

## Item 1 Cover Page

Part 2A of Form ADV

Firm Brochure

RH Financial Group, LLC

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Oakbrook, IL 60523

Phone: (630) 333-9207

Date: May 20, 2013

This brochure provides information about the qualifications and business practices of RH Financial Group, LLC. If you have any questions about the contents of this brochure, please contact us at (630) 333-9207 or via email at [info@rhfinancialgroup.com](mailto:info@rhfinancialgroup.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 RH Financial Group, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Please note that registration as an investment advisory firm does not imply a certain level of skill or training.

## **Item 2      Material Changes**

We have amended and clarified some of our services and fees in this brochure. We are no longer charging hourly fees.

## **Item 3      Table of Contents**

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## Item 4      **Advisory Business**

### About the Firm

RH Financial Group, LLC is an investment advisory firm located in Oakbrook, IL. Our owners are Charles Rizzo and Gina Hornbogen. We offer a variety of advisory services described in more detail within this document. As of 12-31-2012 our discretionary assets under management were \$76,097,734.

### Description of Advisory Services

Our services include:

1. Discretionary and non-discretionary investment management services;
2. Retirement plan services;
3. Ancillary Services – Tracking and Reporting Services;
4. Personal Financial Management Services; and
5. Financial planning services .

The services available under each category may, depending upon your needs and circumstances, be offered according to different formats and levels of complexity.

#### ***1. Investment Management Services***

Investment management services are offered either on a discretionary or non-discretionary basis.

For discretionary accounts, you authorize us to make, order and direct any and all transactions involving the assets managed in your name and for your account with the same authority you would have if you were managing your own assets. However, we will not have the authority to withdraw your funds with the exception of withdrawing fees as authorized by you.

For non-discretionary accounts, no trades will be placed without prior approval from you. If you choose to have accounts managed on a non-discretionary basis, you are advised that such accounts are subject to certain risks. Risks may include but not be limited to the risk of missing market opportunities or the risk that we will be unable to effect timely changes in market positions as a result of not being able to obtain your authorization.

We will work closely with the client to determine your investment objectives and risk tolerance. We use an Investor Profile Questionnaire to help determine your investment objectives and risk tolerance level. From this information, we will recommend one or more investment strategies, which are described below. You may impose restrictions on the securities or types of securities we invest in for your account. You retain ownership of all securities.

#### **A. RH Financial Portfolio Services**

Through the RH Financial Portfolio Services we offer investment portfolios called RH Financial Portfolios. The Advisory Representative will work with you to select one or more portfolios that fit your investment objectives and risk tolerance. The RH Financial Portfolios are designed to provide risk-adjusted returns through the use of a proprietary strategic asset allocation investment approach ranging from 0% equity to 97% equity.

Each Portfolio was designed using a proprietary set of investment models, which are comprised of mutual funds,

exchange traded funds and bonds and are designed to provide an efficiently-managed portfolio. RH Financial Portfolios are designed with a particular equity to fixed income ratio. Periodic client meetings, updates to the Investor Profile Questionnaire, and evaluation of current market conditions will help to ensure that the selected RH Financial Portfolios reasonably match your investment objectives. RH Financial Portfolios are available through the Applicant's Advisory Representatives. These services are offered on a discretionary basis only.

#### **B. RH Financial Portfolio Services – Tri-Party Platform**

The Tri-Party Platform is offered to clients of other investment advisers who have partnered with us. The Tri-Party Platform offers you selected RH Financial Portfolios with a composition of 50% or more in equity investments. RH Financial Group, LLC, the other adviser, and the client enter into a tri-party advisory agreement that details the roles and responsibilities of the other adviser and us. In general, we are responsible for managing the your assets in accordance with the RH Financial Portfolios and the other adviser, as the main client contact, is responsible for gathering information related to your investment objectives, time horizon and risk tolerance and working with you to select the appropriate RH Financial Portfolio for your objectives and risk tolerance. The other advisor is also responsible for periodic meetings, updates to the Investor Profile Questionnaire, and evaluation of current market conditions will help to ensure that the selected RH Financial Portfolios reasonably match your investment objectives. These services are only offered on a discretionary basis

#### **C. Directly Managed Accounts**

Our Advisory Representatives also offer you individually tailored investment management accounts. The Advisory Representative will allocate and periodically reallocate (or recommend the allocation or reallocation of) your assets among various securities and/or investment vehicles, including: stocks, bonds, mutual funds, exchange traded funds and private placements. These services may be offered on a discretionary or non-discretionary basis.

### **2. Retirement Plan Services**

We provide advisory services to employer sponsored retirement plans, including pension and profit sharing plans (the "Plans"). Through written agreements with Plans, we offer a package of consulting services including core investment recommendations and model portfolio options. The core investment options generally include up to ten individual mutual funds ("Core Investments") selected exclusively from mutual funds that are made available on the platform of the Plan's custodian at the sole discretion of an independent Plan fiduciary. We will also make available up to five RH Financial Portfolios as investment options to potential plan clients. Consulting services are provided on a non-discretionary basis. A plan fiduciary other than Applicant has responsibility for determining which investment options, including RH Financial Portfolios, to make available to Plan participants.

