

Item 1 – Cover Page



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March 29, 2011

This Brochure provides information about the qualifications and business practices of NetInvestmentAdvisor.com, Inc ("NIA"). If you have any questions about the contents of this Brochure, please contact Katherine Price, Chief Compliance Officer at (706) 833-3704 or Katherine@@netinvestmentadvisor.com. It is intended to provide clients and prospective clients with an understanding of the investment advisory services offered by NIA and to provide full and fair disclosure of any conflicts or potential conflicts of interest associated with those services.

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. NetInvestmentAdvisor.com, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about NetInvestmentAdvisor.com, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United States Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated March 29, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Brochure is materially different in structure and requires certain new information that our previous brochure did not require.

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. We will also reference the date of our last annual update of our brochure.

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 materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year, or at any time an interim update is required.

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

Our Brochure may be requested by contacting Katherine Price at (706) 833-3704 or katherine@netinvestmentadvisor.com.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	4
Item 6 – Performance-Based Fees and Side-By-Side Management	5
Item 7 – Types of Clients.....	5
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	5
Item 9 – Disciplinary Information	6
Item 10 – Other Financial Industry Activities and Affiliations.....	6
Item 11 – Code of Ethics	6
Item 12 – Brokerage Practices	7
Item 13 – Review of Accounts	7
Item 14 – Client Referrals and Other Compensation.....	8
Item 15 – Custody	8
Item 16 – Investment Discretion.....	8
Item 17 – Voting Client Securities	8
Item 18 – Financial Information.....	9
Brochure Supplement – Eugene M. Howerdd	10
Privacy Practices Notice	12

Item 4 – Advisory Business

Eugene M. Howerdd formed NetInvestmentAdvisor.com, Inc. in 2003.

NIA provides non-discretionary investment advice to individuals, pension plans, banks, associations and other organizations through our interactive website. Clients complete an Investment Objectives Questionnaire to identify a their investment objective and risk tolerance. Based on the responses, NIA will recommend a model portfolio appropriate for the client's circumstances. NIA's model may encompass various asset classes and types of securities. Clients are not able to limit the investment options available in the models. NIA provides clients with changes to the model as necessary, but does not execute trades on behalf of the client.

NIA may partner with various program sponsors and/or plan administrators to offer asset allocation services to plan participants on a discretionary or non-discretionary basis. These services may be provided through a direct relationship with the plan sponsor or through a third-party such as an administrator or consultant. NIA assists these financial intermediaries with developing and implementing investment programs for its clients/participants through 401k's, 403b's, variable annuities, taxable savings and health savings accounts. NIA will establish several model portfolios within various risk parameters that can be selected by the participants. NIA may offer additional tools through an interactive website to assist plan participants in assessing their risk profile and selecting an appropriate asset allocation model.

NIA engages the services of Horizon Investments, LLC ("Horizon"), a registered investment advisor, for implementation of NIA's asset allocation recommendation. Depending on the particular program, Horizon may provide models only to the client, or Horizon may initiate transactions on behalf of the client. NIA provides Horizon Investments, LLC disclosure brochure to clients.

Because NIA provides model portfolio recommendations and does not provide investment supervisory services, NIA does not have any assets under management to report.

Item 5 – Fees and Compensation

The advisory fee covers only the portfolio management and advisory services provided by NIA and does not include brokerage commissions, mark-up and mark-downs, exchange fees, dealer spreads or other costs associated with the purchase and sale of securities, custodian fees, transfer fees, wire fees, interest, taxes, or other account expenses. All fees paid to NIA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or in conjunction with internal expenses associated with exchange-traded funds or variable annuity sub-accounts. The client will be solely responsible, directly or indirectly, for these additional expenses. NIA does not receive any portion of these additional fees. Refer to Item 12 for a detailed discussion of brokerage practices.

