



## **LeafHouse Financial Advisors, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 19, 2015**

This Disclosure Brochure provides information about the qualifications and business practices of LeafHouse Financial Advisors, LLC ("LeafHouse"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (512) 879-1505.

LeafHouse is a registered investment advisor with U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about LeafHouse to assist you in determining whether to retain the Advisor.

Additional information about LeafHouse and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of LeafHouse.

LeafHouse believes that communication and transparency are the foundation of its relationship and continually strive to provide its Clients with the complete and accurate information at all times. LeafHouse encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last distribution to clients.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of LeafHouse.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information for LeafHouse:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Firm** and enter **149694** (our firm’s CRD number) in the field labeled “Firm Name or CRD# or SEC#”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (512) 879-1505.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

LeafHouse Financial Advisors, LLC (“LeafHouse”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is located in the state of Texas. LeafHouse is a limited liability company formed under the laws of the State of Texas that conducts business in Texas and other states. LeafHouse is owned by LeafHouse Financial Group, LLC (which is owned by Todd Kading and Neal Weaver, both as Managing Members).

### **B. Advisory Services Offered**

LeafHouse offers investment advisory services to individuals, high net worth individuals, businesses, retirement plans and other financial professionals in Texas and other states (each referred to as a “Client” and also referred to as “you” or “your”).

#### Financial Planning Services

LeafHouse provides comprehensive financial planning and consulting services. A financial plan may include a review of a Client’s net worth (including assets and liabilities), objectives, risk tolerance, risk capacity, cash flow and expenses, income tax analysis, review and analysis of fringe benefits, retirement forecast and probability analysis, educational funding analysis, estate planning analysis and risk management review. LeafHouse’s approach to providing this service starts with gathering the Client’s current financial and subjective information. LeafHouse assesses the Client’s goals, objectives, time horizon, and risk tolerance to compare where the Client is today in relation to the attainment of their stated goals. A comprehensive financial plan thereafter is prepared to discuss the Client’s situation, along with various alternatives for consideration. At the end of the processes, the Client will receive education about the alternatives recommended.

In performing its services, LeafHouse entrusts that the Client will provide accurate information and LeafHouse will not be obligated to verify any information received from the Client or from the Client’s other professionals. If requested by the Client, LeafHouse may recommend the services of other professionals for purposes of implementing the plan. The Client is under no obligation to engage the services of any such recommended professional. The Client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation from LeafHouse. Moreover, Clients are advised that it remains their responsibility to promptly notify LeafHouse if there is ever any change in their financial situation during the financial planning process.

#### Investment Advisory Services

LeafHouse provides continuous, active management of Client investment portfolios. LeafHouse has developed a client service model that includes discovery, implementation and monitoring components.

- **Client Discovery** – Upon entering into an advisory agreement with LeafHouse will begin a process of Client discovery. LeafHouse seeks to uncover a Client’s investment objectives, their tolerance and capacity for risk, as well as other issues. LeafHouse will also collect information concerning the Client’s financial status, and assets, among other things.
- **Investment Policy Statement** – Based on the information provided by the Client, LeafHouse will furnish the Client with an “Investment Policy Statement”, as necessary, which summarizes the Client’s current investment portfolio, investment goals and objectives, and risk tolerance level. Working with the Client, LeafHouse will craft an investment plan for the Client.

- **Investment Selection and Implementation** – Upon completion of this investment profile information LeafHouse will implement an investment plan for the Client and select an investment portfolio. LeafHouse may invest Client assets in a variety of instruments in order meet Client investment objectives. All investments are made with the Client’s risk tolerance in mind. LeafHouse may invest in stocks, bonds, options, mutual funds, or any other marketable security as deemed appropriate by LeafHouse.
- **Investment Monitoring and Maintenance** – LeafHouse will monitor investment portfolios to ensure that the portfolio meets the Client’s goals and objectives as well as appropriate benchmarks. Further, LeafHouse monitors each Client portfolio in order to ensure they are invested in accordance with LeafHouse’s firm-wide investment guidance and economic outlook.

It is the Client’s responsibility to notify LeafHouse promptly of any change to the information provided by the Client, including any change to any investment objectives, risk tolerance, investment time horizon, and any investment policies, guidelines or reasonable restrictions. When providing Advisory Services to its clients, LeafHouse will honor Client restrictions unless those restrictions impair LeafHouse’s ability to manage Client assets.

#### Business and Nonprofit Retirement Plans

LeafHouse will work with business and nonprofit Clients to develop, design and implement a retirement savings plan for its employees. LeafHouse provides objective financial advice to plan sponsors and senior management regarding issues involving benefit plan options, wealth accumulation strategies for employees and participant education. LeafHouse will evaluate a sponsor’s current plan and recommend changes, if necessary. LeafHouse may also provide consulting regarding new plans for companies that have not previously offered retirement plan benefits.