With respect to RH Financial Portfolios made available to 401(k) plans, our services consist of providing an initial model portfolio and periodic updates to the model portfolio to a plan fiduciary. RH Financial Portfolios made available through our 401(k) platform consist of five models with different risk profiles ranging from conservative to aggressive. Each model has static allocation between equity and income ranging from 20% equity/80% income for the conservative portfolio to 97% equity/3% income for the aggressive portfolio. We will rebalance each RH Financial Portfolio to its target allocation periodically, typically annually. As compensation for consulting services, we will receive a fixed percentage of Plan assets allocated to the Core Investments and RH Financial Portfolios for its services under the consulting agreement with each Plan. This fee is negotiable. This fee does not vary based on recommendations accepted by the Plan fiduciary or selected by participants. The fee does not vary if RH Financial Portfolios are selected as an investment option and no additional fee is charged for ongoing RH Financial Portfolio

reallocation services.

We offer discretionary asset management services to Plans through our RH Financial Portfolio Services or Directly Managed Accounts platforms. We may recommend one or more RH Financial Portfolios and/or other asset allocations for the Plans. The Plans will be charged an asset based fee using the fee rates for RH Financial Portfolio Services and/or Directly Managed Accounts.

### ***3. Ancillary Services – Tracking and Reporting Services***

In addition to our discretionary and non-discretionary investment management services, we also offer you Tracking and Reporting Services. This service assists you with monitoring assets for which we provide neither discretionary nor non-discretionary investment management services. For this service, we provide you reports and other information related to the assets. Our obligations under the “Tracking and Reporting Services” is limited and does not include any duty or obligations to make recommendations regarding investments, advise you regarding risks or hedging strategies, or otherwise provide any investment advice with respect to the assets.

Performance results for Tracking and Reporting Services assets are not included when we calculate our performance results.

### ***4. Personal Financial Management Services***

Personal Financial Management Services involve monitoring, reporting and providing advice to you regarding other investment advisers or broker-dealers. For this service, we do not conduct, directly or indirectly, any securities transactions on behalf of you or participate directly in the selection of the securities to be purchased or sold for the client. We may recommend to you specific changes to investments held in accounts with third-party advisers or other broker-dealers. However, the final decision to make such adjustments and implementation are made at your direction and/or the third-party adviser or broker-dealer without any additional involvement or conduct by us. Our fee for this service is for monitoring, reporting and providing advice regarding the investment advisers or broker-dealers. Any third-party advisers will be licensed or notice filed in the state in which you reside.

### ***5. Financial Planning Services***

If you would like to select these services, we offer financial planning services to you regarding the management of your financial resources based upon an analysis of your individual needs. Our Advisory Representatives that are qualified to provide financial planning services will advise on matters involving investments and non-investment related topics.

Areas addressed may include the following aspects of Financial Planning as described below:

**Financial planning and Analysis:** This service involves a comprehensive financial questionnaire designed to review all aspects of your investment and financial situation, including but not limited to income sources and amounts, investments and savings, life insurance, and retirement plans.

**Retirement Planning:** Retirement Planning involves advice with a thorough cash flow analysis, as well as an analysis of pension options, tax situation, current investments, asset allocation, risk management, and insurance needs.

**Asset Allocation:** This involves advice with respect to Asset Allocation and investment accumulation techniques. Evaluations are made of existing investments in terms of their economic and tax characteristics as well as their suitability for meeting your objectives. We identify tax consequences and their implications.

**Tax Planning Analysis:** This includes alternatives and strategies with respect to how tax laws may affect various financial decisions, e.g. acquisitions, pension strategy, investment purchases, or consolidations among others. Once all pertinent information has been collected, reviewed, and analyzed, a written financial plan – designed to achieve your stated financial goals and objectives may be produced and presented to you. The primary objective of this process is to allow us to assist in developing a strategy for the management of income, assets and liabilities in meeting your financial goals and objectives.

Financial plans are based on your financial situation at the time the plan is presented and are based on financial information disclosed by you to us. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past or projected trends and performance of the market and economy. Past performance is in no way an indication of future performance. We 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 us promptly.

## ***6. Referral to Outside Managers***

We may refer you to unaffiliated money managers when it deems that it is suitable for you in light of your risk tolerance and objectives.

## ***Additional Information Related to Our Services***

In addition to the services described above, we have affiliates that offer accounting, tax and business consulting services, business valuation, and insurance products which are in addition to the advisory fees disclosed herein.

We may engage the investment advisory services of various third-party investment managers and may pay a fee to such managers for the investment management and review of client portfolios. Additionally, we may recommend various third-party asset managers to you and work with the third-party manager to coordinate the management activities of client accounts. Additionally, you may pay fees to a third-party manager or broker/dealer and these fees may be in addition to the fees charged by us. These fees are detailed in the disclosure brochure of the third-party manager. We do not share in any portion of the additional fees or other charges assessed by the third-party manager or broker/dealer. Any third-party investment managers must be licensed or notice filed in your state.

We may also enter agreements with other Registered Investment Advisors wherein we would be engaged to act as a Subadvisor with respect to clients of the other Investment Advisor who engages us. We will receive a fee for providing Subadvisory services which may be paid to us either directly by the client or by the other Investment Advisor.

## **Item 5 Fees and Expenses**

### ***Fees for Investment Management Services***

For our Investment Management services, you pay us based on a percentage of your assets under our management. The maximum annual fee for this service is an annual fee of 1.5%. This fee is negotiable at the discretion of the investment advisor representative introducing the account.

