

The Investment House LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of The Investment House LLC. If you have any questions about the contents of this brochure, please contact us at (310) 873-3021 or by email at: info@tihllc.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 The Investment House LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The Investment House LLC's CRD number is: 163493.

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Registration does not imply a certain level of skill or training.

Version Date: 3/1/2014

Item 2: Material Changes

This Firm Brochure, dated 3/1/2014, provides you with a summary of The Investment House, LLC ("TIH") advisory services and fees, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This Item is used to provide our clients with a summary of new and/or updated information; we will inform of the revision(s) based on the nature of the information as follows:

1. Annual Update: We are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of December 31. We will provide you with either a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE or we will provide you with our revised Brochure that will include a summary of those changes in this Item.
2. Material Changes: Should a material change in our operations occur, depending on its nature we will promptly communicate this change to clients (and it will be summarized in this Item). "Material changes" requiring prompt notification will include changes of ownership or control; location; disciplinary proceedings; significant changes to our advisory services or advisory affiliates – any information that is critical to a client's full understanding of who we are, how to find us, and how we do business.

The following summarizes new or revised disclosures based on information previously provided in our Firm Brochure dated March 2013:

Item 4 – Advisory Business:

TIH serves as the investment advisor to an unaffiliated private fund.

As 12/31/13 TIH was actively managing approximately \$541 million of client assets.

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

TIH offers a Growth, Balanced, managed ETF and Special Situations strategy.

Item 9 – Disciplinary Information:

A summary of two disciplinary events for Mr. Peter Gardiner, Managing Director of TIH have been added. The details of these events can be found in our ADV Part 1 at www.adviserinfo.sec.gov.

Item 12 – Brokerage Practices:

We have recently entered into an arrangement with TD Ameritrade, Inc., a registered broker-dealer and FINRA member firm to offer custodial and execution services to TIH clients.

Added additional descriptions regarding research and soft dollar benefits derived from our relationships with custodial broker-dealers.

Item 14 – Client Referrals and Other Compensation:

We have recently entered into a solicitation arrangement with a third party and have updated this section to outline the details and requirements pertaining to these types of arrangements.

Item 3: Table of Contents

Table of Contents

Item 2: Material Changes.....	i
Item 3: Table of Contents.....	ii
Item 4: Advisory Business.....	1
A. Description of the Advisory Firm.....	1
B. Types of Advisory Services.....	1
Investment Supervisory Services.....	1
Mutual Fund Management.....	1
Services Limited to Specific Types of Investments.....	2
C. Client Tailored Services and Client Imposed Restrictions.....	2
D. Wrap Fee Programs.....	2
E. Amounts Under Management.....	2
Item 5: Fees and Compensation.....	3
A. Fee Schedule.....	3
Investment Supervisory Services Fees.....	3
B. Payment of Fees.....	3
Payment of Investment Supervisory Fees.....	3
C. Clients Are Responsible For Third Party Fees.....	4
D. Prepayment of Fees.....	4
E. Outside Compensation For the Sale of Securities to Clients.....	4
F. Other Compensation.....	4
Item 6: Performance-Based Fees and Side-By-Side Management.....	5
Item 7: Types of Clients.....	5
Minimum Account Size.....	5
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss.....	6
A. Methods of Analysis and Investment Strategies.....	6
Methods of Analysis.....	6
Growth Strategy.....	6

Resources	6
Investment Strategies	7
SRSW	7
Special Situations	7
B. Material Risks Involved	7
Methods of Analysis.....	7
Fundamental analysis	7
Investment Strategies	7
C. Risks of Specific Securities Utilized.....	9
Item 9: Disciplinary Information	10
A. Criminal or Civil Actions	10
B. Administrative Proceedings	10
C. Self-regulatory Organization (SRO) Proceedings.....	10
Item 10: Other Financial Industry Activities and Affiliations.....	10
A. Registration as a Broker/Dealer or Broker/Dealer Representative	10
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor	11
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests	11
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections	11
E. Investment Advisor to a Mutual Fund	12
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
A. Code of Ethics	12
B. Recommendations Involving Material Financial Interests	12
C. Investing Personal Money in the Same Securities as Clients.....	12
D. Trading Securities At/Around the Same Time as Clients' Securities	13
Item 12: Brokerage Practices	13
A. Factors Used to Select Custodians and/or Broker/Dealers.....	13
1. Research and Other Soft-Dollar Benefits.....	14
2. Brokerage for Client Referrals	17
3. Clients Directing Which Broker/Dealer/Custodian to Use.....	18

