



Fee-Only Personal Financial Advisors



Firm Brochure **Part 2 A & B of Form ADV** **Dated March 14, 2017**

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Website: www.cambridgeconnection.com

This brochure provides information about the qualifications and business practices of
Cambridge Connection, Inc.

If you have any questions about the contents of this brochure, please contact our Head of Compliance,
Carol Johnson, at 800-224-1040 or carol@cambridgeconnection.biz.

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. Registration with the SEC as an RIA "Registered Investment Advisor" does not imply a certain level of skill or training. Additional information about Cambridge Connection, Inc. also is available on the SEC's website at adviserinfo.sec.gov



2017 Firm Brochure Part 2 A & B of Form ADV

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Cambridge Connection, Inc.

SEC # 801-26096 • IARD/CRD # 112086

Firm Brochure ADV Part 2 A & B

This Firm Brochure is required by the Securities and Exchange Commission (SEC) to be given to all potential clients by Investment Advisors prior to any contractual agreement. Please go online at adviserinfo.sec.gov or contact Carol Johnson, the Cambridge Connection, Inc. Head of Compliance in the event you would like to review hardcopies of our ADV Part I or 2.

Item 1 - Cover Page

The SEC requires Investment Advisors to clearly and concisely convey the intent of this brochure, contact information, and disclaimers.

Please feel free to contact any member of the Cambridge Connection staff who will put you in touch with our Head of Compliance in the event you have any questions or concerns.

Item 2 - Material Changes

An investment adviser is required to disclose in its brochure material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or to the integrity of its management personnel. An investment adviser must deliver promptly to client's updated information when there is new disclosure of a disciplinary event or a material change to an existing disciplinary event.

Effective January 1, 2017, a transition of the Tucson client base was made to our long-term support partner at Cambridge Financial Group. This strategy is part of Bert's five year retirement plan, and the Tucson group is still currently supported by Bert Whitehead through a consulting relationship with Cambridge Financial Group.

We have no additional changes to report at this time. In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. The date of our last annual update to our Firm Brochure is March 9, 2016.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Free of charge, our Firm Brochure may be requested by contacting Andrew Campagna at 800-224-1040 ext 101 or andrew@cambridgeconnection.biz. Our Brochure is also available on our website cambridgeconnection.com.

You will find Cambridge Connection, Inc.'s full ADV and Firm Brochure available via the SEC's web site adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Cambridge Connection, Inc. who are registered, or are required to be registered, as investment adviser representatives of Cambridge Connection, Inc.

Item 3 - Table of Contents -- See Page 2

Item 4 - Advisory Business

An investment adviser must describe its advisory business, including the types of advisory services offered, state whether it holds itself out as specializing in a particular type of advisory service, and disclose the amount of client assets that it manages.

Firm Description

Since 1972, Cambridge Connection, Inc. has provided confidential financial planning services and acted as a trusted guide for providing clients means to identify their personal financial objectives; find solutions to their financial problem areas; goal setting; design and simplify their cash flow, perform tax planning as well as individual tax preparation, advising on financial risk and investment allocations, retirement planning, insurance and estate planning. All services are tailored to the client's unique objectives. In 2014, Cambridge Connection began providing investment advice to a charitable organization*. Cambridge Connection does not sell insurance or investment products, nor does it accept commission as a result of any product recommendations. Cambridge Connection does not pay referral or finder's fees, nor does it accept such fees from other firms.

**The term 'client' will encompass both clients and charitable organizations within this Firm Brochure.*

Principal Owners

The stock of Cambridge Connection, Inc. is held by Bert Whitehead, President and principal owner.

Services Provided

Cambridge Connection, Inc. prepares tax returns, provides tax advice, and audit representation. Included in the retainer is a simple will that is prepared by a local attorney who may or may not be associated with the firm. Cambridge Connection provides investment advisory services and advice, compiles the "Cambridge Pyramid" for clients to review their investments, and also furnishes financial advice on matters not involving securities.

Financial Review - The Financial Review consists of a two or three hour review of up to three financial planning questions selected in advance by the client. No follow-up services are provided with the Financial Review.

Project Retainer - Services under the Project Retainer are typically provided on a flat-fee basis. Fees are due at the beginning of the engagement. At Cambridge Connection Inc.'s discretion, fees may be paid with one-half due at the beginning of the engagement and the remainder upon completion.

Initial Retainer Agreement: a Full Retainer Agreement provides holistic/ comprehensive financial planning for a fixed annual fee. The client agrees to an ongoing relationship with Cambridge Connection, Inc. as their trusted guide in the financial areas of their life.

The goals and objectives of each client are discussed and documented. Recommendations provided are uniquely individual to the client and their current situation. Detailed investment advice and specific recommendations are provided as part of this process. Implementation of the recommendations is always at the discretion of the client.

During the **Initial Year** there are a number of meetings covering from five to ten client-relevant topics (see following list). Meetings be held face-to-face or via secure computer link and/or telephone lines. Business development and/or education funding may also be included where appropriate. Implementation services are provided as needed.

Tax preparation	Budgeting and cash flow	Tax planning
Record-keeping	Inventory of client assets	Retirement planning
Portfolio analysis	Goal setting	Develop asset allocation strategies
Estate planning review	Investment Selection	Small business planning
Insurance analysis	Education planning	Analysis of employee benefits

In **Renewal Years** the number of meetings is typically less and appointment topics will depend on what is appropriate for the client:

Tax planning & Tax preparation	Goal setting/review
Investment review/update	Rebalancing of assets
Financial planning and/or any financial services as requested or needed by client	

Client Assets

As of March 2017, Cambridge Connection, Inc. institutional accounts at Schwab, TD Ameritrade, and TIAA-CREF held approximately \$320,447,457.

Item 5 - Fees and Compensation

An investment adviser must describe how it is compensated for its advisory services, provide a fee schedule, and disclose whether fees are negotiable. The investment adviser must also describe the types of other fees or expenses, such as brokerage fees, custody fees, and fund expenses that clients may pay in connection with the services provided.

