

Resource Horizons Investment Advisory, Inc.

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Disclosure Brochure

March 28, 2011

This brochure provides information about the qualifications and business practices of Resource Horizons Investment Advisory, Inc. If you have any questions about the contents of this brochure, please contact us at 770.319.1970. 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.

Resource Horizons Investment Advisory, 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 Resource Horizons Investment Advisory, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov

Material Changes

On August 12, 2010, the United States Securities and Exchange Commission (“SEC”) published “Amendments to Form ADV” which requires us to provide clients and prospective clients (“you, your, yours”) with a brochure and brochure supplements written in plain English. This brochure dated March 28, 2011 is prepared according to the SEC’s new requirements and rules. As a result, we are providing you with a brochure that not only looks different, but contains more information than our earlier disclosure documents.

In the past Resource Horizons Investment Advisory (“RH Advisory, we, us, our, ours”) have offered or delivered information about our qualifications and business practices to clients on an annual basis. Going forward, we will see that you receive a summary of any material changes to our brochures by April 29th of each year. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes will include the date of our last annual update of our brochure.

Currently, our brochure may be requested by contacting Laura Tedball, Chief Compliance Officer at 770.319.1970 or via email at compliance@resourcehorizons.com

Our brochure is also available on our website <http://www.resourcehorizons.com>. We will provide you with a new brochure at any time without charge.

Additional information about our company is also available via the SEC’s website: www.adviserinfo.sec.gov.

The SEC’s website also provides information about any persons affiliated with Resource Horizons who are registered as investment adviser representatives of Resource Horizons. Information on our investment adviser representatives who work with your account can be found in our brochure supplements on the page shown in the table of contents to the right of this column.

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Advisory Business

Resource Horizons Investment Advisory, Inc. is a corporation organized under the laws of Georgia. David Miller founded the Marietta, GA-based investment advisory firm in 2007 and is the principal owner. Resource Horizons Investment Advisory, Inc. is a SEC registered investment advisory firm.

Resource Horizons Investment Advisory, Inc. (“RH Advisory”) provides such services through investment advisory representatives doing business under the following names: Benefit Planning, Benefit Planning Advisors, Benefit Planning of California, the DGR Group, First Financial Resources, Financial Destiny, Financial Partners Wealth Management, Integrated Retirement Planning, Investment Planning Solutions, LCS Financial Group, Life & Benefit Services, LifePlan Financial Advisors, MBA Financial Advisors, Navigational Wealth Planning, Oak Tree Group, PRM Financial Services, Resource Horizons Investment Advisory, Retirement Asset Management, Retirement Solutions, SMARTGroup Houston, Sun Financial Services, TGC Financial Advisory Group, and Wealth Enhancement and Preservation of GA.

Portfolio Consulting & Management Services

Product recommendations under this platform may include, but are not limited to, equities, corporate debt securities, municipal bonds, mutual funds,

government securities, and options. We directly manage and diversify your portfolios based upon your risk profile, investment horizon, financial goals, income (current and potential), tax bracket, portfolio size, net worth and other various suitability factors. Restrictions and guidelines that you impose may affect the composition and performance of portfolios. For this reason, performance of portfolios within the same investment objective may differ.

Financial Planning

We also provide financial planning advice. Clients purchasing this service will receive a written financial plan designed to achieve their stated financial goals and objectives. In general, the financial plan will address any or all of the following areas of concern: personal, tax & cash flow, death and disability, retirement and investment analysis.

We gather required information through in-depth personal interviews. Information gathered includes your current financial status, future goals and attitudes towards risk. Related documents that you supply are carefully reviewed, including a questionnaire that you complete. Typically, the financial plan will be presented to you within 90 days of the contract date, provided that you promptly make all required information available to us. You have the right to terminate an agreement within five business days after entering into it without owing us any fees.

Implementation of financial plan recommendations is entirely at the client's discretion, but RH Advisory will provide recommendations on how to implement the plan. Should a client choose to implement the recommendations contained in the plan, RH Advisory suggests the client work closely with their attorney, accountant, insurance agent, and/or stockbroker. RH Advisory is not authorized to practice law or to provide tax or legal advice.

Sudden Money® Institute Process

The Sudden Money® Institute Process is a comprehensive wealth management process designed to assist clients deal with Sudden Money events such as Inheritance, Lottery Windfall, Divorce, Career Change, Sale of Business, Settlement, Death of Spouse, Sports Contract or retirement.

Third Party Advisory Services

We have also entered into agreements with various other third party investment advisers ("Third Party Advisory Service") for the provision of certain investment advisory services. We will provide individualized advisory services to you through the selection of a suitable Third Party Advisory Service. Factors considered in the selection of a Third Party Advisory Service include but may not be limited to:

- each individual IAR's preference for a particular Third Party Advisory Service;
- your risk tolerance, goals and objectives, as well as investment experience; and,
- the amount of your assets available for investment.

