

## **Part 2A of Form ADV: Firm Brochure**

### **Item 1          Cover Page**

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**This brochure provides information about the qualifications and business practices of Timing Strategies. If you have any questions about the contents of this brochure, please contact us at 609-588-4444 and /or [fscklein@aol.com](mailto:fscklein@aol.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 Timing Strategies also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Registration with the SEC does not imply any particular level of skill or training.**

### **Item 2          Material Changes**

Material changes to the ADV Brochure will be provided to clients who have received previous versions of this brochure. The last annual update of our brochure was June 30, 2014.

Changes for 2011 include substantial format revisions to meet the new requirements set forth by the Securities and Exchange Commission (SEC). It is now a fully narrative brochure and eliminates the checkbox pages. The narrative has been reorganized and clarified.

Within 120 days of our fiscal year-end we will deliver our annual Summary of Material Changes if there were material changes since the last annual updating amendment.

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#### **Item 4            Advisory Business**

Timing Strategies Corporation (TSC) is a small investment advisory firm, authorized to do business in New Jersey, which has been in existence since 1982. It has been a registered advisor with the SEC since shortly after inception. Roger Klein is the sole shareholder and director who oversees all aspects of operation, sets policy, makes all the decisions and meets with clients. There are two other employees of TSC who carry out all the administrative duties, including maintaining client files and portfolio records, accounting and bookkeeping, and placing trade orders recommended by Roger Klein.

TSC manages investment portfolios on a discretionary basis. TSC also provides continuous investment advice on a non-discretionary basis. TSC follows an asset allocation approach to managing client funds. Investments are made using no-load mutual funds, exchange-traded funds and individual equities. TSC attempts to find those asset classes that represent the most favorable reward-risk prospects.

Services are based on the individual needs of the client. At an initial discussion, where the client describes their objectives and financial situation and is given the opportunity to impose reasonable restrictions on the management of their account, each client is assigned to a risk category based upon their comfort level of volatility. TSC has established three levels of risk. The highest level of risk is the risk associated with stock market volatility assuming a portfolio invested 100% in domestic and foreign equities. The lowest level of risk is the risk associated with the volatility of a portfolio consisting of 50% domestic bonds and 50% domestic and foreign stocks. A middle ground of risk is the volatility associated with a portfolio consisting of 60% domestic and foreign equities and 40% domestic bonds. The client chooses the level of volatility with which they are comfortable. Not all client portfolios in each category are the same. Differences depend upon when the account started, what funds were available at the time as funds may close when they get very large, tax reasons and economic conditions. Each client account is analyzed and valued at the end of the month and is reallocated when necessary. In addition, client account values and positions are reviewed every morning. If there are any errors or discrepancies they are noted immediately and rectified.

Clients are encouraged, in monthly letters sent with monthly statements which show all account activity during the month, to contact TSC at any time if they have questions or concerns regarding their account. In addition, clients receive monthly statements and trade confirmations from their custodian/brokerage firm. The client will retain rights of ownership of all securities and funds in the account to the same extent as if the client held the securities and funds outside the program.

As of March 31, 2014, TSC had \$44,476,845 of assets under management on a discretionary basis and \$61,425,936 of assets under management on a non-discretionary basis.

## **Item 5            Fees and Compensation**

For discretionary accounts, the normal fee is 1% annually of the assets under management. For accounts in excess of \$1,000,000 the fee is negotiable. These fees are for advisory services only and do not include any transaction fees or commissions which may be charged separately by the broker/dealer custodial firm.

For non-discretionary accounts, the fee is negotiable and is determined by the amount of assets under management and the time required for the appropriate supervision.

The client decides whether the fees are deducted directly from their account or are paid directly by the client. In either case, the client receives both a statement and an invoice regarding the amount owed. The custodian also receives an invoice and statement.

Fees are billed quarterly in advance of services. If a client wants to cancel their management agreement with TSC, they may do so at any time by phone or by mail and receive a pro-rated refund of all fees paid. When an account is closed, TSC will notify the client in writing that TSC is being removed as the investment advisor.

In addition to fees paid for advisory services with respect to clients' investments in mutual funds, clients may pay additional fees on the mutual fund investment because the mutual funds also pay advisory and/or management fees to an advisor. There may also be commission charges related to transactions in a brokerage account. See the heading Brokerage Practices for more information.

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

TSC does not charge performance-based fees, which are based on capital gains in the client account.

## **Item 7            Types of Clients and Account Minimums**

TSC provides advisory services to individuals, trusts and pension plans. There are no requirements for opening or maintaining an account. There is no minimum account size.

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

Analysis utilized includes charting, fundamental, technical and cyclical. TSC uses asset allocation strategies for portfolio management.

While there is risk in all investments, some carry a greater degree of risk or higher costs. There is no guarantee that the investment strategy selected for the client will result in the

client's goals being met, nor is there any guarantee of profit or protection from loss. For those investments sold by prospectus, clients should read the prospectus in full.

**Item 9            Disciplinary Information**

TSC does not have any disclosure items with respect to legal or disciplinary events.

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

TSC is not affiliated with any other investment professional organization and has no conflicts of interest to disclose.

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

TSC maintains a Code of Ethics which sets forth standards of conduct expected of advisory personnel; requires compliance with federal securities laws; and addresses conflicts that may arise from personal trading by advisory personnel. TSC will provide a copy of the Code of Ethics to any client or prospective client upon request.

At times TSC and/or its employees may take positions in the same securities as clients. The firm and its employees will generally be "last in" and "last out" for the trading day when the trading occurs in close proximity to client trades. We will not violate our fiduciary responsibilities to our clients.

**Item 12           Brokerage Practices**

TSC primarily uses TD Ameritrade Institutional, a discount broker, and recommends that clients maintain their accounts at TD Ameritrade. TD Ameritrade Institutional is recommended because of its discount brokerage rates and its execution services. TD Ameritrade Institutional provides the clients with confirmations of transactions and monthly statements. While TD Ameritrade Institutional is the recommended broker/custodian, clients may choose a different brokerage firm.

TSC does not receive compensation from any brokerage firm in the form of research, products or any other soft dollar services. TSC does not compensate brokers or any other professional such as lawyers or accountants for client referrals.

### **Item 13        Review of Accounts**

TSC monitors the clients' individual investment portfolios daily and portfolio performance and asset allocation are reviewed regularly and at least monthly. Clients are sent monthly portfolio statements and are provided with a letter providing a general discussion of market conditions and the outlook for the major asset classes. Quarterly statements contain year-to-date rate of return calculations.

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

There are no payments made for client referrals.

### **Item 15        Custody**

Although client assets are held at third-party custodians, TSC is deemed to have custody of client funds solely because of the fee deduction authority granted by the client in the investment advisory agreement and the account application. Except for this fee deduction we do not have the authority to withdraw funds from a client's account.

Clients will receive account statements from the custodian. The client is urged to compare custodial account statements against statements prepared by TSC for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends and other factors. The custodial statement is the official record of your account for tax purposes.

### **Item 16        Investment Discretion**

TSC maintains full discretion under a limited power of attorney, when granted by the client, as to the securities and the amount of securities bought and sold. TSC does not have authority to withdraw funds or to take custody of client funds or securities other than under the terms of the fee payment authorization provided by the client.

**Item 17      Voting Client Securities**

TSC does not vote proxies. It is the clients' responsibility to vote proxies. Clients will receive proxy material directly from the custodian.

**Item 18      Financial Information**

TSC does not have any disclosure items in this section.