Fee Billing

Cambridge Connection, Inc. is a fee-only financial advisory firm and is compensated solely by fees paid directly by the client. We do not accept commissions or compensation from any other source and believes there is a significant "conflict of interest" if an advisor stands to gain financially from the purchase of any product he or she recommends to the client. At Cambridge Connection, Inc., our compensation is not contingent on the outcome of any transaction where the client is relying on our counsel.

Cambridge provides financial planning services for a fixed fee. Clients who elect to pay annually in advance for tax reasons may receive a prepayment discount. Our schedule is as follows:

Cambridge Financial Review	\$750-\$950. Payable ½ at inception and ½ at review; nonrefundable.
Project Retainers	\$3,000-\$5,000. Payable at time of project negotiation.
Standard Retainers	\$2,000-\$10,000. Payable at terms elected by client: monthly, quarterly, annually or in advance annually if requested by client.
Wealth Management Retainers	\$10,000-\$40,000. Fee calculated for investment portfolios over \$1,000,000 based on net marketable assets, income, complexity, time required, responsibility assumed, and value added. Payable at terms elected by client: quarterly, annually or in advance annually if requested by client.

Fee Negotiation, Nonpayment and Termination

Fees are not negotiable and refunds are available when requested in writing for unused portion. Cambridge Connection, Inc. reserves the right to stop work on any account that is unpaid.

Either the client or Cambridge Connection may terminate an engagement at any time, without penalty, upon written notice. In addition, Cambridge Connection reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Cambridge Connection's judgment, to providing proper financial and tax advice. Cambridge Connection may also terminate a retainer and refund unused portion of the fee on a pro-rata basis where a client has been abusive to staff, in the sole discretion of Cambridge Connection, Inc.

Other Fees

Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus or in advance by Cambridge Connection, Inc. Such charges, fees and commissions are exclusive of and in addition to Cambridge Connection's fee, and Cambridge Connection does not receive any portion of these commissions, fees, and costs.

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

An investment adviser that accepts performance-based fees, or that supervises an individual who accepts such fees, is required to disclose this fact. If the investment adviser also manages accounts that are not charged a performance fee, the adviser must explain the conflicts of interest that arise from the simultaneous management of these accounts and must describe how it addresses those conflicts.

Cambridge Connection, Inc. does not accept performance based fees (i.e. fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 - Types of Clients

An investment adviser is required to disclose the types of clients to whom it generally provides investment advice (e.g., individuals, trusts, investment companies, pension plans).

Cambridge Connection, Inc. serves individuals and charitable organizations and does not impose minimums in accounts as a provision of providing financial planning services.

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

An investment adviser must describe its methods of analysis and investment strategies and explain that investing in securities involves risk of loss which clients should be prepared to bear. Investment advisers who use a particular method of analysis or strategy or who recommend a particular type of security are required to explain the material risks involved and discuss the risks in detail if those risks are unusual.

Methods of Analysis

In determining investment recommendations, Cambridge Connection will utilize public information obtained from financial newspapers and magazines, research materials prepared by others, annual reports, prospectuses, filings with the SEC, U.S. Tax Code, IRS Regulations, Tax Court decisions, and the Suggested List of Funds from the Alliance of Comprehensive Planners (ACP). Moreover, Cambridge Connection approaches investment portfolio analysis and implementation based on internal factors such as your tax situation, overall risk tolerance, current financial situation, and your personal goals and aspirations. After identifying these items, your portfolio will be structured around your individual needs, while attempting to minimize negative effects of external factors, such as interest rates, market performance, and the economy as a whole.

Investment Strategies

In general, Cambridge Connection utilizes Functional Asset Allocation™ (FAA). The foundation of FAA views the success or failure of an individual's investment portfolio depends much more on what is going on in an investor's life (the endogenous factors) than on the state of the economy and other world events (exogenous factors). The driving force behind FAA is your unique situation and the endogenous factors that define you. Each of the three broad asset classes we use: Interest Earning, Real Estate and Equities and each has a specific function. Functional Asset Allocation not only provides most of the benefits of diversification of Modern Portfolio Theory, but also yields a better after-tax return with less risk for real people.

Cambridge offers advice on no-load mutual funds (i.e. funds that have no upfront or backend sales fees), U.S. Government bonds, money market accounts, certificates of deposit, equities, municipal securities, investment company securities, United States government securities, partnership interests, real estate, gold coins, or alternative investments of interest to clients.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. The inherent risks associated with any investment recommended by Cambridge Connection will be thoroughly reviewed and discussed with the client's goals, needs, and objectives at the forefront. This will help ensure the client fully understands his/her investments and that he/she is properly prepared to bear any associated risks. Our investment approach constantly keeps the risk of loss in mind.

Item 9 - Disciplinary Information

An investment adviser is required to disclose in its brochure material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or to the integrity of its management personnel. An investment adviser must deliver promptly to clients' updated information when there is new disclosure of a disciplinary event or a material change to an existing disciplinary event.

Cambridge Connection, Inc. has no complaints filed with the SEC and is under no disciplinary actions.

Item 10 - Other Financial Industry Activities and Affiliations

An investment adviser is required to disclose information about financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between the adviser and clients.

Cambridge Connection, Inc. is a member of the Alliance of Comprehensive Planners (ACP). This non-profit, member-owned organization provides training and support through an alliance of fee-only comprehensive financial advisors. As a member of ACP, Cambridge Connection has the right to use proprietary products and systems designed by ACP. ACP provides ongoing training in the form of conferences and services produced by collaborative efforts of the fee-only financial advisors.

Cambridge Connection, Inc. is also a member of the National Association of Personal Financial Advisors (NAPFA), which requires that their members are fee-only, and obtain a minimum of 60 continuing education credits every two years. We are also members of the FPA (Financial Planning Association) and NATP (National Association of Tax Practitioners).