In order to assist you in the selection of a Third Party Advisory Service, we will typically gather information from you about your financial situation and investment objectives.

Mergers & Acquisition Consulting

Certain Advisory Representatives may be involved in mergers and acquisition consulting. This involves acting as the Lead Advisor on a merger & acquisition transaction, coordinating the efforts of the attorney, the valuation expert, the broker of the deal, the source of funding and the potential buyer or seller. Our role is to keep the big picture in mind and to keep the deal moving. We provide advice on the pros and cons of various deal structures as well as various potential funding sources.

You should notify us promptly if there are any changes in your financial situation or investment objectives or if you wish to impose any reasonable restrictions upon the management of your account.

Management of Wrap Accounts

Portfolio Consulting and Management Services are offered on both a wrap and non-wrap basis. The fee you pay in this program covers our advisory fee and all brokerage commissions and other trading costs of transactions. We do not manage wrap fee accounts differently than we manage non-wrapped accounts. We receive a portion of the wrap fee for our services.

For more detailed information on the fees and services offered under the RH Wrap Program, please review the Schedule H of Form ADV.

As of December 31, 2010, we managed approximately \$23 million in client assets where we made all of the investment decisions. Approximately \$31 million in client assets were managed where our clients made the investment decisions based upon our recommendations.

Fees and Compensation

We offer our services on a fee-only basis. Our fee is calculated based upon the market value of the assets in your account at the beginning of the calendar quarter or on the last day of the previous quarter. The timing of the fee is determined at the time the advisory agreement is signed.

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians (“custodian/broker-dealer”). Your custodian/broker-

dealer determines the values of the assets in your portfolio.

Fees for the initial quarter are based on the value of your cash and securities on the date the custodian/broker-dealer receives them and are prorated based upon the number of calendar days in the calendar quarter that our agreement is in effect. Our fee schedule is described below:

<u>Assets Under Management</u>	<u>Advisory Fee¹</u>
\$0 to \$100,000	2.50%
\$100,001 to \$200,000	2.25%
\$200,001 to \$250,000	2.00%
\$250,001 to \$500,000	1.75%
\$500,001 to \$1,000,000	1.50%
\$1,000,001 to \$3,000,000	1.00%
\$3,000,001 and above	0.75%

¹All fees are negotiable at our sole discretion. We have the right to change any or all of its fee schedules with 30 days written notice.

You must authorize us to have the custodian/broker-dealer pay us directly by charging your account. This authorization must be provided in writing. One-fourth of the annual fee is charged each calendar quarter.

While not part of our normal practice we, reserve the right, through our relationships with certain custodians, to offer clients the opportunity to select advisory fees to be payable monthly in advance instead of quarterly in advance. The monthly advisory fees are payable

monthly in advance at the beginning of each calendar month. We charge one twelfth of the annual fee each month based on the market value of the client's portfolio as of the last day of the prior calendar month. The formula used for the calculation is as follows: $(\text{Annual Rate}) \times (\text{Total Assets Under Management at Month-End}) / 12$.

Your custodian/broker-dealer provides you with statements that show the amount paid directly to us. You should review and verify the calculation of our fees. Your custodian/broker-dealer does not verify the accuracy of fee calculations.

In addition to our fee, you may be required to pay other charges such as:

- custodial fees,
- brokerage commissions,
- transaction fees,
- internal fees and expenses charged by mutual funds or exchange traded funds ("ETFs"), and
- other fees and taxes on brokerage accounts and securities transactions.

Mutual fund companies, ETFs, and variable annuity issuers charge internal fees and expenses for their products. These fees and expenses are in addition to any advisory fees charged by us. Complete details of these internal fees and expenses are explained in the prospectuses for each investment. You are strongly encouraged to read these explanations before investing any money.

You may ask us any questions you have about fees and expenses.

If you purchase mutual funds through the custodian/broker-dealer, you may pay a transaction fee that would not be charged if the transactions were made directly through the mutual fund company. Also, mutual funds held in accounts at brokerage firms may pay internal fees that are different from funds held at the mutual fund company.

While you may purchase shares of mutual funds directly from the mutual fund company without a transaction fee, those investments would not be part of our advisory relationship with you. This means that they would not be included in our investment strategies, investment performance monitoring, or portfolio reallocations.

Please be sure to read the section entitled "Brokerage Practices," which follows later in this brochure.

