

SSN Advisory, Inc. |

Form ADV Part 2A – Appendix 1

PRMPlus Wrap Fee Program Brochure

Item 1 – Cover Page

This wrap fee program brochure provides information about the qualifications and business practices of SSN Advisory, Inc (SSNAI). If you have any questions about the contents of this brochure, please contact us at 800/264-5499. 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 does not imply a certain level of skill or training.

Additional information about SSNAI also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published "Amendments to Form ADV" which amends the disclosure document that we provide to clients as required by SEC Rules. The PRMPlus Wrap Fee Program is a new service provided by SSNAI, as such this Brochure dated November 13, 2012 is a new document prepared according to the SEC's new requirements and rules.

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.

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Item 4 – Services, Fees and Compensation

SSNAI is an investment advisor registered with the Securities and Exchange Commission (SEC) since April 2003. SSNAI is owned by a FINRA member introducing broker-dealer firm, Securities Service Network, Inc. (SSN). SSN is a fully disclosed introducing broker-dealer. More information on SSN is available in the Item 9, Additional Information on page 6. SSNAI offers financial planning and consulting services, asset management services, referrals to third party investment advisors and wrap fee programs. This brochure describes the PRMPlus Wrap Fee Program (PRMPlus), which is sponsored by SSNAI. For information and descriptions of SSNAI's other advisory services, please refer to the SSNAI Form ADV Part 2A which you may obtain from your Investment Advisor Representative or from www.adviserinfo.sec.gov.

PRMPlus is a discretionary asset management program, offered through Investment Advisor Representatives of SSNAI and by other registered investment advisers (collectively referred to as Solicitor or Solicitors). For PRMPlus, SSNAI uses the asset allocation, manager selection, and portfolio construction services of a Discretionary Sub-advisor (Sub-advisor). Currently, the only Sub-advisor utilized is JA Forlines Global Investment Management (JFG), who manages the Global Tactical Allocation portfolio. When you choose JFG to manage money, you will open a brokerage account through SSN utilizing Pershing, LLC (Pershing), as custodian, and grant JFG trading discretion over the investments in the account. SSN and Pershing provide a trading platform for JFG and JFG never receives any commissions on trading transactions. JFG's total fee is predetermined in advance by Agreement with SSN and is solely determined as a flat percentage of assets under management. JFG is not a party to the Broker/Dealer-Client Agreement except as to designation as manager.

Investment Philosophy:

The Global Tactical Allocation (GTA) portfolio is the flagship portfolio for JFG and was inceptioned in 2004. It is a core portfolio that contains three asset classes in one brokerage account—equities, fixed income and alternatives (commodities, real estate and hard assets). The macro top-down approach strategy targets long term global macro-economic trends while analyzing shorter term economic variables in assessing potential price movements in the three main asset classes. All non-cash positions are ETFs, giving JFG immense flexibility in terms of low cost asset allocation. The GTA holds fixed income investments in almost all market conditions, but there is wide discretion in holding percentages of equities and alternatives. All of JFG's investments are global and usually include foreign bonds and equities. It is important to note that this portfolio is a "core" investment vehicle. Therefore, a conscious effort is made to hold down trading costs, despite having the ability to make tactical shifts in strategy.

Investment Decision-Making Process:

In December of each year, JFG starts with a relative risk and return rating of the three major asset classes (global equities, global fixed income and alternatives) given the current credit cycle and then combine this rating with their long term "secular view", i.e. what and where in the 5-10 year trend is a particular asset class and what investment ideas will work over the course of a given investment year.

JFG's seeks to have success in managing money will based on a combination of three factors.

- First, properly defining the long-term secular investing environment globally referred to above. Underlying each of the four long term periods we have experienced since 1946 are investment themes that tend to affect the relative performance of the three major asset classes JFG tracks.
- Second, JFG closely follows the credit cycles in the G-7 and E-10 countries which define the absolute level and direction of rates, and thus impact shorter term performance variations in asset prices.
- Third, in any given year, there are imbalances which require tactical shifts. Imbalances are typically created by systemic shocks, political news or a combination of both.