As a convenience to its clients, Cambridge Connection, Inc. has relationships with Charles Schwab Institutional Services, TD Ameritrade, TIAA-CREF, and Asset Dedication, LLC. Clients may use any brokerage house they prefer. Cambridge Connection may suggest that clients consider brokerage accounts at listed custodians so that Cambridge Connection advisors may better supervise client accounts through the use of online viewing access, electronic trade confirmations, power of attorney and limited power of attorney.

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

An investment adviser is required to describe briefly its code of ethics and state that a copy is available upon request. The adviser must also disclose whether it or an affiliate recommends to clients, or buys or sells for client accounts, securities in which the adviser or an affiliate has a material financial interest and, if so, the conflicts of interest associated with that practice. The adviser also must disclose whether it or an affiliate invests (or is allowed to invest) in the same securities that it recommends to clients or in related securities, such as options or other derivatives, and must explain the conflicts involved and how it addresses those conflicts. In addition, an investment adviser that trades in the recommended securities at or around the same time as the client has to explain the specific conflicts inherent in that practice and how it addresses them.

The staff of Cambridge Connection, Inc. has committed to a Code of Ethics that, in summary, outlines our ethical standard to always act in the best interest of our clients. It is part of this Cambridge Connection, Inc. Firm Brochure and is issued to all clients on an annual basis, to prospective clients, and is available upon request.

In concise terms Cambridge Connection Inc. shall always:

- ▲ Act as a fiduciary, act in the best interest of each and every client
- ▲ Act with integrity and dignity when dealing with clients, prospects, & others
- ▲ Strive to maintain and continually enhance our high degree of professional education regarding all aspects of personal financial planning; and
- ▲ Seek at all times to preserve our firm's independence and to maintain our complete objectivity with respect to our planning services and each recommendation made to our clients.
- ▲ We abide by a very high ethical fiduciary standard which prohibits our compensation being predicated on the outcome of any transaction regarding which a client is relying on our counsel.

Participation or Interest in Client Transactions

Cambridge Connection Inc. staff may buy or sell securities for their own accounts that are also held by clients. All transactions affecting staff member's accounts are reviewed quarterly to prevent 'front running' schemes, etc. Staff members are advised to invest in open-ended mutual funds and shares of stocks traded on recognized exchanges and to disclose when securities bought for their own accounts are traded in closed funds, over-the-counter, or other ways which may create conflicts with clients' investments. Where such investments are made, any clients affected would be notified directly within a reasonable time. Staff at Cambridge Connection, Inc. complies with the provisions of the Cambridge Connection, Inc. Compliance Manual. These restrictions do not apply to individual real estate transactions which are not classified as securities.

Cambridge Connection, Inc., as a general policy, does not elect to participate in class action lawsuits on behalf of its clients. Rather, such decisions shall remain with the client or an entity designated by the client. Cambridge Connection, Inc. may assist the client in determining whether the client should pursue a particular class action lawsuit by assisting with the development of an applicable cost-benefit analysis, for example. However, the final determination of whether to participate and the completion and tracking of any such related documentation shall generally rest with the client.

Personal Trading

The Chief Compliance Officer of Cambridge Connection, Inc. is Carol Johnson and the Oversight Committee is comprised of Bert Whitehead (President) and Carol Johnson. All staff trades are documented and submitted for review quarterly, as well as an overall holdings report is submitted annually. The Oversight Committee reviews all staff trades regularly. The personal trading reviews ensure that personnel's trading does not affect the markets, and that clients of the firm receive preferential treatment. Since most staff trades are small mutual fund trades, the trades do not affect the securities markets.

Cambridge Connection Inc. further prohibits the use of material non-public information and protects the confidentiality of the client information. We require that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to disciplinary action.

Item 12 - Brokerage Practices

An investment adviser is required to describe the factors considered in selecting or recommending broker-dealers for client transactions and determining the reasonableness of brokers' compensation. Investment advisers also must disclose soft dollar practices (research or other products or services, other than execution, provided by brokers or a third party to the investment adviser in connection with client transactions); client referrals (using client brokerage to compensate brokers for client referrals); directed brokerage (asking or permitting clients to send trades to a specific broker for execution); and trade aggregation (bundling trades to obtain volume discounts on execution costs). Investment advisers must explain how they address the various conflicts of interest associated with these practices.

Selecting Brokerage Firms

Cambridge Connection, Inc. does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. Cambridge Connection recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates, but never requires its clients utilize any given custodian/broker-dealer.

Cambridge Connection, Inc. recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab or TD Ameritrade. Cambridge Connection, Inc. has a custodial relationship with Schwab Institutional Services, TD Ameritrade, and TIAA-CREF.

Cambridge Connection, Inc. *DOES NOT* receive fees or commissions from any of these arrangements.

Best Execution

In recommending a broker dealer for specific trades, Cambridge Connection, Inc. will generally seek “best execution”. Factors considered include, but are not limited to, the broker-dealers facilities, costs, reliability and financial responsibility, the ability of the broker-dealer to effect transactions, and the research and related brokerage services provided to you and/or Cambridge Connection.

Order Aggregation

Whenever possible, Cambridge Connection, Inc. will aggregate trades so as to minimize trade costs to clients. Since there are no assets under management, this occurs **very infrequently** and most trades are placed on an individual basis with minimal, if any, trading fees.

Item 13 - Review of Accounts

An investment adviser is required to indicate whether they periodically review client accounts or financial plans. If they do, they must describe the frequency and nature of the review, and the title(s) of the supervised persons who conduct the review. If the review of client accounts is on other than a periodic basis, they must describe the factors that trigger a review. In addition, they must describe the content and indicate the frequency of regular reports they provide to clients regarding their accounts. State whether these reports are written.

Periodic Reviews and Triggers

Cambridge Connection, Inc. provides annual, semi-annual, quarterly, or monthly analysis of net worth to access diversification and review investments based on retainer agreement and needs of the client.

Regular Reports

Cambridge Connection, Inc. makes written recommendations at the conclusion of an appointment summarizing the topic(s) discussed, recommendations presented and outcome of those recommendations where appropriate.