B. Aggregating (Block) Trading for Multiple Client Accounts	18
Item 13: Reviews of Accounts	18
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews	18
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts.....	19
C. Content and Frequency of Regular Reports Provided to Clients.....	19
Item 14: Client Referrals and Other Compensation.....	19
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	19
B. Compensation to Non – Advisory Personnel for Client Referrals.....	19
Item 15: Custody	20
Item 16: Investment Discretion	20
Item 17: Voting Client Securities (Proxy Voting)	20
Item 18: Financial Information.....	20
A. Balance Sheet	20
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients.....	21
C. Bankruptcy Petitions in Previous Ten Years	21

Item 4: Advisory Business

A. Description of the Advisory Firm

The Investment House LLC is a Limited Liability Company organized in the state of Delaware. The Investment House LLC is a SEC-registered investment advisor with its principal place of business located in Los Angeles, California.

This firm has been in business since May 2012, and the principal owners are Timothy J. Wahl and Jed M. Cohen.

B. Types of Advisory Services

The Investment House LLC (hereinafter “TIH”) offers the following services to advisory clients:

Investment Supervisory Services

TIH offers ongoing portfolio management services based on the individual needs of each client. Through personal discussions in which goals and objectives based on a client's particular circumstances, objectives and risk tolerances are established, we work with the client to develop an individual investment policy and create and manage a portfolio according to that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, liquidity, and funding needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background. Clients are advised to promptly notify TIH if there are changes in their financial situation or investment objectives.

TIH evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. TIH will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

Mutual Fund Management

TIH serves as the investment advisor to The Investment House Growth Fund (the “Fund”), an open-end mutual fund registered under the Investment Company Act of 1940. TIH continuously manages the funds’ assets on a discretionary basis based on the investment goals and objectives as outlined in the Fund’s prospectus.

Interested investors should refer to the Fund’s prospectus and statement of additional Information (“SAI”) for important information regarding objectives, investment, time-horizon, risks, fees and additional disclosures before investing. The prospectus and SAI and other documents are available at www.tihfunds.com or by calling (888) 456-9518. Please read the prospectus and SAI carefully before you invest. The Investment House Growth Fund is distributed by Ultimus Fund Distributors, LLC.

Private Fund Management

TIH serves as the investment advisor to an unaffiliated private fund. TIH continuously manages the funds' assets on a discretionary basis based on the investment goals and objectives as outlined in the investment management agreement. TIH does not direct clients to invest in the private fund. More information can be found in our ADV Part 1A which can be obtained by accessing the SEC's investment adviser public information site at www.adviserinfo.sec.gov.

Services Limited to Specific Types of Investments

TIH generally limits its money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, REITs, and government securities. TIH may use other securities as well, such as options, to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

TIH offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client's individual investment policy which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent TIH from properly servicing the client account, or if the restrictions would require TIH to deviate from its standard suite of services, TIH reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. TIH DOES NOT participate in any wrap fee programs.

E. Amounts Under Management

As 12/31/13, TIH was actively managing approximately \$541 million of client assets.

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Annual Fee
Up to \$1,000,000	1.50%
Above \$1,000,000	1.00%

These fees are negotiable depending upon the needs of the client and complexity of the situation and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in arrears, and clients may terminate their contracts with written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract.. Lower fees for comparable services may be available from other sources.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization incorporated in the Investment Advisory Agreement. Fees are paid quarterly in arrears.

Alternatively, Advisory fees may be invoiced and billed directly to the client quarterly in arrears.

Clients may select the method in which they are billed.

The Adviser may, at its own discretion, waive any or all fees. When fees become due, and for clients who instruct us to debit our fee from their accounts, there may be insufficient liquid assets in those accounts to pay the fee. In some cases, we may sell assets on or before our quarterly fee is due based on our investment judgment that the sale is appropriate. Our quarterly management fee may be paid, in whole or in part, from the sale proceeds. However, there may be circumstances in which an account does not have liquid assets to pay our fee and we do not believe a sale transaction is appropriate. In those cases, among others, we may waive all or part of our fees. Given such discretion, there is the potential for, or the appearance of, the preferential treatment of some clients.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, wire transfer fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by TIH. Please see Item 12 of this brochure regarding broker/custodian.