JFG's Portfolio Managers and Senior Advisors spend the bulk of their time analyzing macro and market data points and consulting a variety of "non- Wall Street" contract research. Research sources are particularly deep in Asia, Latin America and Europe and JFG often draws from University and other non-financial sources for primary research. While JFG devotes primary attention and research to the long-term secular view, the firm's portfolios are tactically managed in response to changes in shorter- term economic, business and credit cycles.

JFG utilizes Global Macro analysis which takes in account the performance of asset classes at different periods in a credit cycle as its main method of analysis. Other methods of analysis include charting analysis, technical analysis, and other cyclical analysis. JFG overlays a risk analysis by security each month; this risk analysis incorporates currency-adjusted standard deviation. JFG uses both long term and short term trading strategies. Cyclical analysis involves the analysis of business and credit cycles to find favorable conditions for buying and/or selling a security and assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold:

1. The markets do not always repeat cyclical patterns, and
2. If too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Long term trading is designed to capture market rates of both return and risk. Frequent trading can affect investment

performance, particularly through increased brokerage and other transaction costs and taxes. Short term trading generally hold greater risk and Clients should be aware that there is a material risk of loss using any of those strategies.

Portfolio Construction:

The GTA portfolio managed by JFG typically contains 10-20 exchange traded products. Asset allocation ranges are set on an annual basis and updated at least monthly. In addition, JFG communicates to Reps and Advisors bi-weekly through Advisor Updates.

The major difference in JFG's approach from main line "bottoms-up" fund managers has to do with sub-asset class allocations, which have been critical to performance since 2000. An example of the traditional approach is an over-reliance on "cap style" as a main factor relevant to U.S. stocks.

JFGs' approach, once broad equity, fixed income and alternatives ranges are selected, is to rate and pick a variety of sub-asset ETFs based on their risk/return rating. Drilling down further, there are sectors within each sub-asset class that are in turn rated. This approach seeks to provide a far more sophisticated and global sector rotation than is found in most domestic U.S. mutual funds.

JFG uses proprietary methodology to rate risk in each holding and the portfolio as a whole. It is based on a combination of value and macro analysis that seeks to avoid much of the "whip-saw" problems inherent in purely technical trading methodologies.

Prior to recommending the JFG Portfolio, your Solicitor will review the investment objectives, financial and tax status, risk tolerance and time horizon information you provide. The Portfolio is not structured to meet the needs or objectives of specific clients; rather, clients are matched with the Portfolio if it is in line with the client's stated goals and objectives. There are no client imposed restrictions or tailored services available.

The total annual fee (Fee) for PRMPlus is a percentage of all account assets under management (AUM) and is negotiable between you and your Solicitor. The maximum Fee is 2.50%. The Fee schedule is tiered, which means that each level of assets is charged its own corresponding percentage rate. For example, a tiered fee schedule might charge 2.50% on the first \$499,999.99 and 2.00% on the next \$500,000.00, effectively giving you a blended and lower rate than the maximum 2.00%. Fees are calculated monthly in arrears based on the prior period's average daily account balance and are debited from your account. The Fee includes a platform fee and a solicitor's fee payable to your Solicitor. The platform fee is non-negotiable and includes custody, trading, and performance reporting costs. The maximum platform fee will be the greater of \$83.33 per month (\$1,000 annually) or 1.00% of AUM. The portion of the Fee in excess of the platform fee will be paid by SSNAI to your Solicitor as a solicitor's fee. PRMPlus may cost you more or less than purchasing similar services separately. Factors to consider include the type and size of the account, the securities to be bought or sold and the your historical and/or expected size or number of trades. Your Fee may be more or less than the Fee of other PRMPlus clients. SSNAI does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets). Multiple accounts will not be "household" or combined for billing purposes. The maximum Fees are outlined below:

Assets Under Management	Total Maximum Annual Fee	Platform Fee
\$0.00 - \$249,999.99	2.50%	1.00%
\$250,000.00 - \$499,999.99	2.50%	0.95%
\$500,000.00 - \$999,999.99	2.50%	0.90%
\$1,000,000.00 - 2,499,999.99	2.50%	0.80%
\$2,500,000.00 - \$4,999,999.99	2.50%	0.75%
\$5,000,000.00 - \$9,999,999.99	2.50%	0.65%
\$10,000,000.00 - Unlimited	2.50%	Negotiable