If you, as a client, have any brokerage accounts, including those at Charles Schwab Institutional, TD Ameritrade, or TIAA-CREF, you will receive monthly or quarterly statements from your custodians. The statements will be in either in paper or electronic form pertaining to your account(s) which includes all transaction made in your account and your current balances.

Item 14 - Client Referrals and Other Compensation

An investment adviser must disclose if someone else provides economic benefit to them for providing client advisory services.

Cambridge Connection does not receive any economic benefit (including commissions, equipment, or non-research services) from non-clients in connection with our advice to client, nor do we compensate any person for client referrals. We do not sell insurance, receive commissions, nor accept referral fees.

Item 15 - Custody

An investment advisor shall explain how account statements are delivered from qualified custodians of clients funds and encourage clients to carefully review these statements. If an investment advisor provides their own generated reports, those reports should also be carefully compared by clients.

Although Cambridge Connection, Inc. does not take custody of client funds (with the exception of prepaid fees, if applicable), clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Cambridge Connection urges clients to carefully review such statements and compare such official custodial records to the documentation we may provide. Our information may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Custody and Access to Client Accounts

The SEC has ruled when an advisor has access via client logins and passwords, they are deemed to have custody (except in the case where read-only access can be arranged). Where Cambridge Connection, Inc. has Institutional accounts (Schwab, TD Ameritrade, TIAA-CREF) we will continue to draft LPOA's and/or acquire client consent for all client transactions. Under no circumstance shall any Cambridge Connection staff member maintain/possess client logins, passwords, PINS, or other methods of access to client accounts at any institution, bank, or other custodian of client funds. This includes, but not limited to, client pensions, 401k, and Schwab charitable. Cambridge Staff may assist a client with advice and transactions upon client request and the client accesses the account, but staff cannot possess and access the account themselves.

Custody and Handling of Client Funds

The SEC has ruled if an advisor received client securities, and the advisor does not return the securities to the sender within three business days, the advisor not only has custody but has also violated the amended rule's requirement that client securities be maintained in an account with a qualified custodian. Cambridge Connection, Inc. shall not handle any client check or security certificate received by the firm. All such instruments must be returned to the *sender* within three business days. Inadvertent client funds received such as tax refunds or client settlement proceeds must be forwarded to the *client* within five business days. In all instances proper records shall be maintained.

Item 16 - Investment Discretion

If an investment advisor accepts discretionary authority to manage securities accounts on behalf of clients, they must disclose this fact and describe any limitations clients may (or custodians do) place on this authority. Describe the procedures you follow before you assume this authority (e.g., execution of a power of attorney).

Discretionary Authority for Trading

At the client's request, Cambridge Connection, Inc. may execute the sale and/or purchase of investments by obtaining specific client consent, to buy/sell securities, the amount to buy/sell, which broker/dealer to use or affect commission rates, although we may suggest a broker to a client.

A limited power of attorney or power of attorney is a trading authorization. Clients often sign a LPOA or a POA so that we may execute the trades that the client has approved.

Item 17 - Voting Client Securities

If an investment advisor has or will accept the authority to vote client securities, they must describe their voting policies and procedures, including but not limited to, addressing conflicts of interest, if and how a client can direct their vote, and how to obtain the results of the voting.

Proxy Voting

Cambridge Connection maintains a policy of not voting proxy. The SEC has recommended Cambridge Connection disclose our policy, in writing, to avoid an implied voting authority by the overall delegation of discretionary authority (discretionary authority gives Cambridge Connection the ability to place trades for clients).

Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Cambridge Connection, Inc. does not provide advice to clients regarding the clients' voting of proxies.

Item 18 - Financial Information

An investment adviser is required to make known certain financial information or disclosures about the firm's financial condition.

Cambridge Connection, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Cambridge Connection, Inc. does not take custody of client's accounts or funds with the exception of pre-paid fees. The SEC requires Advisers to provide an audited balance sheet to substantiate the financial health of the firm. A client may, upon request to the Michigan office, obtain a copy of our Independent Auditor's Report and Balance sheet.

Item 19 - Requirements for State Registered Advisers

This item is not applicable as Cambridge Connection, Inc. is a Registered Investment Advisor with the Federal Securities and Exchange Commission. Registration notices are issued by the SEC to individual States.

Supplements. The Cambridge Connection, Inc. Firm Brochure contains the required "brochure supplements". We are required to deliver our Firm Brochure to new and prospective clients providing them with information about the specific individuals who will provide services to the clients. The supplement will contain brief résumé-like disclosure about the educational background, business experience, other business activities, and disciplinary history of the individual, so that the client can assess the person's background and qualifications. It will also include contact information for the person's supervisor in case the client has a concern about the person.

Internet Availability. Advisers are required to electronically file brochures, which will be publicly available on the SEC's website.

Items Reviewed & Validated Mar 14, 2017



U.S. Securities and Exchange Commission

An investment advisor is a fiduciary who has a duty of undivided loyalty to its clients and must deal fairly and honestly with them. Any person or entity that holds itself out as a financial planner must be registered. A Registered Investment Advisor is a representative of the client.

Form ADV

Form ADV is the uniform form used by investment advisers to register with both the Securities and Exchange Commission (SEC) and state securities authorities. The form consists of two parts. Part 1 requires information about the investment adviser's business, ownership, clients, employees, business practices, affiliations, and any disciplinary events of the adviser or its employees. Part 1 is organized in a check-the-box, fill-in-the-blank format. The SEC reviews the information from this part of the form to process registrations and manage its regulatory and examination programs. Although designed for a regulatory purpose, investment adviser filings of Part 1 are available to the public on the SEC's Investment Adviser Public Disclosure (IAPD) website at adviserinfo.sec.gov.

Beginning in 2011, Part 2 requires investment advisers to prepare narrative brochures written in plain English that contain information such as the types of advisory services offered, the adviser's fee schedule, disciplinary information, conflicts of interest, and the educational and business background of management and key advisory personnel of the adviser. The brochure is the primary disclosure document that investment advisers provide to their clients. When filed, the brochures are available to the public on the [IAPD](http://www.iapd.com) website.