TIH may invest client assets in shares or similar ownership interests of mutual funds or exchange traded funds ("ETFs"). In addition to the management fee charged directly by TIH, the client would also be paying an indirect management fee to each investment fund in which a client's funds may be invested, except in the case when a client's account assets are invested in The Investment House Growth Fund (the "Fund"), for which TIH acts as an investment advisor. In that case, TIH's advisory fee is not applied to the specific client assets invested in the Fund. The client should refer to the prospectus or offering document for further information which can be obtained by calling 888-456-9518 or online at www.tihfunds.com.

D. Prepayment of Fees

TIH collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

TIH and its supervised persons does not receive compensation for the sale of securities or other investment products, including asset based sales charges or services fees from the sale of mutual funds to its clients.

F. Other Compensation

Clients may authorize TIH to buy securities for their accounts on margin. The decision to engage in margin is typically made as part of an investment and cash management strategy for taxable accounts. Our use of margin is not used as a means to speculate in the securities markets. When TIH buys securities on margin for clients, the margin lender will charge interest on any outstanding margin loan. TIH does not, but certain advisory persons, in their roles as registered representatives of an independent broker dealer who introduces the account to the margin lender, may share in a portion of the margin interest charged to those clients. In addition, when TIH calculates its advisory fee, the fee is applied to the total market value of all assets in client accounts, not net account value. (Net account value equals total market value of all assets in account less margin balance) For these reasons, TIH's potential to earn additional revenue and higher fees and its advisory affiliate's ability to share in a portion of margin interest, represents a conflict of interest by giving TIH or its advisory person, an incentive to increase the amount borrowed for client accounts than otherwise would be the case if margin interest was not shared or securities purchased on margin were excluded from the advisory fee calculation. The decision to engage in margin is discussed with the client prior to its implementation.

The use of margin is considered a speculative technique that involves special risk considerations. Interest costs on borrowings may fluctuate with changing market rates of interest and may partially offset or exceed the return earned on borrowed funds. Interest on borrowings will be an expense of a client account and will affect the investment performance of the account. To the extent a client account is leveraged, the value of its assets will tend to increase more when its portfolio securities increase in value, and to decrease more when its portfolio securities decrease in value, than if its assets were not leveraged.

TIH serves as the investment advisor to The Investment House Growth Fund (the "Fund"), an open-end mutual fund registered under the Investment Company Act of 1940. TIH is paid an investment management fee by the Fund. For certain clients where a separately managed account may not be suitable, TIH may recommend investment in the Fund. This may represent a conflict of interest in that there may be other mutual funds with lower fees and expenses. The fee arrangement, termination, and refund policies are described in the Fund's prospectus and Statement of Additional Information ("SAI"). Portfolio management clients of TIH who also invest in the Fund will pay only those fees charged to investors by the Fund. The value of the client's investment in the Fund is excluded from our quarterly portfolio management fee calculation.

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

TIH does not accept performance-based fees or other fees based on a share of capital gains or capital appreciation of the assets of a client.

Item 7: Types of Clients

TIH generally provides management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Investment Companies
- ❖ Pension and Profit Sharing Plans
- ❖ Private Limited Partnership Fund

Minimum Account Size

A minimum of \$250,000 of assets under management is required for this service, although under certain circumstances this may be negotiable.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Growth Strategy

In making investments for its clients, TIH uses a top down/bottom up approach. TIH first considers macro political, economic, social, and technological factors to identify markets and sectors that TIH considers to be favorable for the long term. In the selection of equities for purchase, the analysis focuses on a review of each investment's fundamental values to find the more favorable investments within the markets and sectors identified.

Balanced

The Balanced Strategy combines our Growth Strategy with an allocation to fixed income assets. TIH considers duration, creditworthiness, and perceptions of the issuer's ability to make payments in the selection of individual fixed income securities and considers the efficiency, diversification, liquidity, and management, if any, in its selection of fixed income mutual funds and ETFs

SRSW Strategy

TIH uses an asset allocation methodology to achieve the strategy's targeted goals. TIH first considers the income, capital appreciation, and volatility goals for the strategy, then selects asset classes which, in combination, TIH believes will help achieve its goals. Thereafter, TIH evaluates the various ETF, closed-end fund and open-end funds alternatives available to implement its asset allocation, in due consideration of efficiency, diversification, liquidity, and management, if any.

Special Situations

TIH looks to take advantage of opportunities which may develop because of temporary market dislocations, corporate events, anomalous securities pricing, and other market or corporate events.