Initial fees for investment management services will be based upon the value of the securities to be managed or

monitored by us at the time the Agreement is executed and will be pro-rated for the number of days remaining in the current calendar quarter. Thereafter, the annual fee will be billed quarterly in advance of the calendar quarter and calculated based upon the value of the account on the last business day of the previous calendar quarter. The fee is negotiable and is not based on a share of capital gains or upon capital appreciation of the funds or any portion of the funds. You will pay any commission charges, transaction charges, custodial fees, or other account maintenance fees. These charges are in addition to the fees we charge. Additionally, you may pay commissions or fees to broker/dealer of any stocks, bonds or mutual funds purchased by broker/dealer. We do not share in any portion of the additional fees and/or charges.

Additional assets deposited into the account after it is opened will be charged a pro-rata fee based upon the number of days remaining in the then current calendar quarter. No fee adjustments will be made for partial withdrawals or for account appreciation or depreciation.

The firm has used other fee schedules in the past. Existing clients may be charged more or less than what is listed below.

#### ***Fees for Retirement Plan Services***

For our Retirement Plan Services, you pay us based on a percentage of your assets under our management. The maximum annual fee for this service is an annual fee of 1.0%. This fee is negotiable at the discretion of the investment advisor representative introducing the account. This is our maximum fee regardless of account size.

#### ***Fees for Asset Tracking and Reporting Services Fees:***

For our Asset Tracking and Reporting Services, you pay us based on a percentage of your assets under our management. The maximum annual fee for this service is an annual fee of 1.0%. This fee is negotiable at the discretion of the investment advisor representative introducing the account. This is our maximum fee regardless of account size.

#### ***Fees for Personal Financial Management Services***

For our Personal Financial Management services, you pay us based on a percentage of your assets under our management. The maximum annual fee for this service is an annual fee of 0.6%. This fee is negotiable at the discretion of the investment advisor representative introducing the account. This is our maximum fee regardless of account size.

#### ***Fees for Personal Financial Planning Services***

Fees for Financial Planning Services Financial planning services will be as a fixed fee of \$595 unless otherwise agreed upon at the time you sign the investment advisory agreement. The fees for financial planning services are due and payable upon completion of the contracted services or 50% deposit at the time an agreement is signed and balance upon completion of the contracted services. Our fees may be lower if this service is in addition to other services you would like to request or if your financial planning needs are less than what we typically provide. Our fee may be higher if you request ongoing financial planning assistance or if your planning needs are more than what we typically provide and you are not requesting any additional services from us.

#### ***Other Important Information Concerning Fees***

We manage client assets primarily utilizing mutual funds. Mutual funds may charge operating expenses,



management fees or other costs that are not reflected in the advisory fee charged by the Applicant. This fee is ultimately borne by the client as shareholder. A complete description of all fees and expenses are in the relevant prospectuses. Our fees on the value of such assets could be avoided by the client directly investing into these mutual funds.

The specific fees applicable to you will be set forth in the Fee and Service Rider attached to the Investment Advisory Agreement.

Upon your written authorization investment management fees may be deducted directly from the account. You will be provided an account statement from the Custodian reflecting the deduction of the fee. If the account does not contain sufficient funds to pay fees, we have limited authority to sell or redeem securities in sufficient amounts to pay fees. You may reimburse the account for fees paid to us, except ERISA and IRA accounts.

You may cancel these services, without penalty, upon written notice within five (5) business days after entering into the Advisory Agreement with us. You will be responsible for any fees and charges you have incurred from third-parties as a result of maintaining the account, such as transaction fees for any securities transactions executed, and account maintenance or custodial fees. Thereafter, either party may terminate Advisory Agreement by providing of written notice to terminate. Upon cancellation, you will receive a refund of all pre-paid quarterly management fees on a pro rated basis through date of termination.

The following represents the maximum fees charged for Applicant's services.

## **Item 6 Performance-Based Fees and Side-by-Side Management**

We do not accept performance-based fees.

## **Item 7 Types of Clients**

We typically provide advice to individuals, high net worth individuals, trusts, estates, retirement plans accounts and other businesses.

We have no minimum fee.

## **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

We may utilize the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

We may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

Different types of investments involve varying degrees of risk. It should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s).

Our methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis we must have access to current/new market information. We have no control over the dissemination rate of market information. If we receive outdated information, it may limit the value of our analysis. Also, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that any recommendation will result in profitable investment opportunities.

Our primary investment strategies - Long Term Purchases and Short Term Purchases are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

We usually invest in various debt (bonds) and fixed income securities, mutual funds, closed-end mutual funds and exchange traded funds and discretionary basis, consistent with your designated objectives.

## **Item 9      Disciplinary Information**

Prior to their affiliation with RH Financial Group, LLC, Charles Rizzo and Gina Hornbogen were Directors of Results One Financial Group, LLC ("Results One"). Ms. Hornbogen also served as the Chief Compliance Officer of that firm. The Securities and Exchange Commission ("SEC") has conducted an administrative proceeding and investigation into whether a former director of Results One, Steven Salutric, was properly supervised by Mr. Rizzo and Ms. Hornbogen during a period in which he misappropriated funds from Results One clients.