Investment advisers are required to deliver annually to clients a summary of material changes to the brochure and either deliver a complete updated brochure or offer to provide the client with the updated brochure. In addition, an investment adviser must deliver to clients a brochure supplement that provides information about the specific employees, acting on behalf of the investment adviser, who actually provide the investment advice to the client. The brochure supplement also includes contact information for the person's supervisor in case the client has a concern about the person. The brochure supplement must be delivered either before or at the time that the employee begins to provide investment advice to a client. An updated supplement must be delivered to clients when there is new disclosure of a disciplinary event, or a material change to disciplinary information that has already been disclosed.

Before you hire someone to be your investment adviser, always ask for, and read carefully, both parts of the adviser's Form ADV. You can find a copy of an investment adviser's most recent Form ADV on the [IAPD](http://www.iapd.com) website. Most state-registered advisers file Form ADV electronically and their Form ADV (Part 1) filings also are available on IAPD.

For more information about registering as an investment adviser with the SEC and related information, please visit the [SEC's Investment Adviser Registration Depository](http://www.sec.gov/investor/pubs/adv.htm) web page. To learn about state-registered investment advisers, please visit the [North American Securities Administrators Association's](http://www.nasaa.org) website, which provides contact information for all state securities regulators.

For information about selecting an investment adviser, please read our publication, [Investment Advisers: What You Need to Know Before Choosing One](#).

Additional information on Form ADV may be viewed at <http://www.sec.gov/divisions/investment/iard/iastuff.shtml>.

We have provided this information as a service to investors. It is neither a legal interpretation nor a statement of SEC policy. If you have questions concerning the meaning or application of a particular law or rule, please consult with an attorney who specializes in securities law.

Code of Ethics and Personal Trading Policy

Summary Description

Standards of Conduct

The SEC requires Advisers to provide a summary description of their Code of Ethics and Personal Trading Policy. A client may, upon request to the Michigan Office, obtain a full copy of our Code of Ethics and Personal Trading Policy.

The Advisers Act imposes a fiduciary duty on investment advisers. As a fiduciary, Cambridge Connection, Inc. has a duty of utmost good faith to act solely in the best interests of each of our clients. Our clients entrust us to monitor their funds, which in turn places a high standard on our conduct and integrity. Our fiduciary duty compels all staff members to act with the utmost integrity in all of our dealings. This fiduciary duty is the core principle underlying these Code of Ethics and Personal Trading Policy, and represents the expected basis of all of our dealings with our clients.

It is also understood that our fee is not based on the outcome of any transaction where a client relies on Cambridge Connection, Inc. for advice. Any conflict that may arise from our position must be fully disclosed in writing.

This Code of Ethics consists of the following core principles:

The interests of clients will be placed ahead of the firm's or any staff member's own investment interests. Staff members are expected to conduct their personal securities transactions in accordance with the Personal Trading Policy and will strive to avoid any actual or perceived conflict of interest with the client. Staff members with questions regarding the appearance of a conflict with a client should consult with the CCO (Chief Compliance Officer) before taking action that may result in an actual conflict. Staff members will not take inappropriate advantage of their position with the firm. Staff members are expected to act in the best interest of each of our clients. Staff members are expected to comply with federal securities laws. Cambridge Connection, Inc. staff members are also responsible to follow our Canon of Ethics.

Personal Conduct

As noted above, all staff are expected to conduct themselves with the utmost integrity and to avoid any actual or perceived conflict with our clients. In this spirit, the adherence to our Gift Policy, Service as Director of an Outside Company, and Outside Business Interests is required.

Personal Trading Policy

Matters to consider before a staff member places a trade: whether the amount or nature of the transaction will affect the price or market for the security; whether the staff member will benefit from purchases or sales being made for any client; whether the transaction is likely to harm any client; and whether there is an appearance or suggestion of impropriety.

Personal Trading Restrictions – General

Personal accounts of the staff member include all accounts for family members living within the staff member's household and accounts over which the staff member has authority even though the account owner does not live within the same household as the staff member. Any staff member contemplating a trade to the contrary must consult with the CCO before conducting his or her personal trade. It is the staff member's responsibility to know which securities are being traded by

the firm. The staff member may consult with the CCO or a senior advisor (and reported to the CCO) to determine whether a security is an appropriate purchase by the staff member.

Each staff member must submit to the CCO a quarterly report of personal securities transactions in which the staff member had a direct or indirect beneficial ownership interest. The CCO will generally consider the following factors when reviewing reportable security holdings and transactions or approvals by staff members to purchase IPOs or private placements; whether the investment opportunity should be directed to a client's account; whether the amount or nature of the transaction affected the price or market for the security; whether the staff member benefited from purchases or sales being made for clients; whether the transaction harmed any client; and whether the transaction has the appearance of impropriety.

Code of Ethics and Personal Trading Policy Violations

All staff members are required to report promptly any violation of this policy to the CCO (including the discovery of any violation committed by another staff member). Examples of items that should be reported include, but are not limited to, noncompliance with federal securities laws, conduct that is harmful to clients and purchasing securities contrary to the Personal Trading Policy. Such violations will be reported to the CCO and President on a timely basis.

All staff members are required to acknowledge the Code of Ethics & Personal Trading Policy upon hire and annually in connection with the firm's annual policy manual acknowledgement process.