#### *Non- Fiduciary Services for Retirement Plans*

- **Monitoring and Reporting Key Metrics** – Monitoring investments is an essential part of discharging your fiduciary responsibilities. Performance monitoring and reporting can assist you in making sure your investment decision-making is in line with your investment policy. We assist you by tracking key metrics to confirm investment performance adheres to your Investment Policy Statement, identifying any areas of concern, and recommending changes as necessary.
- **Ongoing Fiduciary Governance** – If you are to have sound fiduciary discharge of your duties, you must establish a sound fiduciary governance system. We help you develop and implement the optimal organization and governance design for your plan.
- **Vendor Search & Selection** – Selecting your 401(k) vendor is a serious fiduciary obligation. We will assist in you developing your selection methods, guide you through the evaluation process, provide you a written recommendation, and help you manage the implementation process once you’ve made your decision.
- **Fee Assessment/Negotiation** – As an ERISA fiduciary you have an obligation to ensure that your plan’s fees and expenses are reasonable in light of the level and quality of services being provided. Typically, plan sponsors lose track of the total plan expenses. We help you uncover and document all the fees (both obvious and difficult) associated with your plan and recommend specific steps you can take to

reduce those fees, if applicable. When appropriate, we will assist you in negotiating the fee arrangements.

- **Education of Employees** – In order to fulfill your fiduciary duties to your plan participants (and in order to provide a valuable benefit for your employees), you need to have a benefits education structure in place. We will assist in providing both online and on-site education for your organization.

### ***Fiduciary Services for Retirement Plans***

**Development of an Investment Policy Statement Development** – A written investment policy statement is the only way to demonstrate a thoughtful process that helps ensure that investment decisions are prudent and well informed. We help you develop your overall investment policy approach and create your Investment Policy Statement, which describes the procedures and metrics used to manage the investment process.

**Initial Selection and On-going Monitoring of the Plan's Designated Investment Alternatives ("DIAs")** – Once the IPS is approved by the Client, LHFA will review the investment options available to the Plan and will utilize qualitative and quantitative analysis to provide the Client with recommendations regarding the Plan's DIAs that meet the criteria set forth in the IPS.

**Creation and Maintenance of Model Asset Allocation Portfolios ("Model Portfolios")** – If the Client desires the addition of Professional portfolio modeling for the plan participants, we may allocate among the Plan's approved DIAs or other funds to create the following four (4) risk-based Model Portfolios to be offered to Plan participants through the Record-keeper's platform:

1. Conservative
2. Moderately Conservative
3. Moderately Aggressive
4. Aggressive

**Qualified Default Investment Alternative ("QDIA") Management** – If the Client desires, we will pick an appropriate QDIA for the plan. This investment will fit within the Department of Labor's guidance for such a choice.

### **Investment Management RAMP Model Programs**

LeafHouse manages investment model portfolios through its "RAMP Model Program". RAMP investment strategies are offered to individual Clients as well as through other financial professionals. Investments in RAMP models are allocated and repositioned over time based on a Client's specific strategic allocation and tactical allocation adjustments. Clients are offered a RAMP model based on this investment objectives and tolerance for risk and include investments in mutual funds, exchange traded funds and other investment products.

Investors may be offered these strategies through independent financial professionals, which will served as your relationship manager and assist with selecting an appropriate strategy based on an investor's financial situation, investment objectives and risk tolerance. The RAMP Model Program may also be offered to you through an unaffiliated broker-dealer or investment adviser as part of their investment products which may include self-directed 401(k) brokerage assets and/or retirement plan assets such as 403(b) and 457s plans.

Investors will enter into an investment advisory agreement with LeafHouse that defines the scope and terms the advisory relationship. This agreement will tell us which RAMP Model Program(s) you are selecting and authorize us with discretionary authority to allocate your account into the investment positions of the RAMP

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Model Program(s) you have selected and to continue to make reallocations according to the selected strategy. Clients may impose reasonable restrictions on LeafHouse Financial Advisors' management of your accounts. In addition, Clients may also hold non-managed securities in your account, depending on the arrangement with your financial professional. You or your financial representative can contact us at any time to inquire on the status of your account. From time-to-time, LeafHouse Financial Advisors may hire one or more subadvisors to help manage the RAMP Model Programs. Additional information is provided in *Item 10* of this document.

**Prior to rendering investment management services, LeafHouse will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective(s).**

### **C. Client Account Management**

#### LeafHouse Managed Assets

Prior to engaging LeafHouse to provide investment advisory services, the Client is required to enter into an investment management agreement with LeafHouse setting forth the terms and conditions of the engagement and the services to be provided. These services will include:

- **Determining Portfolio Asset Allocation** – LeafHouse will formulate a long-term asset allocation strategy that specifies the percentage of assets to be invested between equity, fixed-income securities and money market funds.
- **Asset Allocation Recommendation** – LeafHouse will implement its recommended investment plan via an asset allocation model. Generally, portfolio management is done on a discretionary basis. Non-discretionary services are also available. LeafHouse will use the services of a discount broker-dealer to provide account custodial services and to affect trades.
- **Ongoing Investment Monitoring** – LeafHouse provides ongoing oversight of the Client's investment program. All investments are monitored for performance relative to certain benchmarks and LeafHouse expectations.

All portfolios are rebalanced as necessary upon LeafHouse review. More or less frequent rebalancing may be required depending on macroeconomic, market or sector factors.