SSNAI will deduct the Fee directly from clients' accounts but does not otherwise have custody of clients' funds or securities. Deduction of the Fee will be made by the qualified custodian holding your funds and securities. Further, the qualified custodian agrees to deliver a monthly or quarterly account statement directly to you, and never through SSNAI, showing all disbursements from the account. You are encouraged to review all account statements for accuracy. SSNAI will receive a duplicate copy of the statement that was delivered to you in order to form a reasonable belief that such statements are delivered to you. You may terminate authorization for automatic deduction of the Fee by notifying your IAR in writing. In turn, your IAR will notify the SSNAI home office promptly.

Some Solicitors may generate account statements or performance reports for clients. You are urged to compare the account statements from the custodian with those from your Solicitor.

If assets are transferred in-kind into your account, such assets may be liquidated at the discretion of SSNAI and JFG. In this situation, you will be responsible for any and all transaction charges (including ticket charges, confirmation fees, deferred sales charges and short term redemption fees) related to such liquidations. You will be responsible for any and all transaction charges related to any transaction placed at your direction. This includes liquidations for account transfers and money movement requests (checks, wire transfers, electronic fund transfers, ACAT, etc.). Additionally, the custodian of your account may impose additional fees for checks, wire transfers, electronic fund transfers, etc. You may pay other fees as required by law. You may pay short term redemption fees on certain mutual fund transactions. You will pay separately for IRA custodial services. All fees paid to SSNAI for investment advisor services are separate from fees and expenses charged to owners of mutual fund shares and ETF shares by the investment companies. As a result, you may pay two management fees. SSN may, from time-to-time, receive 12b-1 fees or trail commissions from investment companies in connection with the placement of funds into investment companies. The default fund for your cash balances is a money market mutual fund that pays a 12b-1 fee to SSN; this may result in a lower return on your cash investments than if your cash were invested in a money market mutual fund that did not pay a 12b-1 fee. A complete explanation of the product-related fees and expenses is contained in the prospectus for each particular investment product.

Item 5 – Account Requirements and Types of Clients

The minimum account size for PRMPlus is \$100,000. If your account should fall below this minimum, your account may be closed. SSNAI makes PRMPlus available to individuals, IRAs, trusts, estates, charitable organizations, and corporations or business entities.

New deposits to your account will be invested as soon as is practical, but no later than quarterly.

Systematic Withdrawal Plans (SWP) may be set up for monthly distribution on the 15th of the month and may not exceed 6% of the account per annum.

With the exception of cash available for a SWP, accounts will not hold assets that are not part of the Portfolio.

Accounts are carried by Pershing, LLC, Member NYSE/SIPC.

Item 6 – Portfolio Manager Selection and Evaluation

SSNAI acts as portfolio manager for PRMPlus. This creates a conflict of interest in that SSNAI bears the costs related to trading activity, thus giving SSNAI incentive to reduce trading activity in your account. This conflict of interest is addressed due to the fact that SSNAI relies on the Sub-advisor to make all changes in Portfolio allocations and fund selections on a discretionary basis.

SSNAI conducts a detailed review of the services and disclosures provided by a Sub-advisor prior to adding the Sub-advisor to PRMPlus. This analysis includes a review of the following characteristics: ownership, asset selection methodology, investment selection methodology, attention to compliance issues, marketing and support ability, computer technology, and research capabilities. SSNAI does not review the calculation of, or verify the accuracy of, any performance information provided by Sub-advisors. Currently, JFG is the only Sub-advisor selected for PRMPlus.

SSNAI relies on its Sub-advisor for all Portfolio analysis, strategies and recommendations. Currently the sole investment strategy utilized in PRMPlus is the JFG Global Tactical Allocation strategy.

Investing in securities involves risk of loss that you should be prepared to bear.