Reviewed & Validated Mar 14, 2017

CAMBRIDGE CONNECTION, INC.
Canon of Ethics



Our advisors agree to uphold this Canon of Ethics in dealing with clients and with Cambridge Connection

Cambridge Connection and the advisor agree:

- that our single primary purpose is to provide education to our clients.
- to conscientiously schedule and complete all work contracted for within designated time period, and to return client phone calls within one business day.
- complete required continuing education to improve our professional competence.
- to act objectively in all matters with clients, and not take commissions or kickbacks based on advice or recommendations given to clients from any other source other than client fees. To not accept personal business gifts. Staff gifts may be perishable & consumable up to \$100. Meals & entertainment may only be accepted when appropriate for substantive business conversation and no travel is to be accepted at any time.
- not to indulge or participate in any matter or any activity involving fraud, backdating of instruments, etc.
- never to endorse, finance or lend the Cambridge Connection name to any related facility or outside enterprise. Cambridge Connection has no opinion on outside issues hence the Cambridge Connection name ought never be drawn into public controversy.
- not to advertise on press, radio, films, or other media except for directories listing professional advisors for convenience of the general public, since our public relations is based on attraction rather than promotion.
- to pay any moneys agreed to in a prompt and timely manner without requiring follow-up by clients, Cambridge Connection or the United States government.
- that the advisor will not prepare any income tax returns, nor render any other services offered by Cambridge Connection to other than Cambridge clients, except in specified cases.
- to make full disclosures to each other and to Cambridge Connection with any incident or matter involving this Canon of Ethics.
- that our common welfare should come first. Our advisors will not compete with each other nor will Cambridge Connection favor one advisor over the other, and when called upon, each advisor will do his or her utmost to provide services which clients have contracted for.
- that in all matters concerning Cambridge Connection, the decision of the Board of Directors is final.
- that the advisor will not engage in any business activities in competition with Cambridge Connection.
- to file personal tax returns and maintain licenses as required with verification made to Cambridge Connection annually.
- that our compensation is designed so it is not contingent on any transaction on which our clients rely on our advice and full disclosure is made to the client whenever there is a possible conflict in this regard.

Reviewed & Validated Mar 14, 2017

Privacy Statement



Cambridge Connection, Inc. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. Cambridge Connection, Inc. and its staff members understand the need for careful handling of this information.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your written permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your written permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

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

We do not provide your personal information to mailing list vendors or solicitors.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law. Various service providers providing administrative functions for Cambridge Connection, Inc. (such as our technology service provider), have entered into a contractual agreement that prohibits the service provider from disclosing or using confidential information except as necessary to carry out its assigned responsibilities and only for that purpose; or as permitted by law.

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

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Statement* to you annually, electronically or in writing.

We also comply with local law where that law imposes additional restrictions on the confidentiality and security of client information.

Reviewed & Validated Mar 14, 2017



Cambridge Connection, Inc.

Succession Plan



If something were to happen to Bert Whitehead, Pamela Landy, Christopher Zehnder, or Melissa Scenga, in which they could not continue their service to clients, Cambridge Connection would work with clients to transfer them to another qualified advisor. All Cambridge Connection clients are serviced by an associate and the associate would work with the client to segue to an advisor of their choosing. Arrangements with the following qualified advisors have committed to being available if requested.

The client has the option to continue with any advisor they choose, not limited to those listed below, and the associate will aid in the transferring process.

- 1) Cambridge Connection, Inc. Advisors:
 - a. Pamela Landy, JD, MBA, CFP®
 - b. Melissa Scenga, MAcc, EA, CFP®
 - c. Christopher Zehnder, MBA, EA, CFP®
 - d. Bert Whitehead, JD, MBA
- 2) David Lentz, JD, CFP®, Jason Moore, CFP®, Kelly Adams, CFP®, or Douglas W. DeGain, CFP®
- 3) Geographically desirable Advisors within the Alliance of Comprehensive Planners

If any Cambridge Connection, Inc. office were to be destroyed, Cambridge Connection, Inc. would operate out leased space until a new facility could be established. All of our client information is backed daily to a secured off-premise cloud based site, rendering it unaffected by a disaster to the office. The backup is audited randomly by the compliance staff to assure operational continuity and effectiveness.

Reviewed & Validated Mar 14, 2017



Cambridge Connection, Inc.
Firm Brochure
Supplement Section
Supervised Persons

This supplemental section is incorporated into the Cambridge Connection, Inc. Firm Brochure and provides information on the advisors and staff. Very large firms with hundreds of staff members have separate “Supervised Persons” Supplemental Brochures. The SEC wants to make clients aware they should have received both the Firm Brochure and the Supplements. Since Cambridge Connection takes the comprehensive approach, we have combined all SEC brochure requirements into one complete Firm Brochure. Please contact your Advisor or Carol Johnson, Head of Compliance for Cambridge Connection, Inc. if you have any questions about the contents of this supplement.

Although Cambridge Connection Inc. has not been named in any disciplinary events, we want to take this opportunity to explain the disclosure directive from the SEC. Due to heightened security measures after recent investment-related scandals, the SEC directs investment adviser representatives to disclose any disciplinary actions. The SEC describes these disciplinary actions as investment related felonies, misdemeanors, criminal proceedings, in violation of an investment related statute or regulation, or has any judgments engaging in an investment related activity; or any administrative proceedings before the SEC; or caused an investment related business to lose its authorization to do business or in violation of a self-regulatory organization rules; or any other proceeding in which a professional attainment, designation or license was revoked or suspended because of a violation of rules relating to professional conduct.

Additional information about our advisors is available on the SEC’s website at www.adviserinfo.sec.gov.



Bert Whitehead, JD, MBA

Data as of March 14, 2017

Bert Whitehead, JD, MBA

President & Senior Lead Advisor

Cambridge Connection, Inc.

40950 Woodward Ave, Ste 140

Bloomfield Hills, MI 48304

Bert@cambridgeconnection.biz

Bert@BertWhitehead.com

cambridgeconnection.com

Office 248-737-7090 x101 Fax 248-737-8010

or 800-224-1040

Item 2 Educational Background and Business Experience

Born 1944

University of Arizona, Tucson, AZ - BA, Psychology - 1965

University of Arizona, Tucson, AZ - MBA Business - 1967

Detroit College of Law, Detroit, MI - JD - 1972

Cambridge Connection, Inc. (f/k/a Cambridge Associates, Inc.), Franklin, MI – President and Senior Financial Advisor- 1972 to present

Bert is the founder and CEO of Cambridge Connection, Inc. and founder of the ACP (Alliance of Comprehensive Planners). He is admitted to practice in the United States Tax Court, Federal District Court, and Michigan Courts. Bert is a member of the National Association of Personal Financial Advisors, The Financial Planning Association, and the National Association of Tax Practitioners, as well as a member of the State Bar of Michigan. Recognized as leading authority on financial planning, Bert is a regular speaker at industry conferences and is often quoted in the Wall Street Journal, Investment News, and many others. His publications include "Why Smart People Do Stupid Things with Money: Overcoming Financial Dysfunction", a variety of booklets & accompanying CD on financial issues and Deduct It! Deduct It! Charitable Donation Tracker. He also writes a periodic blog on topics of interest to clients.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Author and professional speaker comprising less than 10% of Bert Whitehead's time and compensation.