#### Third-Party Managed Assets

In certain cases LeafHouse and the Client may decide portfolio management by an Independent Manager is in the Client's best interest. In those cases, LeafHouse will work with the Client to determine the most suitable program in which the Client will invest. In selecting the appropriate Independent Manager, LeafHouse will adhere to the following process:

- **Determining an Investment Plan** – LeafHouse will formulate a long-term asset allocation strategy that specifies the percentage of assets to be invested between equity, fixed-income securities and money market funds.
- **Selecting an Independent Manager** – Some Clients may require a highly focused investment style and/or investment strategy to best meet their goals. LeafHouse will access highly regarded portfolio managers throughout the country to specialize in particular investment styles, strategies and asset classes.



- **Ongoing Investment Monitoring** – LeafHouse provides ongoing oversight of the Client’s investment program, whether managed by LeafHouse or by a third-party. All investments are monitored for performance relative to certain benchmarks and LeafHouse expectations.

All portfolios are rebalanced as necessary upon LeafHouse review. More or less frequent rebalancing may be required depending on macroeconomic, market or sector factors.

**Alternative Investments** – For certain Clients, LeafHouse may recommend investment in alternative investments. These alternative investments are generally organized as limited partnerships and available to certain sophisticated investors. Interests in alternative investment partnerships will be sold only to persons who are “accredited investors” as defined in Regulation D under the Securities Act of 1933, as amended and “qualified clients” as defined in Rule 205-3 under the U.S. Investment Advisers Act of 1940.

Prior to a Client investing, LeafHouse will ensure that such Client is an Accredited Investor and a Qualified Client and will provide the Client with the Partnership’s offering memorandum. For additional information regarding the alternative investments, please see Item 8 below.

#### **D. Wrap Fee Programs**

LeafHouse does not manage any proprietary wrap fee programs. However, as discussed above, LeafHouse may engage Independent Managers to manage Client assets.

#### **E. Assets Under Management**

As of December 31, 2014, LeafHouse manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$485,300,000
Non-Discretionary Assets	\$52,800,000
<b>Total</b>	<b>\$538,100,000</b>

Clients may request more current information at any time by contacting the Advisor.

In addition, LeafHouse has consulted on various retirement plans valued in the hundreds-of-millions of dollars; however, because of the nature of the consulting and our interpretations of current regulations we do not consider these assets to be directly managed by LeafHouse.

### **Item 5 – Fees and Compensation**

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an investment advisory agreement that details the responsibilities of LeafHouse and the Client.

#### **A. Fees for Advisory Services**

##### Investment Advisory Services

LeafHouse’s fee for investment advisory services varies based on the amount of assets managed by LeafHouse. Typically, fees are a fixed percentage of the assets under management. This fee includes all investment recommendations and portfolio implementation, unless the client contract states otherwise. Investment Management clients fees will generally adhere to the following table.



The fees for investment advisory services will range between 0.25% and 2.00%. The fee will be negotiated by LeafHouse and the Client, and will be based on a variety of factors, including; size of the portfolio, complexity of the Client's situation, portfolio restrictions, reporting requirements, among other factors.

#### RAMP Model Programs

The fees for Investment Management RAMP Model Programs will range between 0.35% and 0.15%, depending on the size of the Client's account and specific arrangements with financial professionals. The fee will be negotiated at the sole discretion of the Advisor.

#### Business and Nonprofit Retirement Plans

The fees for ERISA Fiduciary Services for Retirement Plans will be between 0.05% and 0.75%. The fee will be negotiated by LeafHouse and the Client, and will be based on a variety of factors, including; number of participants, location of participants, size of plan assets, complexity of the Client's situation, portfolio restrictions, reporting requirements, among other factors. LeafHouse may also negotiate a flat fee for these services. Fees will generally be between \$4,000 and \$75,000.

All securities held in a portfolio managed by LeafHouse will be independently valued by the custodian. LeafHouse will not have the authority or responsibility to value portfolio securities.

#### Planning and Consulting Services

LeafHouse's fee for planning and consulting services varies based on the services selected by the client. Typically, fees are a fixed dollar amount. This fee includes the preparation and presentation of a financial plan, as described in the client agreement. For certain services, Clients may request certain tasks of LeafHouse for a contract year. Fees will generally be \$500 to \$10,000.

#### Hourly-Based Fee

LeafHouse may render services on an hourly-fee basis. The fee for hourly services is \$200-\$400/hour. Prior to engaging LeafHouse on an hourly basis LeafHouse will provide an estimate of hours necessary to complete a project. Hourly fees are recorded during the project work and the Client will receive an invoice for the fee.

### **B. Fee Billing**

#### Asset-Based Fee

Fees are a fixed percentage of assets under management, based upon the account value on the last day of the prior quarter. Fees for investment management services vary depending on the amount of assets to be managed. Clients are invoiced quarterly in advance or in arrears, depending on the specific service model chosen. In all cases, the terms of the Client's fee and billing arrangements will be agreed to in writing. For accounts opened during the quarter fees will be prorated to cover only that period which the account was managed by LeafHouse.