Risks associated with the Portfolios include:

- Capital risk – The risk that your investments may lose value.
- Currency risk – If the assets you invest in are held in another currency there is a risk that currency movements alone may affect the value.
- Financial risk – The risk that there may be a disruption in the internal financial affairs of the investment, thereby causing a loss of value.
- Market risk – The risk that the value of a security or portfolio will decrease due to the change in value of the overall market.
- Credit risk – The risk of loss arising from a borrower who does not make payments as promised.
- Interest rate risk – The risk that an interest-bearing asset, such as a bond, will lose value due to variability of interest rates. In general, as rates rise, the price of a fixed rate bond will fall, and vice versa.

Underlying ETFs are subject to the following risks:

- The market price of an underlying ETF's shares may trade above or below net asset value.
- There may be an inactive trading market for an underlying ETF.
- The underlying ETF may employ an investment strategy that utilizes high leverage ratios.
- Trading of an underlying ETF's shares may be halted, delisted, or suspended on the listing exchange.
- The underlying ETF may fail to achieve close correlation with the index that it tracks.

Neither SSNAI nor JFG votes client securities.

Item 7 – Client Information Provided to Portfolio Managers

Your Solicitor will obtain all information necessary to open your account. This information is obtained through the completion of the SSN New Account Form, PRMPlus Client Advisory Services Agreement, and applicable custodian new account paperwork and is provided to SSNAI.

From time-to-time, SSNAI will provide its Sub-advisors a report, for fee billing purposes, aggregated assets for each of the Portfolios. JFG will have full access to your account at the custodian and will have full discretionary trading authority on your account.

Item 8 – Client Contact with Portfolio Managers

You may not contact SSNAI or the Sub-advisor directly. You may contact your Solicitor for questions, to update personal information, or to obtain account information.

Item 9 – Additional Information

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 SSNAI or the integrity of SSNAI's management.

SSNAI is owned by a FINRA member introducing broker-dealer firm, SSN. The State of Florida Department of Banking and Finance named SSN in an administrative complaint alleging that it failed to supervise a former registered representative in the sale of variable annuities to two clients, a husband and wife. The matter was settled on December 21, 2002 via a stipulation and consent agreement. SSN was fined \$2,500 and ordered to pay \$12,438.38 to the state representing a return of commissions. SSN was further ordered to cease and desist from any and all violations of the Securities Act.

Other Financial Industry Activities and Affiliations

The principal business of SSNAI is the provision of advisory services. SSNAI is owned by SSN, a fully disclosed FINRA member introducing broker-dealer firm. Accounts are carried by Pershing, LLC, Member NYSE/SIPC. SSNAI's executive officers are registered representatives SSN. SSN receives transaction costs and charges assessed to its clients accounts. This gives SSNAI incentive to recommend SSN in its capacity as a broker-dealer if you are in need of brokerage and/or custodial services. Lower fees for comparable services may be available from other sources. This conflict of interest is fully disclosed to you in this brochure.

SSN owns and operates a full service insurance agency under the name of Network Agency, Inc. SSN also has a number of state specific insurance corporations that conduct insurance business across the country; Network Agency of Alabama, Inc., Network Agency of Ohio, RSB, Inc., SSN Agency of Texas, Inc., SSN Agency, Inc., and SSN Insurance Agency, Inc. Other affiliated entities are Renaissance Capital Corporation, which purchases equipment that is leased to SSN/SSNAI, and Fort Loudon Insurance Co, Ltd., and insurance agency for errors and omissions insurance for registered representatives of SSN.

SSNAI or SSN may receive administrative, investment advisory or other fees for providing support services, administrative support and/or client referrals to other investment advisory firms. If applicable, these arrangements are fully disclosed to you.

Through SSN's Strategic Conference Partnership Program, SSN receives revenue sharing payments from certain product providers. SSN Strategic Partners have the opportunity to place articles in our monthly publication, Network News, include

monthly inserts in our representative's pay packages, advertise on our intranet, and receive Strategic Partner status on SSN's Approved Products List. This program presents a conflict of interest and gives SSNAI or your Solicitor incentive to recommend investment products based on the compensation received, rather than on your needs. These conflicts, which are disclosed in this brochure, are addressed through ongoing training, annual compliance meetings, and a review of all transactions by SSNAI's compliance staff.