Item 5 Additional Compensation

Bert Whitehead does not receive any economic benefit (including commissions, equipment, or non-research services) from non-clients in connection with advice to clients, nor compensates any person for client referrals.

Item 6 Supervision

Clients are supported by a team where all processes are subject to review for accuracy and consistency. Client concerns or complaints may be directed to the Head of Compliance, Carol Johnson, at 800-224-1040 or carol@cambridgeconnection.biz.

Description of Designations

*Bert Whitehead, JD, MBA – A **JD** degree is the professional graduate degree, JD is the abbreviation for "Juris Doctor" or "Doctorate of Jurisprudence." An **MBA** is a post graduate degree in business. MBA stands for Masters of Business Administration. "*



Pamela Landy, JD, MBA, CFP®

Data as of March 14, 2017

Pamela Landy, JD, MBA, CFP®

Vice President & Senior Lead Advisor

40950 Woodward Ave, Ste 140

Bloomfield Hills, MI 48304

Franklin, MI 48025

Pamela@cambridgeconnection.biz

cambridgeconnection.com

Office 248-737-7090 x108 Fax 248-737-8010

or 800-224-1040

Item 2 Educational Background and Business Experience

Born 1955

Vassar College, Poughkeepsie, NY – AB in Psychology 1977

Emory University School of Law, Atlanta, GA – JD 1981

Emory University School of Business, Atlanta, GA – MBA 1981

CERTIFIED FINANCIAL PLANNER™ professional 2001

Paul J. Wagner Jr., Esq., Atlanta, GA – Attorney/Tax Advisor 1980-1981

Ernst & Whinney, Cleveland, OH – Attorney/Tax Consultant 1982-1983

International Mgmt Group, Cleveland, OH – Attorney/Financial Planner for Professional Athletes 1984-1991

McDonald, Hopkins, Burke & Haber, Cleveland, OH – Attorney Estate Planning & Probate Dept 1991-1994

Pamela S. Landy, Esquire, Cleveland, OH – Attorney Estate Planning, Elder Law, 1995 – present

Mercer Global Advisors, Santa Barbara, CA - Director of Financial Planning 2000-2001

Cambridge Connection, Inc. Franklin, MI – Senior Financial Advisor, 2002 – present

Pamela is a Senior Advisor with Cambridge Connection who has practiced law and financial planning for over 30 years. She earned her J.D.-M.B.A. from Emory University after graduating with a degree in psychology from Vassar College. Her varied experience has included tax and financial planning for athletes and entrepreneurs. Pam is a member of the ACP (Alliance of Comprehensive Planners), NATP (National Association of Tax Practitioners) and NAPFA (National Association of Personal Financial Advisors).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Non-investment related lawyer comprising less than 10% of Pamela Landy's time and compensation.

Item 5 Additional Compensation

Pamela Landy does not receive any economic benefit (including commissions, equipment, or non-research services) from non-clients in connection with advice to clients, nor compensates any person for client referrals.

Item 6 Supervision

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Description of Designations

*Pamela Landy, JD, MBA, CFP® - A **JD** degree is the professional graduate degree, JD is the abbreviation for "Juris Doctor" or "Doctorate of Jurisprudence." An **MBA** is a post graduate degree in business. MBA stands for Masters of Business Administration.*

***CFP®** is the Certified Financial Planner (CFP®) designation and is a professional certification mark for financial planners conferred by the Certified Financial Planner Board of Standards, Inc. (CFP Board). To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements.*



Christopher Zehnder, MBA, EA, CFP®

Data as of March 14, 2017

Christopher Zehnder, MBA, CFP®, EA

Senior Advisor

Cambridge Connection, Inc.

113 E. 13th Street

St. Cloud, FL 34769

Chris@cambridgeconnection.biz

cambridgeconnection.com

Office 407-957-0074 Fax 407-650-3277

or 800-224-1040

Item 2 Educational Background and Business Experience

Born 1963

Florida Institute of Technology

University of Central Florida, MBA

CERTIFIED FINANCIAL PLANNER™ professional

Enrolled Agent - IRS

Zehnder Wealth Management St. Cloud, FL – Owner & Financial Advisor - 2000 – present

Cambridge Connection, Inc. St. Cloud, FL – Senior Financial Advisor, 2002 – present

Chris teams with Bert on our Florida & San Francisco/California client bases. He holds an MBA, is a credentialed CFP®, and an EA (Enrolled Agent with the IRS). Chris is a member of the ACP (Alliance of Comprehensive Planners) and NATP (National Association of Tax Practitioners), NAPFA (National Association of Personal Financial Advisors).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Christopher Zehnder is a Registered Investment Advisor in the State of Florida and owner/operator of Zehnder Wealth Management, LLC, an investment-advisory business utilizing the Cambridge System™. Clients of Zehnder Wealth Management, LLC are serviced independently from Cambridge Connection, Inc. To avoid any conflict of interest, prospective clients of Cambridge Connection, Inc. are identified by their referral source (current client referral, referred from reading Cambridge Connection/Bert Whitehead publication, or contact through Cambridge Connection, Inc. website)

Item 5 Additional Compensation

Christopher Zehnder/Zehnder Wealth Management does not receive any economic benefit (including commissions, equipment, or non-research services) from non-clients in connection with advice to Cambridge Connection, Inc. clients, nor compensates any person for client referrals.