Asset-based management fees will be automatically deducted from the client account[s] by the custodian. LeafHouse shall send a quarterly invoice to the custodian indicating the amount of the fees to be deducted from the Client Account. The amount due is calculated by applying the annual rate in the table above to the total assets under management with LeafHouse at the end of each quarter. Each billing will be for a single quarter, paid in advance or arrears. Clients will receive independent statements from the custodian no less frequently than quarterly. It is the responsibility of the client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility.

### Planning and Consulting Fees

Once the flat-fee for a Client is determined, LeafHouse may bill up to 50% of the fee in advance of commencing any project work. The balance of the fee is due upon completion of the work agreed to by contract.

### Hourly-Based Fee

Clients paying by an hourly fee will be monthly, or upon completion of the work agreed to by contract. Hourly fees are documented during the project work and the Client will receive an invoice for the fee. LeafHouse may bill up to 50% of the fee in advance of commencing any project work.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than LeafHouse, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The investment advisory charged by LeafHouse is separate and distinct from these custodian and execution fees. In addition, all fees paid to LeafHouse for Investment Advisory Services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in certain investments, without the services of LeafHouse, but would not receive access to Advisor and Institutional shares classes. The Client also would not receive the services provided by LeafHouse which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund(s) and the fees charged by LeafHouse to fully understand the total fees to be paid.

### **D. Advance Payment of Fees and Termination**

#### Advance Fees

As noted, above, LeafHouse is compensated for certain services in advance of completing the work for which LeafHouse was engaged, and certain third-party asset managers may charge fees in advance. Clients may request to terminate their agreement with LeafHouse, in whole or in part, by providing advance written notification. The Client shall be responsible for all earned fees up to and including the effective date of termination. LeafHouse will refund any unearned, prepaid fees, based on the percentage of work not completed under the terms of the agreement. The Client's agreement with LeafHouse is non-transferable without Client's written approval.

#### Termination

Clients may request to terminate their investment advisory agreement with LeafHouse, in whole or in part, by providing advance written notice to LeafHouse. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. LeafHouse will refund any unearned, prepaid fees, if any. The Client's Investment Management Agreement with LeafHouse is non-transferable without Client's written approval.

Clients may terminate the Investment Management Agreement without penalty (full refund or no fees due) within 5 business days of signing the Agreement if the LeafHouse Form ADV Part 2 was not delivered at least 48 hours prior to client's execution of the Agreement.

### **E. Compensation for Sales of Securities**

LeafHouse does not receive commissions or any compensation for transactions in any Client account. As a fee-only advisor, LeafHouse is paid only on the advice and investment management provided to Clients based on the assets under management in the Client's account[s].

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

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LeafHouse does not charge performance-based fees for its investment advisory services. The fees charged by LeafHouse are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

LeafHouse does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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LeafHouse offers investment advisory services to individuals, high net worth individuals, retirement plans, businesses and other financial professionals in Texas and other states (each referred to as a “Client”). The relative percentage each type of Client is available on LeafHouse’s Form ADV Part 1. These percentages will change over time. LeafHouse generally does not impose a minimum account size for establishing a relationship.

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

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### **A. Methods of Analysis**

Fundamental Analysis – Generally, LeafHouse uses Fundamental Analysis in making investment decisions with respect to investments in equities, options and fixed-income instruments. Fundamental Analysis is the process of looking at economic and business indicators as investment selection criteria. These criteria are usually ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. LeafHouse considers macroeconomic factors as well as issue specific factors.

Macroeconomic factors considered by LeafHouse include, but are not limited to; general economic conditions, inflation trends, interest rates and the yield curve, market volatility and trends, and the monetary policies and legislative actions of certain countries.

Issue specific factors include, but are not limited to; earnings, cash flow, growth estimates and trends, management strength and stability and the issuer’s credit rating.

Companies are deemed suitable for investment when they meet certain criteria to indicate that they are an otherwise strong firm, but for a variety of reasons, the value of the stock has been discounted by the broad market. Generally, LeafHouse seeks to invest in companies selling at a discount to their intrinsic value. This method is known generally as “value investing”.

Technical Analysis – Technical analysis is used for analyzing various economic and market trends. These trends, both short- and long-term, are used for determining specific trade entry and exit points and broad economic analysis. These trends may include put/call ratios, pricing trends, moving averages, volume, changes in volume, among many others. These indicators do not speak to the financial health of a particular issuer. Rather, indicators are used to gauge market sentiment regarding a given issue. Technical analysis will be used primarily for the timing of a particular trade, and not security selection.

Investment Manager Due Diligence – LeafHouse generally invests its Clients’ assets with independent managers that pursue investment approaches that are diversified among multiple strategies, asset classes, regions, industry sectors and securities. In selecting an Independent Manager and allocating assets to them, LeafHouse considers both quantitative and qualitative factors including:

- Relative performance during various time periods and market cycles
- Industry reputation
- Experience and training of staff investment professionals
- The clarity of, and adherence to, a viable investment philosophy
- Risk management process
- Portfolio management capabilities
- Fee structure
- Any other factor deemed appropriate by LeafHouse

LeafHouse may use various databases of information in order to facilitate the discovery process on each investment manager utilized by LeafHouse.