Without admitting or denying the findings, on July 20, 2012, Mr. Rizzo and Ms. Hornbogen agreed to the entry by the SEC of an order settling the administrative proceeding (the "2012 Order") finding that Mr. Rizzo and Ms. Hornbogen had failed reasonably to supervise Mr. Salutric. Under the 2012 Order, Rizzo and Hornbogen were barred from associating in a supervisory capacity with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent or nationally recognized statistical rating organization. Rizzo was ordered to pay a disgorgement of \$35,079, prejudgment interest of \$7,731 and civil penalties of \$130,000 to the SEC. Hornbogen was ordered to pay a disgorgement of \$15,592, prejudgment interest of \$3,467 and civil penalties of \$25,000 to the SEC.

## **Item 10      Other Financial Industry Activities and Affiliations**

Some of our Advisory Representatives are also licensed as insurance agents and are registered representatives, and investment adviser representatives, offering securities and investment advice through American Portfolios Financial Services, Inc. In this capacity, they earn commissions for the sale of investment and insurance products in addition to any fees they may earn for providing investment advice through RH Financial Group, LLC.

In addition to the investment advisory services disclosed, RH Financial Group, LLC has an affiliate, CLR Financial, LLC that offers accounting, tax and business consulting services, business valuation for a fee which is in addition to the advisory fees disclosed herein.

Charles Rizzo's principal business is providing investment advisory services through Applicant. Approximately 10% of Charles Rizzo's time is spent providing accounting services through an affiliate CLR Financial, LLC, 10% acting as an insurance and securities agent.

Charles L. Rizzo owns a 12.5% interest, in a limited liability company formed to purchase commercial real estate. Although several of the other owners of the limited liability company are clients of Applicant; Applicant did not solicit or advise such clients regarding their ownership interest in the limited liability company.

Charles L. Rizzo, Member and Director of RH Financial Group, LLC also serves as Manager of a private placement, Park Avenue Entertainment, LLC, d.b.a. Rizzo's that was formed as an Illinois Limited Liability Company to own and operate Rizzo's, a restaurant and bar, providing an upscale restaurant and night entertainment and bar in the downtown Naperville Illinois area.

These activities create a conflict of interest in that our Advisory Representatives have financial incentives to recommend additional products or services to you. We address these conflicts by doing the following:

We must disclose any potential or actual conflicts of interest when dealing with clients.

We are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and,
- A duty to be loyal to clients.

Clients always have the option of purchasing recommended investment and insurance products through other broker-dealers.

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

Associated persons may buy or sell for their own accounts the same securities recommended to you. They may do so at the same time as they, or a related person, buy or sell the same securities for their own account. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to you. We request information about all of our associate's transactions and monitor them for any wrongdoing.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Advisor does not deem appropriate to buy or sell for clients.

We have adopted a Code of Ethics to instruct its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Firm and our personnel owe a duty of loyalty, fairness and good faith to their clients, and the obligation to adhere not only to the specific provisions of the code but also to the general principles that guide the Code. The Code covers a range of topics including 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. We will provide a copy of the Code to any client or prospective Client upon request.

## **Item 12 Brokerage Practices**

We recommend clients custody their assets at Constellation Trust Company. Constellation Trust Company is an affiliate of Orion Advisor Services, LLC, the company that provides us with back office services and produces our quarterly performance reports. Because we recommend their affiliate, Orion Advisor Services, LLC provides us with an offset of the fees we would pay to them based on the amount of shareholder servicing fees Constellation Trust Company receives from the funds we include in our investment management program.

This provided us with an incentive to recommend Constellation Trust Company as a custodian based on our interest in receiving this service; however we feel that it is also in your best interest. The reduction or elimination of our service fee with Orion benefits all of our clients.

We do not receive any client referrals from a broker-dealer or custodial firm.

Not all advisers require clients to use a particular custodian.

Clients electing to use a different custodian should be aware that we may not be able to achieve the most favorable execution of your transactions, it may cost you more money. You may pay higher commissions because you may not be able to aggregate orders to reduce transaction costs or you may receive less favorable prices.

We permit block trading when the following conditions are met:

Orders of two or more clients may be bunched only if we have determined, on an individual basis that the securities order is:

1. In the best interests of each client participating in the order;
2. Consistent with our duty to obtain best execution; and
3. Consistent with the terms of the investment Advisory agreement of each participating client.

When conducting a block trade, we will determine the accounts that will participate, and the specific allocations in advance of the transaction. If the entire order is filled, you will receive your portion of the allocation specified on the trade ticket. All allocations are prior to the close of business on trade date. Client accounts participating in the transaction will receive the weighted average price of the security and will incur a pro-rata share of the transaction cost.

If part of the order is unfilled, the allocation is based on a pro-rata share per client.

The books and records of the Firm separately reflect, for each client for whom an order is bunched, the securities held by, purchased, and sold for that client.

## **Item 13 Review of Accounts**

### ***Review of Accounts***

Investment management accounts utilizing the RH Financial Portfolios are reviewed at least quarterly for the appropriate range of asset allocation, risk tolerance, and to ensure compliance with your objectives. A member or

members of the Investment Committee review, on behalf of the applicant, the accounts and makes the final decision as to what recommendations will be made.

Management reports are provided to the Investment Committee on at least an annual basis to set general investment direction and outlining company performance and investments.