Resources

TIH uses a variety of publicly available investment research and informational resources. Resources include those from Morningstar, Standard and Poor's, Value Line Publishing, Moody's and other nationally known providers; as well as financial newspapers and magazines; research materials prepared by others, along with company annual reports, press releases and filings with the SEC.

Investment Strategies

Growth

The Growth Strategy is an equity based investment strategy designed to achieve long term capital growth by recognizing the key long wave growth themes in the world economy, and finding the best positioned, managed, and capitalized corporate entities driving them. The strategy employs longer holding periods in an effort to compound capital invested, minimize transaction costs and maximize tax efficiency.

Balanced

The Balanced Strategy combines our Growth Strategy with an allocation to fixed income assets, primarily corporate and municipal bonds, mutual funds and ETFs, to achieve a balance of long term capital growth and current income according to a client's desired asset allocation.

SRSW

Our Stay Rich, Sleep Well (SRSW) Portfolio® is an ETF Managed Portfolio strategy, comprised of exchange traded funds, closed-end funds and the occasional open-end fund, designed to create a reliable source of distributable income, and low volatility capital appreciation by using both fixed income and equity assets in combination to achieve a relatively stable return.

Special Situations

The Special Situations strategy is an aggressive, short term strategy, investing primarily in equities and equity options. The strategy is designed to take advantage of opportunities which may develop because of temporary market dislocations, corporate events, anomalous securities pricing, and other market or corporate events which we judge to present potentially favorable risk reward opportunities.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Investment Strategies

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:

- **Manager Risk:** The chance that poor security selection will cause the account to underperform relevant benchmarks or other managers with a similar investment strategy. In addition, significant investment in a financial sector subjects the account to proportionately higher exposure to the risks of that sector.
- **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.

Investors should be aware that investing in securities involves a risk of loss, including the entire investment amount. Frequent trading of an account can impact and reduce the overall rate of return in the account through increased brokerage charges and transaction costs, tax implication, and deviation from asset allocation objectives.

Importantly, there are risks pertaining to the Fund that are outlined in detail in the Fund's prospectus and statement of additional information. It is important for potential investors to fully read the prospectus, statement of additional information before investing.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Mutual Funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns.

Equity Investments: The value of the equity securities are subject to market risk, including changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (unlikely); however, they carry a potential risk of losing share price value.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Exchange Traded Funds (ETF): Investing in ETF's carries the risk of capital loss. Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

REITs have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

Long Options: The purchase of an option involves the payment of a premium and the corresponding right to either purchase or sell the underlying security for a specific price at a certain time or during a certain period. Purchasing options involves the risk that the underlying instrument does not change price in the manner expected, so that the option expires worthless and the investor loses its premium.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. The use of leverage by buying securities on margin is a technique that involves special risk considerations. Interest costs on borrowings may fluctuate with changing market rates of interest and may partially offset or exceed the return earned on borrowed funds. Interest on borrowings will be an expense of a client account and will affect the investment performance of the account. To the extent a client account is leveraged, the value of its assets will tend to increase more when its portfolio securities increase in value, and to decrease more when its portfolio securities decrease in value, than if its assets were not leveraged.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

On July 23, 2012, Jed M. Cohen settled a complaint filed by a prior client at a previous firm that alleged losses in connection with the management of a single discretionary account. Mr. Cohen continues to deny and dispute the allegations asserted, however, all parties acknowledge that continuing to pursue the action would be expensive, time consuming, and uncertain in result for all parties. Further information on this filing can be obtained by accessing the SEC's investment adviser public information site at www.adviserinfo.sec.gov and Mr. Cohen's Form U-4, a summary of which can be found at www.finra.org/brokercheck.

In 1991 Peter Gardiner, without admitting or denying any allegations, settled a civil lawsuit with the Securities and Exchange Commission. The allegations were that Mr. Gardiner violated, and aided and abetted the violations of certain sections and rules of the Securities Act of 1933 and the Securities Exchange Act of 1934. Mr. Gardiner consented to a permanent injunction enjoining him from further violations of such rules and regulations, and a bar from association with any broker, dealer, government securities broker or dealers, investment adviser, Investment Company or municipal securities dealer for three (3) years. Mr. Gardiner's reapplication as a registered representative was approved in 1995. Further information on this filing can be obtained by accessing the SEC's investment adviser public information site at www.adviserinfo.sec.gov and Mr. Gardiner's Form U-4, a summary of which can be found at www.finra.org/brokercheck.