Alternative Investments – LeafHouse provides advice to certain accredited investors relative to prospective investments in private investment limited partnerships, or other similar entities, such as hedge funds, fund of fund hedge funds, private equity funds and venture capital funds. These funds are offered in accordance with Regulation D of the Securities Act of 1933. Investment in these types of investments is limited to certain accredited investor Clients.

Alternative investment due diligence is similar to mutual fund due diligence, outlined above. However, given the relatively unregulated nature of these investments, additional emphasis is placed on operational aspects to ensure the independent oversight of the fund being analyzed. As noted above, LeafHouse generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. LeafHouse will typically hold all or a portion of a security for more than a year, but for adjustments made for purposes of rebalancing the portfolio. At times, LeafHouse may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

Cyclical Investing – Cyclical investing is an investing theory that certain companies/sectors tend to respond to economic conditions in predictable ways. Cyclical stocks are highly correlated with the market and general economic conditions. For example, if the economy is weak and consumers are not spending money, cyclical stocks prices will tend to trend down ward. As the economy moves through various conditions, so too will the cyclical companies. Some companies are known as counter-cyclical companies. These are companies that tend to move contrary to prevailing economic conditions. LeafHouse will analyze general market economic and market conditions, look for directional trends, and invest in companies expected to perform well under forecasted conditions.

## **B. Investment Strategies**

LeafHouse structures portfolios using the various methodologies described above. Using a proprietary methodology, LeafHouse believes that Clients will benefit from having a portfolio of holdings invested in a variety of assets classes. To the extent that these asset classes are non-correlated, the portfolio will experience investment returns with mitigated risk.

LeafHouse generally does not maintain any fixed portfolios or strategies. Rather, each Client situation is assessed on an individual basis, and the appropriate investment program is implemented that best meets Client needs. LeafHouse will not pursue strategies that are speculative in nature. LeafHouse will not pursue strategies that are highly speculative in nature.

### C. Risk of Loss

General Investment Risks – Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. LeafHouse will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account[s]. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

LeafHouse generally employs investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts.

Alternative Investments – Alternative investment products may have certain risk characteristics not found in exchange traded securities and mutual funds. These risks may include (but not necessarily found in all funds):

- High degree of risk
- Leverage
- Speculative investment practices
- Illiquidity
- No periodic valuation information
- Complex tax structures or delays in distributing important tax information
- Loose regulatory oversight
- High fees
- Underlying investments may be not transparent

Alternative investment performance can be volatile. An investor could lose all or a substantial amount of their investment. Often, alternative investment fund and account managers have total trading authority over their funds or accounts; the use of a single Advisor applying generally similar trading programs could mean lack of diversification and, consequently, higher risk. There is often no secondary market for a Client's interest in alternative investments, and none may develop. There may be restrictions on transferring interests in any alternative investment. Alternative investment products can execute a substantial portion of their trades on non-U.S. exchanges. Investing in foreign markets may entail risks that differ from those associated with investments in U.S. markets. Clients are encouraged to read the offering memorandum issued by a private investment before investing.

Other Risks - Please remember that different types of investments involve varying degrees of risk, including the possible loss of principal and that past performance may not be indicative of future results. Therefore, it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies undertaken by LeafHouse0 will be profitable.

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving LeafHouse or any of its employees.** LeafHouse and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **149694** in the field labeled “Firm Name, CRD Number or SEC Number”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

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

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### Insurance Agency Affiliations

Certain Advisory Persons of LeafHouse are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from their roles within LeafHouse. As insurance professionals, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products he sells. Some compensation may be in the form of sales incentives. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies, which Clients should be aware. Clients are under no obligation to purchase any products recommended by LeafHouse employees when acting as independent insurance agents.

### Retirement Advisor Management Partnership (RAMP)

LeafHouse Financial Advisors also manages the Retirement Advisor Management Partnership (“RAMP”). RAMP is a network of various financial advisors, registered representatives, registered investment advisors, agents, and third party administrators. All RAMP network advisors share the common goal of providing superior service and outcomes to both retirement plan sponsors and participants. Currently the network is comprised of over 50 advisors and staff, all managing well over \$1.5 billion in assets.

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

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### **A. Code of Ethics**

LeafHouse has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with LeafHouse. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. LeafHouse and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of LeafHouse associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (512) 879-1505.

### **B. Personal Trading with Material Interest**

LeafHouse allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. LeafHouse does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. LeafHouse does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

LeafHouse allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal



securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

#### **D. Personal Trading at Same Time as Client**

While LeafHouse allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards.

**At no time, will LeafHouse or any associated person of LeafHouse, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

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#### **A. Recommendation of Custodian[s]**

LeafHouse does not have discretionary authority to select the broker-dealer/ custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize LeafHouse to direct trades to this custodian as agreed in the investment advisory agreement. Further, LeafHouse does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where LeafHouse does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by LeafHouse. LeafHouse may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. LeafHouse does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

LeafHouse typically recommends to non-retirement plan Clients that they established their brokerage account[s] at Fidelity Institutional Wealth Services ("Fidelity"). Fidelity is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. Fidelity offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. LeafHouse receives some benefits from Fidelity through its participation in the program. LeafHouse considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided. LeafHouse is not affiliated with, or related to, Fidelity.