An Investment Committee, consisting of officers and other individuals of the firm, meet from time to time to review general investment direction, asset allocation and to review the direction of the economy and how that may affect our investment posture and recommendations. Additionally, the committee reviews major changes in equity and fixed income investment direction.

Accounts are reviewed on an ongoing basis by the Advisory Representative. Each quarter, Charles Rizzo reviews a sample of accounts managed and document their review.

### ***Reports to Clients***

We provide our investment management clients utilizing the RH Financial Portfolio Services, and our Directly Managed Accounts with quarterly written reports which contain a list of assets under management, fair market value of each asset, a summary of the diversification of investments, quantity of each asset, and price used to calculate value. In addition, clients receive a report showing quarterly performance in dollars. The report shows beginning and ending value, net contributions, capital appreciation, dividends, interest and management fees.

You may receive additional reports, quarterly or periodically, to meet specific needs or to show in more detail investment performance or current investment status.

Clients who utilize our comprehensive financial planning services will receive a written financial plan and may receive subsequent written reports as requested. Partial plans are generally provided with a written analysis and oral recommendations.

## **Item 14 Client Referrals and Other Compensation**

We enter into arrangements with individuals ("Solicitor") whereby the Solicitor will refer clients who may be a candidate for investment advisory services to us. In return, we will agree to compensate the Solicitor for the referral. Compensation to the Solicitor is dependent on the client entering into an advisory agreement with us for advisory services.

Compensation to solicitor will be an agreed upon percentage of Applicant's advisory fee. Applicant's referral program is in compliance with the federal regulation as set out in 17 CFR section 275.206(4)-3. The solicitation/referral fee is paid pursuant to a written agreement retained by both the investment adviser and the solicitor. The Solicitor will be required to provide the client with a copy of the Applicant's Form ADV Part 2 and a Solicitor Disclosure brochure prior to or at the time of entering into any investment advisory contract with Applicant. Solicitor is not permitted to offer clients any investment advice on behalf of Applicant.

## **Item 15 Custody**

We have custody of client funds in that we deduct fees from your accounts. The custodian of your assets sends quarterly statements directly to you. You should carefully review those statements.

We also send performance statements to you, and we urge you to compare the account statements you receive from the custodian to those you receive from us.

## **Item 16 Investment Discretion**

We request that you give us discretionary authority to manage your accounts by signing a written power of attorney. You may place reasonable restrictions on the types of securities or on specific securities that we may purchase or sell.

## **Item 17 Voting Client Securities**

We do not vote proxies on your behalf. You retain that right unless you make other arrangements with the custodian of your assets. You will receive proxies or other solicitations directly from the custodian of your assets. You may contact us with questions about proxies.

## **Item 18 Financial Information**

We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to you. We request discretionary authority for some of our services. We do not require prepayment of over \$500 for six or more months in advance.

## **Item 19 Requirements for State Registered Advisers**

Our owners are Charles Rizzo and Gina Hornbogen. Ann Zemann is the Chief Compliance Officer of RH Financial Group, LLC.

**NAME: Charles L. Rizzo**

Year of Birth: 1950

Formal Education:

Bradley University, Peoria, IL- attended for 1 year

Illinois Central College, Peoria, IL- attended for one-half a year

College of DuPage, Glen Ellyn, IL- 1969-1970, Associates

Northern Illinois University, DeKalb, IL- 1970-1973, BS Education/minor in Accounting

University of Illinois, Chicago, IL- attended for one-half a year

DePaul University, Chicago, IL- attended for one-half a year

CFP, College for Financial Planning, Denver, CO, 1984

Enrolled Agent License – 1979 licensed with the US Treasury Department to practice before the Internal Revenue Service

Securities Licenses –, 7 General Securities Representative, and 63 Uniform Securities Agent State

Business Background:

RH Financial Group, LLC, a Registered Investment Advisor- position: Member - 01-2010 to Present

American Portfolios Financial Services, Inc., a broker/dealer- position: Registered Representative – 06/2009 to Present

Questar Capital Corporation, a broker/dealer- position: Registered Principal - 09/2006 to 06/2009

Results One Financial, LLC, a former Registered Investment Advisor – position: Member-Director, Advisory Representative– 07/2000 to 02/2010

Results One Certified Public Accountants, LLC – position: Member-Director- 01/2007 to 02/2010

Results One Financial Mortgage Corp., a mortgage company – position: Stockholder and Loan Officer – 12/2000-12/2009

Waterstone Financial Group, a broker/dealer –position: General Securities Principal and Registered Representative – 11/1997 to 09/2006

Rizzo, Wagner & Associates, Ltd., and accounting and tax firm – position: President – 06/1994 to 12/2005

CLR Financial Associates, Inc., a former Registered Investment Advisor – position: President – 08/1982 to 12/2005

**Name: Gina Hornbogen**

**Year of Birth: 1973**

**Formal Education:**

St. Xavier University

University of Phoenix, Bachelors in Finance

Securities Licenses --, Series 7 General Securities Representative, 65 Uniform Investment Advisor Representative and 63 Uniform Securities Agent State

**Business Background:**

RH Financial Group, LLC, a Registered Investment Advisor- position: Member 01/2010 to Present

American Portfolios Financial Services, Inc., a broker/dealer- position: Registered Representative 07/2009 to present

Questar Capital Corporation, a broker/dealer, position: Registered Principal 03/2009-06/2009, Registered Representative – 09/2006 – 03/2009

Results One Financial, LLC, a former Registered Investment Advisor – positions: Advisory Representative 7/2004 – Present; Chief Compliance Officer – 10/2004 – 02/2010; Administrative Assistant 12/2000 – 07/2004

Waterstone Financial Group, a broker/dealer – position: Registered Representative – 01/2001 – 9/2006

**Name: Ann Zemann**

**Year of Birth: 1974**

**Formal Education:**

Bachelor of Science, University of Nebraska at Omaha

**Business Background:**

Stile Compliance Services, Inc., President/Compliance Consultant, 2/2005 - Present

We have no other businesses to disclose outside of those discussed in Item 10 of this brochure.

