon widely accepted methodology (Modern Portfolio Theory), in consideration of the participant's risk tolerance, time horizon, diversification of assets, and other relevant information provided by the participant.

Risk of Loss

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

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

- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

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

Other Financial Industry Activities and Affiliations

Financial Industry Activities

InSight EBC is registered as a Registered Investment Adviser. InSight EBC's principal, Richard Rodgers, is a Registered Investment Adviser Representative. Registration does not imply a certain level of skill or training.

Affiliations

InSight EBC does NOT have arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships (*name each as applicable*).

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

Code of Ethics

The employees of InSight EBC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

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

Personal Trading

The Chief Compliance Officer of InSight EBC is Richard Rodgers. He reviews all employee trades each quarter. His trades are reviewed by the firm's general counsel. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

InSight EBC does NOT have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. InSight EBC recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

InSight EBC recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab Trust Company.

InSight EBC does NOT receive fees or commissions from any of these arrangements.

Best Execution

InSight EBC reviews the execution of mutual fund trades at each custodian each quarter, through the retirement plan's recordkeeping provider. The review is documented in the InSight EBC *Compliance Manual*. Trading fees charged by the custodians is also reviewed on a quarterly basis. InSight EBC does not receive any portion of the trading fees.

Soft Dollars

InSight EBC does NOT receive a software maintenance credit or other soft dollar compensation from any trust company, custodian, mutual fund company, insurance company or other financial services company.

Order Aggregation

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

Review of Accounts

Periodic Reviews

InSight EBC encourages retirement plan participants to meet with an InSight EBC representative at least annually for an account review. More frequent account reviews are encouraged when market conditions dictate.

Review Triggers

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

Regular Reports

Retirement plan participants receive regular reports from the retirement plan's recordkeeping provider.

Client Referrals and Other Compensation

Incoming Referrals

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

Referrals Out

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

Other Compensation

InSight EBC does NOT receive other compensation from any trust companies, custodians, recordkeeping firms, mutual fund companies, insurance companies, banks or other financial services companies.

Custody

Account Statements

All assets are held at qualified custodians, which means the custodians or retirement plan recordkeeping firms provide account statements directly to retirement plan participants at their address of record or email address of record at least quarterly.

Performance Reports

Retirement plan participants are urged to compare the account statements received directly from their custodians or the retirement plan's recordkeeping firm to any performance report statements that may be provided by InSight EBC.

Net Worth Statements

Investment advice offered to retirement plan participants is limited to only investment options and professionally-managed portfolios offered through the plan's core/primary investments. These investment options are limited to those included in the plan sponsor's Investment Policy Statement. InSight EBC does not engage in holistic financial planning; therefore, net worth statements are not provided to retirement plan participants.

Investment Discretion

Discretionary Authority for Trading

InSight EBC does NOT accept discretionary authority to manage securities accounts on behalf of clients or retirement plan participants.

Limited Power of Attorney

InSight EBC does NOT accept engagements inclusive of a limited power of attorney agreement.

Voting Client Securities

Proxy Votes

InSight EBC does NOT vote proxies on securities. Retirement plan participants and plan sponsors are expected to vote their own proxies.

When assistance on voting proxies is requested, InSight EBC will provide recommendations to the retirement plan participant or plan sponsor.

Financial Information

Financial Condition

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

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

Business Continuity Plan

General

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

Disasters

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

Alternate Offices

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

Loss of Key Personnel

InSight EBC has a Buy/Sell Agreement with Michael Taylor to support InSight EBC in the event of Richard Rodgers' serious disability or death.

Information Security Program

Information Security

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

Privacy Notice

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

The categories of nonpublic information that we collect from retirement plan participants may include information about their personal finances, information about their health to the extent that it is needed for the retirement planning process, and information about transactions between retirement plan participants and third parties. We use this information to help retirement plan participants meet their personal financial goals.

With permission from the retirement plan participant, we disclose limited information to attorneys, accountants, and mortgage lenders with whom they have established a relationship.

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

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

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

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

Brochure Supplement (Part 2B of Form ADV)

For: Richard Rodgers, a supervised person of:

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This brochure supplement provides information about Richard Rodgers that supplements the InSight Employee Benefit Communications, Inc. brochure. You should have received a copy of that brochure. Please contact us at (720) 228-4157 or by e-mail at contactus@InSightEBC.com if you did not receive InSight Employee Benefit Communication's brochure or if you have any questions about the contents of this supplement.

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

January 1, 2012

Education and Business Standards

InSight EBC requires that advisors in its employ have a bachelor's degree or at least four years qualified professional industry experience and further coursework demonstrating knowledge of retirement planning and investment management. Examples of acceptable coursework include: an MBA, AIF®, AIFA®, CFP®, CFA, CRC®, CRA®, JD, CEBS, or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for retirement planning and investment management.

Professional Certifications

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

Accredited Investment Fiduciary Analyst (AIFA®): Accredited Investment Fiduciary Analysts are the few people in the country with knowledge in both a prudent investment process and assessment principles. AIFA designees' primary function is to perform assessments of an Investment Steward's, Advisor's, or Manager's conformance to a Global Fiduciary Standard of Excellence. Accredited Investment Fiduciary Analysts also perform CEFEX Fiduciary Certifications and are licensed through the Center for Fiduciary Studies, a Fiduciary 360 company, and authorize use of the AIFA® mark. AIFA® certification requirements:

- Receive formal training in investment fiduciary responsibility, including Practices and the legal and best practice framework they are built upon.
- Successful completion of the AIFA® Certification Exam.
- Agree to adhere to and sign the AIFA® Designee Code of Ethics policy.
- Accrue at least ten hours of annual continuing professional education with at least four hours provided directly through Fiduciary 360.

Accredited Investment Fiduciary (AIF®): Accredited Investment Fiduciaries are licensed through the Center for Fiduciary Studies, a Fiduciary 360 company, and authorize use of the AIF® mark. AIF® certification requirements:

- Receive formal training in investment fiduciary responsibility, including Practices and the legal and best practice framework they are built upon.
- Successful completion of the AIF® Certification Exam.
- Agree to adhere to and sign the AIF® Designee Code of Ethics policy.
- Accrue at least six hours of annual continuing professional education with at least four hours provided directly through Fiduciary 360.

Richard Rodgers, AIF®

Background:

- Date of birth: October 29, 1964
- Accredited Investment Fiduciary (AIF®), FINRA Series 65 (Registered Investment Adviser Representative).

Business Experience (preceding five years):

- January 2010 – Present
Principal, InSight Employee Benefit Communications, Inc.
- February 2006 – December 2009
Principal, InSight Employee Benefit Communications division of Innovest Portfolio Solutions LLC

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Richard Rodgers' activities are documented through our client relationship management system.

Richard Rodgers' contact information:

(720) 228-4157 rickr@insightebc.com