Following are additional details regarding the brokerage practices of the Advisor:

- 1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **LeafHouse does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
- 2. Brokerage Referrals** - LeafHouse does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
- 3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where LeafHouse will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account[s]) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, LeafHouse will not be obligated to select competitive bids on securities transactions and does not



have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

#### **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. LeafHouse will execute its transactions through an unaffiliated broker-dealer selected by the Client. LeafHouse may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

### **Item 13 – Review of Accounts**

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#### **A. Frequency of Reviews**

##### Financial Planning Clients

Financial plans are reviewed on an as needed basis. Reviews may be more or less frequent depending on each Client's situation and financial circumstances.

##### Investment Advisory Clients

Accounts are monitored on an ongoing basis by LeafHouse for adherence to investment strategy and Client Objective. Investment management and supervision over the securities contained in the Client's portfolio are performed in an ongoing basis by LeafHouse, as applicable.

#### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify LeafHouse if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

#### **C. Review Reports**

##### Financial Planning Reports

Financial plans are reviewed and updated at least annually. LeafHouse will provide financial planning Clients a report summarizing LeafHouse's recommendations and any action required by the Client.

##### Investment Portfolio Reports

The Client will receive brokerage statements no less than quarterly from the Trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s].

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

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#### **A. Compensation Received by LeafHouse**

LeafHouse may enter into referral agreements with Independent Managers under which the Independent Managers pay a fee to LeafHouse for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended. The Independent Managers have agreed to pay LeafHouse a percentage of the revenue

generated from the assets of Clients introduced to the Independent Managers by LeafHouse. This fee percentage will be a fixed percentage of the total fees generated by the Client. Clients referred to Independent Managers will not be charged an amount in addition to the LeafHouse management fee, nor will they be charged a higher management fee than other clients to cover the cost of solicitation of their accounts.

#### **B. Client Referrals from Solicitors**

LeafHouse may enter into referral agreements with third-party advisors (herein "Solicitors") under which LeafHouse pays a fee to a Solicitor for client referrals as permitted by Rule 206(4)-3 of the Advisers Act. LeafHouse has agreed to pay the respective Solicitor a percentage of the revenue generated from the assets of Clients introduced to LeafHouse by the Solicitor. This fee percentage will be a fixed percentage of the total fees generated by the Client. Clients referred to LeafHouse will not be charged a higher management fee than other clients to cover the Solicitor's fee.

### **Item 15 – Custody**

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LeafHouse does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees, where applicable. All Clients must place their assets in a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct LeafHouse to utilize that custodian for the Client's security transactions. For more information custodians and brokerage practices, see *Item 12 - Brokerage Practices*.

While LeafHouse does not have custody of Client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds Client assets. In certain jurisdictions this may be deemed constructive custody. Prior to permitting direct debit of fees each Client provides written authorization permitting fees be made direct from the custodian. LeafHouse will send the Client and the custodian a bill showing the amount of the fee and the way in which it was calculated. The custodian sends every Client an account statement not less than quarterly showing all account activity, including the amounts disbursed from the account to LeafHouse.

### **Item 16 – Investment Discretion**

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#### **Discretionary Portfolio Management**

LeafHouse generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by LeafHouse. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Management Agreement containing all applicable limitations to such authority. All discretionary trades made by LeafHouse will be in accordance with each Client's investment objectives and goals.

#### **Non-Discretionary Portfolio Management**

Non-discretionary portfolio management is understood to mean the LeafHouse must first get Client permission before placing any trades to buy or sell securities in a Client account. LeafHouse is free to determine the timing of a particular transaction; however, permission must first be obtained from the Client. Clients should be aware that delays in granting permission for a transaction may hinder LeafHouse's ability to effectively manage a portfolio.

## **Item 17 – Voting Client Securities**

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LeafHouse does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither LeafHouse, nor its management have any adverse financial situations that would reasonably impair the ability of LeafHouse to meet all obligations to its Clients. Neither LeafHouse, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. LeafHouse is not required to deliver a balance sheet along with this Disclosure Brochure as the firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance.



## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Todd A. Kading  
Managing Director and Chief Compliance Officer**

**Effective: March 19, 2015**

This Brochure Supplement provides information about the background and qualifications of Todd A Kading (CRD# 3070933) in addition to the information contained in the LeafHouse Financial Advisors, LLC (“LeafHouse”) Brochure. If you have not received a copy of this Brochure or if you any questions about the contents of the LeafHouse Brochure or this Brochure Supplement, please contact us at (512) 879-1505.

Additional information about Todd A. Kading is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Todd A. Kading is the Managing Director and Chief Compliance Officer of LeafHouse. Todd Kading, born in 1974, is dedicated to advising Clients of LeafHouse. Mr. Kading earned a Bachelors in Business Administration from Texas State University at San Marcos in 1997. Additional information regarding Mr. Kading's employment history is included below.