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

Pursuant to SEC Rule 204A-1, SSNAI has adopted a Code of Ethics for all access persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the personal securities transactions, trading, confidentiality and privacy, prohibition on insider trading, conflicts of interest, outside affiliations, and fair compensation, among other things. All supervised persons at SSNAI must acknowledge the terms of the Code of Ethics. The firm will provide a copy of our Code of Ethics to any client or prospective client upon request.

SSNAI does not engage in principal transactions as an investment advisor. SSN, as a broker-dealer, may engage in such transactions, however, not for any SSNAI investment advisor account transaction.

SSNAI, as an investment advisor, does not affect transactions for compensation for any investment advisor clients. SSN may do so in its capacity as a broker-dealer. SSN will receive transaction costs and charges assessed to the investment advisor clients.

SSNAI does not affect agency cross transactions for any investment advisor clients. SSN may do so in its capacity as a broker-dealer.

SSNAI does not recommend securities or investment products to its investment advisor clients in which SSNAI has a financial interest other than fully disclosed commissions or referral fees. SSN may do so in its separate capacity as a broker-dealer.

SSNAI or individuals associated with SSNAI may buy or sell securities identical to those recommended to customers for their personal accounts. All such orders placed on the same day must be placed in the customers' account prior to being placed in the IAR's account. Additionally, any related person(s) may have an interest or position in certain securities that may also be recommended to a client. As such, transactions are likely to be statistically insignificant in relation to the market as a whole.

SSNAI does not permit the aggregate blocking of personal securities transactions with those of advisory clients.

As these situations may represent a conflict of interest, SSNAI has established the following restrictions in order to comply with its fiduciary responsibilities:

- a. A director, officer or employee of SSNAI shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public upon reasonable inquiry. No director, officer or employee of SSNAI shall prefer his or her own interest to that of the advisory client.
- b. SSNAI maintains a record of securities holdings via account statements for itself, and anyone associated with its advisory practice with access to advisory recommendations. An appropriate officer or manager of SSNAI reviews these statements on a regular basis.
- c. SSNAI emphasizes the unrestricted right of the client to decline to implement any investment advice rendered, except in situations where SSNAI is granted discretionary authority over the client's account.
- d. SSNAI requires that all directors, officers and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- e. Any director, officer or employee of SSNAI found to have failed to observe the above-listed principles may be subject to internal disciplinary sanctions, which may include termination.

Review of Accounts

Clients participating in PRMPlus will have their accounts reviewed on a periodic basis, but no less frequently than each calendar quarter by SSNAI or Solicitor. JFG will review client accounts no less than monthly.

Client Referrals and Other Compensation

SSNAI as Solicitor: SSNAI, its IARs, or SSN may receive administrative, investment advisory or other fees for providing support services, administrative support and/or client referrals to other investment advisory firms. If applicable, these arrangements are fully disclosed to you.

SSNAI's Use of Solicitors: SSNAI may compensate outside professionals or firms, such as attorneys, accountants, or other broker/dealers and investment advisers, for referring your advisory business to SSNAI. These professionals or firms are known as Solicitors. SSNAI will pay a portion of the advisory fee you pay us to the Solicitor, typically for as long as you maintain an

advisory relationship with us, to compensate the Solicitor for the referral. SSNAI will not charge a client who is referred to SSNAI by a Solicitor any amount for the cost of obtaining the client that is in addition to the fee normally charged by SSNAI for its investment advisory services. Such solicitation arrangements are disclosed to clients at the time of the solicitation via execution of a Solicitor Disclosure Statement or similar document that outlines the nature and amount of the compensation we pay to the Solicitor and whether or not the Solicitor is affiliated with or related to SSNAI. Solicitors are required to provide prospective clients with a current copy of SSNAI's Form ADV Part 2 no later than the date on which the client enters into an advisory relationship with SSNAI.

General Responses: Your IAR may receive non-cash compensation in the form of due diligence trips or marketing support from product sponsors. Non-cash compensation will not be based on the number or amount of sales, client referrals, or new accounts. This presents a conflict of interest and gives your IAR an incentive to recommend investment products based on the non-cash compensation received, rather than on your needs.

Financial Information

SSNAI 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.