Our firm is not compensated with performance-based fees.

Please see Item 9 of this document for information on our associates' disciplinary history.

We have no relationship or arrangement with any issuer of securities.



## Brochure Supplement

Part 2B of Form ADV

Firm Brochure

Charles Rizzo

2015 Spring Road, Suite 255

Oakbrook, IL 60523

Phone: (630) 333-9207

Date: April 3, 2013

This brochure supplement provides information about Charles Rizzo that supplements the RH Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Ann Zemann if you did not receive RH Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.

## Item 2 Educational Background and Business Experience

**NAME: Charles L. Rizzo**

Year of Birth: 1950

Formal Education:

Bradley University, Peoria, IL- attended for 1 year

Illinois Central College, Peoria, IL- attended for one-half a year

College of DuPage, Glen Ellyn, IL- 1969-1970, Associates

Northern Illinois University, DeKalb, IL- 1970-1973, BS Education/minor in Accounting

University of Illinois, Chicago, IL- attended for one-half a year

DePaul University, Chicago, IL- attended for one-half a year

CFP, College for Financial Planning, Denver, CO, 1984

Enrolled Agent License – 1979 licensed with the US Treasury Department to practice before the Internal Revenue Service

Securities Licenses – 7 General Securities Representative, and 63 Uniform Securities Agent State

Business Background:

RH Financial Group, LLC, a Registered Investment Advisor- position: Member - 01-2010 to Present

American Portfolios Financial Services, Inc., a broker/dealer- position: Registered Representative – 06/2009 to Present

Questar Capital Corporation, a broker/dealer- position: Registered Principal - 09/2006 to 06/2009

Results One Financial, LLC, a former Registered Investment Advisor – position: Member-Director, Advisory Representative– 07/2000 to 02/2010

Results One Certified Public Accountants, LLC – position: Member-Director- 01/2007 to 02/2010

Results One Financial Mortgage Corp., a mortgage company – position: Stockholder and Loan Officer – 12/2000-12/2009

Waterstone Financial Group, a broker/dealer –position: General Securities Principal and Registered Representative – 11/1997 to 09/2006

Rizzo, Wagner & Associates, Ltd., and accounting and tax firm – position: President – 06/1994 to 12/2005

CLR Financial Associates, Inc., a former Registered Investment Advisor – position: President – 08/1982 to 12/2005

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

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

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

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

- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field.
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

### **Item 3      Disciplinary Information**

Prior to his affiliation with RH Financial Group, LLC, Charles Rizzo was a Director of Results One Financial Group, LLC (“Results One”). The Securities and Exchange Commission (“SEC”) has conducted an administrative proceeding and investigation into whether a former director of Results One, Steven Salutric, was properly supervised by Mr. Rizzo during a period in which he misappropriated funds from Results One clients.

Without admitting or denying the findings, on July 20, 2012, Mr. Rizzo agreed to the entry by the SEC of an order settling the administrative proceeding (the “2012 Order”) finding that Mr. Rizzo had failed reasonably to supervise Mr. Salutric. Under the 2012 Order, Rizzo was barred from associating in a supervisory capacity with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent or nationally recognized statistical rating organization. Rizzo was ordered to pay a disgorgement of \$35,079, prejudgment interest of \$7,731 and civil penalties of \$130,000 to the SEC.

### **Item 4      Other Business Activities**

Our associates have other business activities from which they derive compensation. More information about these activities and the compensation is contained in Item 10 of our firm brochure (attached).

### **Item 5      Additional Compensation**

There are no issues of additional compensation to be disclosed.

### **Item 6      Supervision**

The person responsible for Supervision is Ann Zemann. She supervises the associates by monitoring their emails, reviewing paperwork they complete, meeting with them regularly, and enforcing the Firm's Written Supervisory Procedures and Code of Ethics. You may contact her at (402)502-2881 with any questions or concerns.

## **Item 7      Additional Requirements for State-Registered Advisers**

There are no additional items to be disclosed.

## **Brochure Supplement**

Part 2B of Form ADV

Firm Brochure

Gina Hornbogen

2015 Spring Road, Suite 255

Oakbrook, IL 60523

Phone: (630) 333-9207

Date: April 3, 2013

This brochure supplement provides information about Gina Hornbogen that supplements the RH Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Ann Zemmann if you did not receive RH Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.