### Business Background:

Managing Director and Chief Compliance Officer, LeafHouse Financial Advisors, LLC	2009 to Present
Managing Director, LeafHouse Financial Group, LLC	2008 to Present
Agent, Riversource Life Insurance Co.	2006 to 2008
Senior Financial Advisor, Ameriprise Financial Services, Inc.	2005 to 2008
Senior Financial Advisor, American Express Financial Advisors, Inc.	1998 to 2005

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Mr. Kading.** Mr. Kading has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kading.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kading.**

However, we do encourage you to independently view the background of Mr. Kading on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter 3070933 in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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Insurance Agency Affiliation – Todd A. Kading is an insurance representative of various insurance companies. In this capacity Todd A. Kading may receive customary commissions, and other related revenues from the sale of insurance products. Some of these revenues may come in the form of sales incentives, and most cause the employee to have a conflict of interest in recommending these various insurance companies in any capacity.

Further, Todd A. Kading's affiliation with various insurance companies may create certain conflicts of interest in recommending products of the insurance companies, which Todd A. Kading represents. Clients are under no obligation to purchase any insurance products from Todd A. Kading or the various insurance companies he represents.

## Item 5 – Additional Compensation

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Except as noted above, Mr. Kading is compensated solely by LeafHouse for the services provided to Clients. Mr. Kading does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of LeafHouse.

## Item 6 – Supervision

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Mr. Kading serves as a member of the executive management team, investment advisory representative, as well as supervising all compliance and certain operational and administrative functions. Certain operational and administrative functions are outsourced to responsible third parties. Mr. Kading's full contact information is included on the cover of this Brochure Supplement.

LeafHouse has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of LeafHouse. Further, LeafHouse is subject to regulatory oversight by various agencies. These agencies require registration by LeafHouse and its employees. As a registered entity, LeafHouse is subject to examinations by regulators, which may be announced or unannounced. LeafHouse is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.



## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Neal M. Weaver  
Managing Director**

**Effective: March 19, 2015**

This Brochure Supplement provides information about the background and qualifications of Neal M. weaver (CRD# 2971832) in addition to the information contained in the LeafHouse Financial Advisors, LLC (“LeafHouse”) Brochure. If you have not received a copy of this Brochure or if you any questions about the contents of the LeafHouse Brochure or this Brochure Supplement, please contact us at (512) 879-1505.

Additional information about Neal M. Weaver is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Educational Background and Business Experience

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Neal M. Weaver is a Managing Director of LeafHouse. Neal Weaver, born in 1971, is dedicated to advising Clients of LeafHouse. Mr. Weaver earned a Bachelors in Business Administration from the University of Texas at El Paso in 1994. Mr. Weaver earned a Masters in Business Administration from the University of Texas at El Paso in 2006. Additional information regarding Mr. Wheeler's employment history is included below.

### Business Background:

Managing Director, LeafHouse Financial Advisors, LLC	2010 to Present
Managing Director, LeafHouse Financial Group, LLC	2008 to Present
Agent, Riversource Life Insurance Co.	2006 to 2008
Senior Financial Advisor, Ameriprise Financial Services, Inc.	2005 to 2008
Senior Financial Advisor, American Express Financial Advisors, Inc.	1998 to 2005

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Mr. Weaver.** Mr. Weaver has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Weaver.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and /or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kading.**

However, we do encourage you to independently view the background of Mr. Weaver on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter 2971832 in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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### Insurance Agency Affiliation

Neal M. Weaver is an insurance representative of various insurance companies. In this capacity Neal M. Weaver may receive customary commissions, and other related revenues from the sale of insurance products. Some of these revenues may come in the form of sales incentives, and most cause the employee to have a conflict of interest in recommending these various insurance companies in any capacity.

Further, Mr. Weaver's affiliation with various insurance companies may create certain conflicts of interest in recommending products of the insurance companies which Mr. Weaver represents. Clients are under no obligation to purchase any insurance products from Mr. Weaver or the various insurance companies he represents.

## Item 5 – Additional Compensation

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Except as noted above, Mr. Weaver is compensated solely by LeafHouse for the services provided to Clients. Mr. Weaver does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of LeafHouse.

## **Item 6 – Supervision**

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Mr. Weaver serves as a Managing Director of LeafHouse and is supervised by Todd Kading, the Chief Compliance Officer. Todd Kading can be reached at (512) 879-1505.

LeafHouse has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of LeafHouse. Further, LeafHouse is subject to regulatory oversight by various agencies. These agencies require registration by LeafHouse and its employees. As a registered entity, LeafHouse is subject to examinations by regulators, which may be announced or unannounced. LeafHouse is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Brandon C. Bienek**  
**Plan Analyst & Marketing Director**

**Effective: March 19, 2015**

This Brochure Supplement provides information about the background and qualifications of Brandon C. Bienek (CRD# **5913428**) in addition to the information contained in the LeafHouse Financial Advisors, LLC ("LeafHouse" or the "Advisor" CRD #149694) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or LeafHouse's Disclosure Brochure, please contact us at (512) 879-1505.

Additional information about Brandon C. Bienek is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Educational Background and Business Experience

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Brandon C. Bienek is the Plan Analyst & Marketing Director at LeafHouse Financial Advisors, LLC. Mr. Bienek, born in 1988, is dedicated to serving the Clients of LeafHouse Financial Advisors, LLC. Mr. Bienek earned a Bachelor of Science in Finance from Regis University in 2010. Additional information regarding Mr. Bienek's employment history is included below.