B. Administrative Proceedings

In 1996 the Texas State Securities Board entered an administrative order against Mr. Gardiner for failing to provide information requested by the Texas commissioner regarding his registration application. Mr. Gardiner informed the State of Texas that he was not aware of any registration application or that they had requested any information. Further information on this filing can be obtained by accessing the SEC's investment adviser public information site at www.adviserinfo.sec.gov and Mr. Gardiner's Form U-4, a summary of which can be found at www.finra.org/brokercheck.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Jed M. Cohen is a registered representative of Western International Securities, Inc., a FINRA member broker-dealer.. Clients, however, are not under any obligation to engage him in this capacity when considering the purchase/sale of securities. Additionally, TIH does not, but Mr. Cohen does, in his role as registered representative of an independent broker dealer, introduces the account to the margin lender over which he may share in a portion of the margin interest charged to those clients. In addition, when TIH calculates its advisory fee, the fee is applied to the total market value of all assets in client accounts, not net account value. (Net account value equals total market value of all assets in account less margin balance) For these reasons, TIH's potential to earn additional revenue and higher fees and its advisory affiliate's ability to share in a portion of margin interest, represents a conflict of interest by giving TIH or its advisory person, an incentive to increase the amount borrowed for client accounts than otherwise would be the case if margin interest was not shared or securities purchased on margin were excluded from the advisory fee calculation.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither TIH nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Jed Marshall Cohen is a registered representative of Western International Securities, Inc.. Clients should be aware that any services or products offered through his activities as registered representative pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Mr. Cohen does not offer TIH clients advice or products in this capacity. Clients are in no way required to implement the plan through any representative of TIH in their capacity as a registered representative.

Some of TIH's investment adviser representatives have outside business activities that may create potential conflicts of interest. Details on this activities, the conflicts surrounding the activities, along with how TIH addresses such conflicts are included in each applicable IAR's Form ADV Part 2B (Supplement Disclosure Brochure), which is delivered to clients at the beginning of the relationship and anytime there is a material change to the information contained therein.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

TIH does not utilize nor select other advisers or third party managers. All assets are managed by TIH management.

E. Investment Advisor to a Mutual Fund

As previously disclosed in Advisory Business (Item 4.B) Mutual Fund Management, TIH is the investment advisor to The Investment House Growth Fund, an open-end mutual fund registered under the Investment Company Act of 1940.

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

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

TIH may recommend to clients that they purchase a security that TIH has a material financial interest. This will be disclosed to the client prior to purchase and they will be provided the relevant prospectus that applies to the purchase.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of TIH may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of TIH to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. TIH has adopted policies and procedures designed to detect and prevent such conflicts of interest and, when they do arise, to ensure that it effects transactions for clients in a manner that is consistent with its fiduciary duty to its clients and in accordance with applicable law. In compliance with our Code of Ethics, transactions in certain securities are reviewed quarterly for any conflict of interest or insider trading. In general, TIH invests in liquid, large-cap equities listed on major US exchanges. Therefore the timing of representative's transactions would have an immaterial effect on a subsequent client transaction. Nevertheless, TIH will not execute personal transactions on a day during which orders for that same security are pending for a client until that order is executed or withdrawn, unless the transaction is combined ("blocked") with the client transaction.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of TIH may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of TIH to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. In general, TIH invests in liquid, large-cap equities listed on major US exchanges. Therefore the timing of representative's transactions would have an immaterial effect on a subsequent client transaction. Nevertheless, TIH will not execute personal transactions on a day during which orders for that same security are pending for a client until that order is executed or withdrawn, unless the transaction is combined ("blocked") with the client transaction.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

TIH does not maintain custody of your assets that we manage (although we may be deemed to have custody of your assets if you give us authority to withdraw fees from your account (see Item 15 Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. Clients may select any qualified custodian to maintain all cash and securities in Client's Account. TIH requests that clients use one of the following qualified custodians for custody and transaction execution services:

1. Western International Securities, Inc., ("WIS") a registered broker-dealer and FINRA member firm, clearing through J.P. Morgan Clearing Corp. Certain principals of TIH are also registered representatives of WIS;
2. Fidelity Brokerage Services ("Fidelity"), a registered broker-dealer and FINRA member firm;
3. Charles Schwab & Company, Inc. ("Schwab"), a registered broker-dealer and FINRA member firm.
4. TD Ameritrade, Inc. ("TD Ameritrade"), a registered broker-dealer and FINRA member firm.