## **Item 2      Educational Background and Business Experience**

**Name: Gina Hornbogen**

**Year of Birth: 1973**

Formal Education:

St. Xavier University

University of Phoenix, Bachelors in Finance

Securities Licenses --, Series 7 General Securities Representative, 65 Uniform Investment Advisor Representative and 63 Uniform Securities Agent State

Business Background:

RH Financial Group, LLC, a Registered Investment Advisor- position: Member 01/2010 to Present

American Portfolios Financial Services, Inc., a broker/dealer- position: Registered Representative 07/2009

to present

Questar Capital Corporation, a broker/dealer, position: Registered Principal 03/2009-06/2009, Registered Representative – 09/2006 – 03/2009

Results One Financial, LLC, a former Registered Investment Advisor – positions: Advisory Representative 7/2004 – Present; Chief Compliance Officer – 10/2004 – 02/2010; Administrative Assistant 12/2000 – 07/2004

Waterstone Financial Group, a broker/dealer – position: Registered Representative – 01/2001 – 9/2006

### **Item 3      Disciplinary Information**

Prior to her affiliation with RH Financial Group, LLC, Gina Hornbogen was a Director of Results One Financial Group, LLC (“Results One”). Ms. Hornbogen also served as the Chief Compliance Officer of that firm. The Securities and Exchange Commission (“SEC”) has conducted an administrative proceeding and investigation into whether a former director of Results One, Steven Salutric, was properly supervised by Ms. Hornbogen during a period in which he misappropriated funds from Results One clients.

Without admitting or denying the findings, on July 20, 2012, Ms. Hornbogen agreed to the entry by the SEC of an order settling the administrative proceeding (the “2012 Order”) finding that Ms. Hornbogen had failed reasonably to supervise Mr. Salutric. Under the 2012 Order, Hornbogen was barred from associating in a supervisory capacity with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent or nationally recognized statistical rating organization. Hornbogen was ordered to pay a disgorgement of \$15,592, prejudgment interest of \$3,467 and civil penalties of \$25,000 to the SEC.

### **Item 4      Other Business Activities**

Our associates have other business activities from which they derive compensation. More information about these activities and the compensation is contained in Item 10 of our firm brochure (attached).

### **Item 5      Additional Compensation**

There are no issues of additional compensation to be disclosed.

### **Item 6      Supervision**

The person responsible for Supervision is Ann Zemann. She supervises the associates by monitoring their emails, reviewing paperwork they complete, meeting with them regularly, and enforcing the Firm's Written Supervisory Procedures and Code of Ethics. You may contact her at (402)502-2881 with any questions or concerns.

### **Item 7      Additional Requirements for State-Registered Advisers**

There are no additional items to be disclosed.

## Brochure Supplement

Part 2B of Form ADV

Firm Brochure

Michael Kronk

2015 Spring Road, Suite 255

Oakbrook, IL 60523

Phone: (630) 333-9207

Date: April 3, 2013

This brochure supplement provides information about Michael Kronk that supplements the RH Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Ann Zemann if you did not receive RH Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.

### Item 6 Supervision

The person responsible for Supervision is Ann Zemann. She supervises the associates by monitoring their emails, reviewing paperwork they complete, meeting with them regularly, and enforcing the Firm's Written Supervisory Procedures and Code of Ethics. You may contact her at (402)502-2881 with any questions or concerns.

### Item 2 Educational Background and Business Experience

**Name: Michael V. Kronk**

**Year of Birth: 1944**

**Formal Education:**

Wayne State University, Detroit, MI - attended for 1 year

Sacred Heart College, Detroit, MI - 1964-1967, BA in English

University of Detroit, Detroit, MI – 1969-1970, MA in Theology

West Michigan University, Kalamazoo, MI – attended for 3 years in the MBA program

CFP, College for Financial Planning, Denver, CO 1997

Securities Licenses – Series 7 General Securities Representative and 63 Uniform Securities Agent State

#### Business Background:

RH Financial Group, LLC, a Registered Investment Advisor- position: Investment Committee Chair Person and Advisory Representative – 02/2010 to present

American Portfolios Financial Services, Inc., a broker/dealer- position: Registered Representative 07/2009 to present

Questar Capital Corporation, a broker/dealer- position:—Registered Representative, 09/2006 to 06/2009

Results One Financial, LLC, a former Registered Investment Advisor - position: Investment Committee Chair Person and Advisory Representative – 07/2000 to 02/2010

Waterstone Financial Group, a broker/dealer – position: Registered Representative – 11/1997 to 09/2006

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

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

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

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

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field.
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

### **Item 3      Disciplinary Information**

Mr. Kronk has no disciplinary information to report.

### **Item 4      Other Business Activities**

Our associates have other business activities from which they derive compensation. More information about these activities and the compensation is contained in Item 10 of our firm brochure (attached).

### **Item 5      Additional Compensation**

There are no issues of additional compensation to be disclosed.

### **Item 6      Supervision**

The person responsible for Supervision is Ann Zemann. She supervises the associates by monitoring their emails, reviewing paperwork they complete, meeting with them regularly, and enforcing the Firm's Written Supervisory Procedures and Code of Ethics. You may contact her at (402)502-2881 with any questions or concerns.

### **Item 7      Additional Requirements for State-Registered Advisers**

There are no additional items to be disclosed.



## Brochure Supplement

Part 2B of Form ADV

Firm Brochure

Henry Torres

2015 Spring Road, Suite 255

Oakbrook, IL 60523

Phone: (630) 333-9207

Date: April 3, 2013

This brochure supplement provides information about Henry Torres that supplements the RH Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Ann Zemann if you did not receive RH Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.