Item 6 Supervision

Clients are supported by a team where all processes are subject to review for accuracy and consistency. Client concerns or complaints may be directed to the Head of Compliance, Carol Johnson, at 800-224-1040 or carol@cambridgeconnection.biz.

Description of Designations

Christopher Zehnder, M.B.A., EA, CFP® - An **MBA** is a post graduate degree in business. MBA stands for Masters of Business Administration. An Enrolled Agent (**EA**) is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels of the Internal Revenue Service for audits, collections, and appeals. **CFP®** is the Certified Financial Planner (CFP®) designation and is a professional certification mark for financial planners conferred by the Certified Financial Planner Board of Standards, Inc. (CFP Board). To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements.



Melissa Scenga, MAcc, EA, CFP®

Data as of March 14, 2017

Melissa Scenga, MAcc, EA, CFP®

Senior Advisor

Cambridge Connection, Inc.

40950 Woodward Ave, Ste 140

Bloomfield Hills, MI 48304

melissa@cambridgeconnection.biz

cambridgeconnection.com

Office 248-737-7090 x102 Fax 248-737-8010

or 800-224-1040

Item 2 Educational Background and Business Experience

Born 1980

CERTIFIED FINANCIAL PLANNER™ professional

Enrolled Agent – IRS

Oakland University, Rochester, MI – Bachelors of Science in Finance - 2003

Oakland University, Rochester, MI – Master of Accounting - 2008

Cambridge Connection, Inc., Bloomfield Hills, MI – Senior Advisor, 2009 - present

Master Tax Service of Michigan, Dearborn, MI – Accountant, 2007-2009

Burke's Accounting & Tax Services, Sterling Heights, MI – Accountant, 2003 -2007

Melissa is a Senior Advisor with Cambridge Connection, Inc. She earned her Master of Accounting Degree and Bachelor of Science Degree in Finance from Oakland University. Melissa is a licensed Enrolled Agent with the Internal Revenue Service and a registered CFP®. Melissa is a member of NATP (National Association of Tax Practitioners), NAPFA (National Association of Personal Financial Advisors) and a member of the ACP (Alliance of Comprehensive Planners).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

Melissa Scenga does not receive any economic benefit (including commissions, equipment, or non-research services) from non-clients in connection with advice to Cambridge Connection, Inc. clients, nor compensates any person for client referrals.

Item 6 Supervision

Clients are supported by a team where all processes are subject to review for accuracy and consistency. Client concerns or complaints may be directed to the Head of Compliance, Carol Johnson, at 800-224-1040 or carol@cambridgeconnection.biz.

Description of Designations

Melissa R. Scenga, MAcc, EA, CFP® - **CFP®** is the Certified Financial Planner (CFP®) designation and is a professional certification mark for financial planners conferred by the Certified Financial Planner Board of Standards, Inc. (CFP Board). To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements. An Enrolled Agent (EA) is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels of the Internal Revenue Service for audits, collections, and appeals. MAcc is a graduate professional degree for use in public accounting.

Cambridge Connection, Inc. Advisor Support Staff



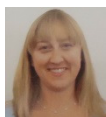
Samuel Chow is an Advisor Associate in Michigan. He grew up in Hong Kong, lived in Toronto and studied Computer Science at the University of Windsor. He is currently pursuing his EA (Enrolled Agent) license.

Samuel@cambridgeconnection.biz



Karin Jergovich is an Advisor Associate in Michigan. She earned her Bachelor of Science Degree in Finance from Oakland University in 1998. Her educational background also includes completion of the Cambridge Advisors (Alliance of Comprehensive Planners) training in 2002 and the Certified Financial Planning course in 2006 from Oakland University.

Karin@cambridgeconnection.biz



Jennifer Kulek is a Service Advisor in Michigan. She earned her Bachelor of Arts Degree in Finance from Michigan State University and her Master of Business Administration Degree from Wayne State University. She is a licensed Enrolled Agent with the Internal Revenue Service and received her Series 7 and Series 66 licenses through FINRA.

Jennifer@cambridgeconnection.biz



Jane Miller, J.D. is an Advisor Associate and related support in Michigan. She is a student in the Academic Program at the Michigan Psychoanalytic Institute studying the psychological issues baby boomers face as they enter their retirement years.

Team@cambridgeconnection.biz



Kathy Watkins, RP® owner of Turnkey Virtual Assistance, provides virtual paraplanner support for the Michigan office. She also provides executive and client administrative support to Pamela Landy. Kathy, who resides in Chicago, IL, is a graduate Verified Virtual Assistant from AssistU, a Certified Financial Planning Virtual Assistant and Paraplanner from the Alliance of Comprehensive Planners, and a Registered Paraplanner through the College of Financial Planning.

Kathy@cambridgeconnection.biz

Operations Support Staff



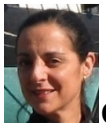
Andrew Campagna is the client administrative coordinator and operations assistant for the Michigan office, as well as executive support to Bert Whitehead. Andrew has over 25 years of management and operational experience in the retail industry.

Andrew@cambridgeconnection.biz



Carrie Comire provides virtual operations support for the company. Additionally she assists with managing the internal compliance program. She is a former U.S. Marine and currently resides in Colorado.

Carrie@cambridgeconnection.biz



Carol Johnson, RP® is the VP of Operations & Chief Compliance Officer for the firm. She handles the compliance and filings for the Securities & Exchange Commission and other operational functions of the company. Carol is a Registered Financial Paraplanner through the College of Financial Planning. Individuals who hold the RP® designation have completed a course of study including the financial planning process, disciplines, concepts & terminology. She is also certified as an ISO 9000 Internal Auditor and documentation specialist.

Carol@cambridgeconnection.biz



Clients are supported by a team where all processes are subject to review for accuracy and consistency. Client concerns or complaints may be directed to the Head of Compliance, Carol Johnson, at 800-224-1040 or

carol@cambridgeconnection.biz



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