Client may choose from these firms for these necessary account services. When Client makes this choice, Client will complete account opening documentation and determine with the selected firm what commission rate will apply to transactions effected in the Account. If a Client does not select one of these custodians, TIH may or may not be able to manage the account, depending on the custodian Client does select.

How We Select Brokers/Custodians to Recommend

We seek to use a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us

1. Research and Other Soft-Dollar Benefits

Western International Securities, Inc.

Western International Securities, Inc., ("WIS") is a registered broker-dealer and FINRA member firm, clearing through J.P. Morgan Clearing Corp ("JPMCC"). If you select WIS, WIS will hold your assets in a brokerage account at JPMCC and buy and sell securities when we instruct them to. While we may request that you use WIS as your broker-dealer, you will decide whether to do so and open your account with WIS by entering into an account agreement directly with them and JPMCC. Certain principals of TIH are also registered representatives of WIS. TIH may receive benefits from WIS including, an electronic interface, online tools, a dedicated trading desk, fund families, JP Morgan research, etc. TIH examined this potential conflict of interest when it chose to enter into the relationship with WIS and has determined that the relationship is in the best interests of TIH's clients and satisfies its client obligations, including its duty to seek best execution. Although TIH will seek competitive rates, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the TIH determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

Fidelity Brokerage Services

TIH has an arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides TIH with Fidelity's "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like TIH in conducting business and in serving the best interests of their clients but that may benefit TIH. Fidelity will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we may request that you use Fidelity as custodian/broker, you will decide whether to do so and open your account with Fidelity by entering into an account agreement directly with them. We do not open the account for you.

Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables TIH to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers.

As part of the arrangement, Fidelity also makes available to TIH, at no additional charge to TIH, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by TIH (within specified parameters). As a result of receiving such services for no additional cost, TIH may have an incentive to continue to use or expand the use of Fidelity's services. TIH examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of TIH's clients and satisfies its client obligations, including its duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the TIH determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although TIH will seek competitive rates, to the benefit of all clients, it may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by TIH will generally be used to service all of TIH clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account. TIH and Fidelity are not affiliates, and no broker-dealer affiliated with TIH is involved in the relationship between TIH and Fidelity.

Charles Schwab & Co., Inc.

Charles Schwab & Co., Inc. (Schwab) is a FINRA-registered broker-dealer and member SIPC. TIH is independently owned and operated and not affiliated with Schwab. If you select Schwab, Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we may request that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you.

Your Custody and Brokerage Costs

For our clients' accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab's commission rates applicable to our client accounts were negotiated based on our commitment to maintain a minimum of our clients' assets statement equity in accounts at Schwab. This commitment benefits you because

the overall commission rates you pay are lower than they would be if we had not made the commitment. In addition to commissions Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

Products and Services Available to Us from Schwab

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as we maintain a minimum of our clients’ assets statement equity in accounts at Schwab. The benefits received by TIH do not depend on the amount of brokerage transactions directed to Schwab.

Here is a more detailed description of Schwab’s support services:

Services that Benefit You

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or some substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients’ accounts; and
- assist with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events

- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

TD Ameritrade, Inc.

TIH participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. TIH receives some benefits from TD Ameritrade through its participation in the program

TIH may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between TIH's participation in the program and the investment advice it gives to its Clients, although TIH receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to TIH by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by TIH's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit TIH but may not benefit its Client accounts. These products or services may assist TIH in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help TIH manage and further develop its business enterprise. The benefits received by TIH or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, TIH endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TIH or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the TIH choice of TD Ameritrade for custody and brokerage services.

2. Brokerage for Client Referrals

TIH receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

A Client may direct TIH to utilize a particular broker-dealer to execute some or all transactions for the Client's account. In those circumstances, the Client is responsible for negotiating the terms and arrangements (including, but not limited to, commission rates) relating to all services to be provided to the account by that broker-dealer. TIH will not be able to seek better execution services or prices from other broker-dealers or be able to aggregate the Client's transactions, for execution through other brokers-dealers, with orders for other accounts managed by TIH. As a result, TIH may not obtain best execution on behalf of the Client, who may pay materially disparate commissions, greater spreads or other transaction costs, or receive less favorable net prices on transactions for the account than would otherwise be the case.