## Item 2 Educational Background and Business Experience

**Name: Henry S. Torres**

Year of Birth: 1938

### Formal Education:

Spring Hill College, BA, Education 1962

Spring Hill College, MA, Philosophy, 1963

Loyola University, MA, History, 1970

Nova University, MPA, (Master of Public Administration) 1967

Nova University, DPA, (Doctor of Public Administration) 1977

Securities Licenses- Series 7, General Securities Representative, 24, General Securities Principal, 63,  
Uniform Securities Agent, 65, Uniform Investment Adviser

### Business Background:

RH Financial Group, LLC, a Registered Investment Advisor- position: Advisory Representative – 02/2010 to present

American Portfolios Financial Services, Inc., a broker/dealer- position: Registered Representative 07/2009 to 12/2011, Registered Assistant 01/2012- Present

Questar Capital Corporation, a broker/dealer, position: Registered Representative 03/2007 – 07/2009

Results One Financial, LLC, a former Registered Investment Advisor- position: Advisory Representative 03/2007-02/2010

Capital Securities Investment Corporation, a broker/dealer and registered investment advisor- position: Registered Principal and Registered Representative 03/1999 – 03/2007

### **Item 3      Disciplinary Information**

Mr. Torres has no disciplinary information to report.

### **Item 4      Other Business Activities**

Our associates have other business activities from which they derive compensation. More information about these activities and the compensation is contained in Item 10 of our firm brochure (attached).

### **Item 5      Additional Compensation**

There are no issues of additional compensation to be disclosed.

### **Item 6      Supervision**

The person responsible for Supervision is Ann Zemann. She supervises the associates by monitoring their emails, reviewing paperwork they complete, meeting with them regularly, and enforcing the Firm's Written Supervisory Procedures and Code of Ethics. You may contact her at (402)502-2881 with any questions or concerns.

### **Item 7      Additional Requirements for State-Registered Advisers**

There are no additional items to be disclosed.

## Brochure Supplement

Part 2B of Form ADV

Firm Brochure

Paul Mardoian

2015 Spring Road, Suite 255

Oakbrook, IL 60523

Phone: (630) 333-9207

Date: April 3, 2013

This brochure supplement provides information about Paul Mardoian that supplements the RH Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Ann Zemann if you did not receive RH Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.

### Item 2 Educational Background and Business Experience

Paul Mardoian, Born: 1956

#### Education Background:

Northwestern University, Bachelor's Degree, Music Education

Northwestern University, Master's Degree, Music

CFP, College for Financial Planning, Denver, CO, 1992

#### Business Background:

RH Financial Group, LLC, a Registered Investment Advisor- position: Advisory Representative – 03/2010 to present

American Portfolios Financial Services, Inc., a broker/dealer- position: Registered Representative 07/2009 to present

Questar Capital Corporation, a broker/dealer- position:—Registered Representative, 09/2006 to 06/2009

Results One Financial, LLC, a former Registered Investment Advisor - position: Advisory Representative –

07/2000 to 02/2010

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

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- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year).
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

### **Item 3      Disciplinary Information**

Mr. Mardoian has no disciplinary information to report.

### **Item 4      Other Business Activities**

Our associates have other business activities from which they derive compensation. More information about these activities and the compensation is contained in Item 10 of our firm brochure (attached).

### **Item 5      Additional Compensation**

There are no issues of additional compensation to be disclosed.

### **Item 6      Supervision**

The person responsible for Supervision is Ann Zemann. She supervises the associates by monitoring their emails, reviewing paperwork they complete, meeting with them regularly, and enforcing the Firm's Written Supervisory Procedures and Code of Ethics. You may contact her at (402)502-2881 with any questions or concerns.

### **Item 7      Additional Requirements for State-Registered Advisers**

There are no additional items to be disclosed.

## Brochure Supplement

Part 2B of Form ADV

Firm Brochure

Ann Zemann

2017 S. 183rd Circle

Omaha, NE 68130

Phone: (630) 333-9207

Date: May 6, 2013

This brochure supplement provides information about Ann Zemann that supplements the RH Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Ann Zemann if you did not receive RH Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.

### Item 2 Educational Background and Business Experience

**Name: Ann Zemann**

Year of Birth: 1974

Formal Education:

University of Nebraska at Omaha, 1997, Bachelor of Science.

Business Background:

Stile Compliance Services, Inc., President and Compliance Consultant 1/2006 through Present

### Item 3 Disciplinary Information

Ms. Zemann has no disciplinary information to disclose.

### Item 4 Other Business Activities

Ms. Zemann is the Chief Compliance Officer of RH Financial Group, LLC, through her compliance consulting firm, Stile Compliance Services, Inc. Ms. Zemann offers compliance consulting services to other investment advisory firms and she and her firm receive compensation for these services.

## **Item 5      Additional Compensation**

There are no issues of additional compensation to be disclosed.

## **Item 6      Supervision**

The person responsible for Supervision of Ann Zemann is Thomas Wirtshafter of American Portfolios Financial Services. He supervises Ms. Zemann's activities by ongoing regular contact and oversight of her duties. You may contact him at (402)502-2881 with any questions or concerns.

## **Item 7      Additional Requirements for State-Registered Advisers**

There are no additional items to be disclosed.