As discussed in Item 4, NIA entered into an arrangement with Horizon Investments, LLC, a registered investment advisor. Horizon acts as a sub-advisor and is compensated directly by NIA, not by the client.

Advisory Services for Individuals:

NIA charges a quarterly fee of \$30 each for service. These fees are not negotiable. Fees are payable in advance at the beginning of the quarter. Advisory agreements may be cancelled by either party at any time by accessing the My Services page on the NetInvestmentAdvisor.com website and un-checking the "Auto Renew" option. The account will be terminated as of the next quarterly billing period.

When signing up for NIA's advisory services at NetInvestmentAdvisor.com, clients are required to provide NIA with a credit card or debit card with which to bill the quarterly fee.

Advisory Services for Program Sponsors:

There is no standard fee schedule for investment advisory services provided to program sponsors. Fees are determined based on various factors specific to the plan, such as amount of assets, number of participants, and services provided by NIA. Fees may be based on assets under management, fixed fee, or any other means agreed upon by the parties. NIA may receive fees directly from the client, or the custodian or program sponsor may pay them. Advisory fees, including payment terms and conditions, will be detailed in the advisory agreement.

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

NIA does not charge any performance-based fees.

Item 7 – Types of Clients

NIA provides non-discretionary investment advice to individuals, pension plans, banks, associations and other organizations through our interactive website.

There is no minimum account size for clients to utilize NIA's advisory services. Programs available through financial intermediaries may have minimum account values or minimum fees that apply.

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

NIA uses fundamental analysis and concepts derived from modern portfolio theory to construct diversified portfolios using an asset allocation strategy. NIA creates several model portfolio allocations with varying degrees of risk. NIA provides the client with an

Investment Objectives Questionnaire to assist the client in identifying the appropriate portfolio to select.

Investing in securities involves risk of loss that clients should be prepared to bear. NIA uses its best judgment and good faith efforts in providing advisory services to clients. NIA cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Not every investment decision or recommendation made by NIA will be profitable. Investments in securities are subject to various market, currency, inflation, economic, political and business risks. NIA attempts to minimize these risks by recommending diversified portfolios constructed to meet the specific goals and objectives of clients.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of NIA or its management. NIA has no disciplinary actions to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Eugene Howerdd is the owner of Howerdd Financial Corporation, a financial and business consulting company, which assists financial product providers in: building marketing plans that strengthen relationships with their clientele; designing and packaging financial products to offer to their clients; and introducing and establishing relationships with distribution networks. Compensation is on an annual retainer basis or as a percentage of provider's fee by the corporate client. Howerdd Financial Corporation may provide consulting services to entities that also have a business relationship with NIA.

Mr. Howerdd is also the controlling stockholder in Round Hill Estates Inc., a family real estate holding and development company. Over the years, Round Hill Estates has developed and operated hotel, golf club and related properties as well as shopping centers and office properties.

Mr. Howerdd may, at times, develop other businesses that may or may not be related to the advisory activities of NetInvestmentAdviser.com. In the case where outside business activities pose a conflict to NetInvestmentAdviser.com's clients, the conflicts will be adequately disclosed.

Item 11 – Code of Ethics

NetInvestmentAdvisor.com, Inc. has adopted a Code of Ethics pursuant to Rule 204A-1 of the Investment Advisers Act of 1940. The Code of Ethics sets a standard of professional conduct, requires certain restrictions on personal trading practices, addresses the proper

handling of material non-public information and safeguarding of sensitive information, and requires regular reporting of securities transactions and holdings.

NIA and its employees may purchase or sell the same securities in their personal accounts as recommended for clients. NIA offers model portfolio to clients primarily invested in mutual funds and exchange-traded funds and does not execute transactions on behalf of clients, thus limiting the opportunity for conflicts of interest to arise.