B. Aggregating (Block) Trading for Multiple Client Accounts

TIH may, in its sole discretion, aggregate "block" purchases or sales across client accounts. Although such concurrent aggregations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they will be effected only when the TIH believes that to do so will be in the best interest of the affected accounts and is consistent with the duty to seek best execution. Block trading may allow us to execute trades in a timelier, more equitable manner, at an average share price. Trades for some client accounts may be executed through a different custodian/broker-dealer than trades for other client accounts depending on the custodian/broker-dealer selected by the individual client. Thus, trades for accounts held at different custodians/broker-dealers may be executed at different times and different prices. Since transaction costs are determined individually between the client and their selected custodian/broker dealer, aggregating transactions across client accounts generally will not result in any reduced transactions costs.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least quarterly by Timothy Wahl and Jed M. Cohen. Client accounts of Wayne Woodman, Steven Steinberg, Glenn Goodstein and Peter Gardiner are reviewed by each respectively with the assistance of Mr. Wahl and Mr. Cohen. Timothy Wahl and Jed M. Cohen are primary portfolio managers and Wayne Woodman, Steven Steinberg and Glenn Goodstein are Investment Advisor Representatives and together review clients' accounts

with regards to their investment policies and risk tolerance levels. All respective accounts at TIH are assigned to these reviewers.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, by client additions or withdraws of assets or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written statement that details the client's account including assets held and asset value which will come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

TIH does not receive any economic benefit, directly or indirectly from any third party for advice rendered to TIH clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

TIH has entered into and in the future may enter into contractual agreements ("solicitation agreements") with individuals and organizations, some of whom may be affiliated or unaffiliated with us, that solicit clients on our behalf. All such agreements are made in writing and comply with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940 (the "Act"). While the specific terms of each solicitation agreement may differ, generally, a solicitor's compensation is based upon our engagement of new clients and the retention of those clients and is calculated using a varying percentage interest in the fees paid to us by such clients. In all solicitation agreements, each solicitor must represent that they have not been: 1) subject to an order of the Securities and Exchange Commission issued under Section 203(f) of the Act, 2) convicted within the last ten years of any felony or misdemeanor involving conduct described in Section 203 (e)(2)(A) - (D) of the Act, 3) found by the Commission to have engaged, or convicted of engaging, in any of the conduct specified in paragraphs (1), (5) or (6) of Section 203(e) of the Act; nor 4) subject to an order, judgment or decree described in Section 203(e)(4) of the Act. Each solicitor must agree to advise TIH immediately of any change in such representations. In addition, the solicitor is to provide the prospective client with a copy of our Brochure (Form ADV Part 2A), in addition to a document disclosing the solicitation arrangement, including the compensation that the solicitor is receiving from TIH. Such disclosure document must be signed by each referred client, whereby they acknowledge receipt of our Brochure and the written document. Note that in a majority of the states, a solicitor is also required to be qualified and registered as an investment adviser representative.

Item 15: Custody

Client's funds and securities will be maintained with a "qualified custodian" as required under SEC Rule 206(4)-2, and TIH will not act as custodian of any client's funds or securities. However, due to its ability to deduct fees, with client written authority, directly from client accounts, TIH is considered to have custody of client funds and securities under Rule 206(4)-2. Each client will receive, at least quarterly, an account statement directly from the custodian and billing invoices, as required in each jurisdiction, from TIH and should carefully review all statements and invoices for accuracy.

Item 16: Investment Discretion

For those client accounts where TIH provides ongoing supervision, the client has given TIH written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides TIH discretionary authority in the Investment Advisory Contract and limited trading authority in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

TIH upon request will accept voting authority for client securities in certain cases. When TIH does accept voting authority for client securities, it will always seek to vote in the best interests of its clients. TIH does not maintain pre-approved voting guidelines but relies on the portfolio manager to determine the appropriate course of action in voting client securities that is in the best interest of the client. Clients may direct TIH on how to vote client securities by communicating their wishes in writing or electronically to TIH. When voting client proxies the TIH will always hold the interests of the clients above its own interests. Clients of TIH may obtain the voting record of TIH on client securities by contacting TIH at phone number or e-mail address listed on the cover page of this brochure. Clients may obtain a copy of TIH's proxy voting policies and procedures upon request.

Item 18: Financial Information

A. Balance Sheet

TIH does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither TIH nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

TIH has not been the subject of a bankruptcy petition in the last ten years.