### Employment History:

Plan Analyst & Marketing Director, LeafHouse Financial Advisors, LLC	1/2011 to Present
Server, Shoreline Grill	08/10 to 10/10
Server, Limelight	03/09 to 05/09
Server, Bloom	09/08 to 12/08
Server, Satellite Bistro	11/06 to 08/07
Server, Maudie's Hacienda	05/05 to 11/06

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Bienek.* Mr. Bienek has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Bienek.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and / or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Bienek.*

However, we do encourage you to independently view the background of Mr. Bienek on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 5913428 in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

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Mr. Bienek is a dedicated to the investment advisory activities of LeafHouse's Clients. Mr. Bienek does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Bienek is a dedicated to the investment advisory activities of LeafHouse's Clients. Mr. Bienek does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Bienek serves as the Plan Analyst & Market Director of LeafHouse and is supervised by Todd Kading, the Chief Compliance Officer. Todd Kading can be reached at (512) 879-1505.

LeafHouse has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of LeafHouse. Further, LeafHouse is subject to regulatory oversight by various agencies. These agencies require registration by LeafHouse and its employees. As a registered entity, LeafHouse is subject to examinations by regulators, which may be announced or unannounced. LeafHouse is required to

periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**Form ADV Part 2B – Brochure Supplement**  
**for**

**Brett O. Wheeler**  
**Vice President of Institutional Service**

**Effective: March 16, 2015**

This Brochure Supplement provides information about the background and qualifications of Brett O. Wheeler (CRD# 5472903) in addition to the information contained in the LeafHouse Financial Advisors, LLC (“LeafHouse” or the “Advisor”) (CRD # 149694) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the LeafHouse Disclosure Brochure or this Brochure Supplement, please contact us at (512) 879-1505.

Additional information about Mr. Wheeler is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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[www.leafhousefinancial.com](http://www.leafhousefinancial.com)

## Item 2 – Educational Background and Business Experience

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Brett Wheeler is the Vice President of Institutional Service of LeafHouse. Brett Wheeler, born in 1984, is dedicated to advising Clients of LeafHouse. Mr. Wheeler earned a Bachelors in Business Administration from the University of Texas at San Antonio in 2007. Additional information regarding Mr. Wheeler's employment history is included below.

### Employment History:

Vice President of Institutional Service, LeafHouse Financial Advisors, LLC	06/2014 to Present
Managing Member, The Bellwether Group, LLC	03/2012 to Present
insurance agent, TEAM Retirement Solutions	10/2009 to 03/2012
Registered Representative, Planmember Securities Corporation	03/2008 to 03/2012
Insurance Agent, Elite Plus Financial	08/2008 to 10/2009

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Mr. Wheeler.** Mr. Wheeler has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Wheeler.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and /or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Wheeler.**

However, we do encourage you to independently view the background of Mr. Wheeler on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter 5472903 in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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The Bellwether Group, LLC

Mr. Wheeler is the Managing Member of The Bellwether Group, LLC.

Insurance Agency Affiliations

Mr. Wheeler, Investment Advisor of LeafHouse, may serve as an insurance professional for various insurance companies. This activity is done separate and apart from his role with LeafHouse. As an insurance professional, Mr. Wheeler may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Wheeler or the Advisor.

## Item 5 – Additional Compensation

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Mr. Wheeler has additional business activities that are detailed in "Item 4 - Other Business Activities" in Part 2B above.



## **Item 6 – Supervision**

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Mr. Wheeler serves as the Vice President of Institutional Service of LeafHouse and is supervised by Todd Kading, the Chief Compliance Officer. Todd Kading can be reached at (512) 879-1505.

LeafHouse has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of LeafHouse. Further, LeafHouse is subject to regulatory oversight by various agencies. These agencies require registration by LeafHouse and its employees. As a registered entity, LeafHouse is subject to examinations by regulators, which may be announced or unannounced. LeafHouse is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: March 19, 2015

### Our Commitment to You

LeafHouse Financial Advisors, LLC ("LeafHouse") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. LeafHouse (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

LeafHouse does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What sources do we collect information from in addition to you?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to: <ul style="list-style-type: none"> <li>• Processing transactions;</li> <li>• General account maintenance;</li> <li>• Responding to regulators or legal investigations; and</li> <li>• Credit reporting, etc.</li> </ul>	LeafHouse may share this information.	Clients cannot limit the Advisor's ability to share.
<b>Administrators</b> We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.	LeafHouse may share this information.	Clients cannot limit the Advisor's ability to share.
<b>Marketing Purposes</b> LeafHouse does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where LeafHouse or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	LeafHouse does not share personal information.	Clients cannot limit the Advisor's ability to share.
<b>Authorized Users</b> In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.	LeafHouse does share personal information.	Clients can limit the Advisor's ability to share.
<b>Information About Former Clients</b> LeafHouse does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	LeafHouse does not share personal information regarding former clients	Clients can limit the Advisor's ability to share.

#### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.

Our employees are advised about LeafHouse's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.

**Changes to our Privacy Policy.**

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

**Questions:** You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (512) 879-1505.