In order to detect any conflicts of interest with regard to personal trading by employees, NIA requires employees to submit personal securities holdings reports within 10 days of being hired and annually thereafter, and personal securities transaction reports within 30 days of the end of each calendar quarter. Employee trading is monitored by the Chief Compliance Officer to reasonably prevent conflicts of interest between our clients and us. A copy of NIA's Code of Ethics may be obtained by written request to Katherine Price, Chief Compliance Officer, at Katherine@netinvestmentadvisor.com.

Item 12 – Brokerage Practices

NIA does not receive any soft dollar benefits as a result of the advisory services provided to clients.

NIA does not execute transactions on behalf of individual clients. Where NIA provides an asset allocation model, clients are responsible for initiating trades through the broker of their choice.

To the extent that the advisory services provided by NIA imply some level of discretion, NIA depends on the services of its sub-advisor, Horizon Investments, LLC, to initiate changes to the client's investment portfolio. These services are provided through plans or investment programs, such as 401k plans or health savings accounts, where we have no authority or ability to execute trades through any broker other than the program sponsor. Horizon initiates the trades by communicating the investment allocation of each model to the plan sponsor or custodian.

Item 13 – Review of Accounts

In connection with utilizing NetInvestmentAdvisor.com's services for individuals, clients will complete an Investment Objectives Questionnaire containing questions regarding the client's financial situation, individual needs, and investment objectives. NetInvestmentAdvisor.com does not review individual client portfolios, as NIA does not have access to such information. Instead, model portfolios are updated quarterly and clients are responsible for accessing the NetInvestmentAdvisor.com website to check for any recommended changes.

For advisory services available through program sponsors, models are updated each quarter as deemed necessary by Horizon. Participant accounts are not reviewed separately from the model.

NetInvestmentAdvisor.com does not issue any statements or reports to clients. Clients receive statements directly from the custodian of their account.

Item 14 – Client Referrals and Other Compensation

NIA entered into an agreement with PilotHSA whereas PilotHSA offers NIA's model portfolios to participants in PilotHSA's health savings account program. PilotHSA serves as the administrator to the program and receives separate compensation in that capacity. PilotHSA may also serve in other capacities for NIA and receive compensation from NIA for that activity. PilotHSA hosts the website developed by NIA which facilitates the account opening and maintenance process and receives \$1 per month per account for web hosting services. PilotHSA also provides recordkeeping and other administrative services for NIA and receives \$1 per month for every \$10,000 in account value (or part thereof) for administrative services. Clients do not pay any additional fees as a result of this arrangement. Although PilotHSA's compensation is based on these services provided and not intended as compensation for client referrals, the benefit PilotHSA receives under this arrangement will nonetheless increase as the number of accounts increases.

Item 15 – Custody

NIA does not have custody of client.

Item 16 – Investment Discretion

NIA does not execute discretion over client accounts. Services for individuals entail only recommended model portfolios. NIA does not know whether these clients implement the recommended models.

In the event that NIA provides advisory services to an investment program available through a financial intermediary, the terms and conditions of the arrangement may require NIA to implement portfolio changes as the recommended model changes. In such cases, Horizon Investments, LLC as sub-advisor will be responsible for implementing the model changes in client accounts.

Item 17 – Voting Client Securities

NIA does not take action or render any advice with respect to voting of proxies for the securities in client accounts. NIA will have no obligation to render advice or take any

action with respect to any securities subject to any legal proceedings, such as class action lawsuits or bankruptcy. Clients will receive all proxies and other solicitations directly from their custodian.

Item 18 – Financial Information

Registered investment advisers are required to provide certain financial information or disclosures about their financial condition. NIA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to its clients, and has not been the subject of any bankruptcy proceeding.

Brochure Supplement – Eugene M. Howerdd



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This Brochure Supplement provides information about Eugene M. Howerdd that supplements the NetINvestmentAdvisor.com, Inc. Brochure, which is attached to this document. Please contact Katherine Price, Chief Compliance Officer at (706) 833-3704 or Katherine@netinvestmentadvisor.com if you have any questions about the contents of this supplement.

Additional information about Eugene M. Howerdd is available at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Year of Birth 1934

Education

B.S., Georgetown University, 1956

Work History

NetInvestmentAdvisor.com, Inc.	Principal	2003 – Present
Howerdd Financial Corporation	President	1989 – Present
Round Hill Estates Inc.	President	1965 – Present

Disciplinary Information

There are no disciplinary actions to disclose.

Other Business Activities

Eugene Howerdd is the owner of Howerdd Financial Corporation, a financial and business consulting company, which assists financial product providers in: building marketing plans that strengthen relationships with their clientele; designing and packaging financial products to offer to their clients; and introducing and establishing relationships with distribution networks. Compensation is on an annual retainer basis or as a percentage of provider's fee by the corporate client. Howerdd Financial Corporation may provide consulting services to entities that also have a business relationship with NIA.

Mr. Howerdd is also the controlling stockholder in Round Hill Estates Inc., a family real estate holding and development company. Over the years, Round Hill Estates has developed and operated hotel, golf club and related properties as well as shopping centers and office properties.

Additional Compensation

Eugene Howerdd does not receive compensation or other economic benefit from any third party in connection with the advisory services offered to clients.

Supervision

Eugene Howerdd is the sole principal of NetInvestmentAdvisor.com, Inc. and is responsible for all supervisory functions.

Privacy Practices Notice

NetInvestmentAdvisor.com respects your right to privacy and is committed to protecting it. In order for us to be able to provide you with our advisory services, we need to collect certain information from you. We do not sell the information you have entrusted to us to third parties, and we disclose your personal information only as necessary to provide your financial products and services. To help you understand how we protect your personal information, this notice describes our current privacy policy and practices. During the continuation of your relationship with NetInvestmentAdvisor.com, we will advise you of our privacy policy and practices at least once annually in accordance with law.

Non-public Information Collected

We collect information about you. We do this to help identify you as our customer or our former customer, to process your requests quickly, or to provide investment advisory services to you. Information we collect include:

- Information from you upon NetInvestmentAdvisor.com application forms such as your name, date of birth, marital status, sex, financial and credit card number.
- Information about your retirement needs and investment strategy to meet your goals.

Non-public Information Disclosed

NetInvestmentAdvisor.com may share the information described above with our service providers. These providers may require access to information about you to process services you have requested and to provide efficient customer service. Our service providers may be affiliated or unaffiliated, and may include financial service providers. Please be assured that we require these service providers to safeguard your personal information and to use or disclose it only for the work they are performing on our behalf, or as permitted by law.

We may have to provide the above described non-public information that we collect to authorized persons or entities to comply with a subpoena or summons by federal, state or local authorities and to respond to judicial process or regulatory authorities having jurisdiction over our company for examination, compliance or other purposes as required by law.

Confidentiality and Security of Your Non-Public Personal Information

Keeping your information secure is one of our most important responsibilities. We restrict access of non-public personal information about you, to only those persons who need to know about that information to service your account. We maintain physical, electronic, and procedural safeguards that comply with state and federal standards to guard your non-public personal information.

Information About Former Customers

We maintain non-public information about our former customers on a confidential and secure basis. If any such disclosures were made, it would be for reasons and under the conditions described in this notice. We do not disclose any non-public personal information about our former customers to anyone except as permitted or required by law.

We will maintain personally identifiable information about you during the time you are a customer, and at least for the time period thereafter that such records are required to be maintained by federal securities laws. If we choose to dispose of records after the required retention period, documents containing personally identifiable information will be destroyed.

Maintaining the Accuracy of Customer Information

Keeping your account information accurate and up to date is very important. If you believe that an item or personal information may be materially inaccurate, you may notify us electronically of any corrections, amendments or deletions you believe should be made. We will correct any erroneous information as quickly as possible. Questions about your personal information should be sent to: questions@netinvestmentadvisor.com.