You must pay our advisory fees in advance of receiving our services. Should you terminate the advisory agreement we have entered into within five (5) business days from the date the agreement is executed, you will receive a full refund of any fees paid.

Should either one of us terminate the advisory agreement we have entered into before the end of a billing period, any unearned fees that were deducted from your account will be returned to you by us. The amount refunded to you is

calculated by dividing the most recent advisory fee you paid by the total number of days in the quarter. This daily fee is then multiplied by the number of calendar days in the quarter that our agreement was in effect. This amount, which equals the amount we earned for the partial quarter, is subtracted from the total fee you paid in advance to determine your refund.

Fees for Financial Planning/ Consulting

Initial Fees – Initial Financial planning fees will be charged in one of two ways:

Fixed Dollar Fee. Fixed fees typically range from \$1500-\$5000 depending on the nature and complexity of your circumstances. Half of the fee is due upon signing of the financial planning contract. The balance is due upon presentation of the plan. For fixed financial planning fees under \$500, the entire fee is due upon signing of the financial planning contract and is refundable in its entirety if you do not accept the completed financial plan. All financial planning engagements will be completed within six months. In the event that you cancel the agreement prior to the completion of the financial plan, we will return any unearned portion of the fixed fee based upon the following calculation: the number of hours that had been put into the preparation of the plan prior to cancellation will be multiplied by the hourly rate that would have been used instead of a flat fee based on the nature and complexity of your circumstances and the experience of the

investment advisor representative providing the service. That amount will be subtracted from the fixed fee that we received at signing and will be considered the unearned portion of the fee.

Hourly Fee. Hourly rates range from \$150-\$500 per hour depending on the nature and complexity of your circumstances and the experience of the investment advisor representative providing the service. An estimate for total hours will be determined at the start of the advisory relationship and 50% of the fee is due upon signing of the financial planning contract. All financial planning engagements will be completed within six months. The balance is due upon presentation of the plan. In the event that you cancel the agreement prior to the completion of the financial plan, we will return any unearned portion of the fee based upon the numbers of hours already spent on the project.

Ongoing Fees - Because any comprehensive plan is based on future expectations, you are urged to have your plan reviewed annually in order to adapt to new and changing circumstances.

We will provide planning and/or consulting services (including investment and non-investment related matters) on a stand-alone basis. Compensation is negotiated in advance depending upon the scope of the services. Prior to engaging us to provide these ongoing services, you will generally (depending upon the scope of the engagement) be required to enter a On-Going Services

Agreement with us setting forth the terms and conditions of the engagement, the fee, describing the scope of the services to be provided, and the portion of the fee that is due from you prior to our commencing services.

The above initial and on-going fees are subject to negotiation at the discretion of management. Similar services may be available elsewhere for a lower fee. At the discretion of management, the financial planning fee may be waived if you become an asset management client within 90 days of the financial plan being presented to you.

Fees for the Sudden Money ® Institute Process

Sudden Money® Process Fee Schedule – Financial Planning Services:

Level 1: Gross income under \$100,000				
Level 2: Gross income between \$100,001-\$200,000				
Level 3: Gross income between \$200,001-\$300,000				
Level 4: Gross income over \$300,001				
Net worth	Level 1	Level 2	Level 3	Level 4
Up to \$2,000,000	\$3,000	\$3,500	\$4,500	\$5,000
\$2,000,001-\$4,000,000	\$5,250	\$5,500	\$5,750	\$6,000
\$4,000,001-\$10,000,000	\$6,250	\$6,750	\$7,250	\$8,500
Over \$10,000,000	\$6,500	\$7,000	\$9,500	\$12,000+

Fee Schedule – Financial Planning with Sudden Money Institute Process and Protocols:

Level 1: Gross income under \$100,000				
Level 2: Gross income between \$100,001-\$200,000				
Level 3: Gross income between \$200,001-\$300,000				
Level 4: Gross income over \$300,001				
Sudden Money Amount	Level 1	Level 2	Level 3	Level 4
Up to \$2,000,000	\$5,000	\$10,000	\$12,500	\$15,000
\$2,000,001-\$4,000,000	\$17,000	\$20,000	\$23,000	\$25,000
\$4,000,001-\$10,000,000	\$26,000	\$30,000	\$35,000	\$40,000
Over \$10,000,000	\$45,000	\$50,000	\$55,000	\$60,000

Fees for Third Party Advisory Services

Compensation generally consists of four elements:

- management and advisory fees shared by the Third Party Advisory Services, RH Advisory, and its IARs;
- transaction costs – if applicable – which may be paid to purchase and sell such securities;
- custody fees; and
- an additional Administrative fee paid to Resource Horizons Group, L.L.C. for its supervisory services.

You may choose from a wrapped or non-wrapped pricing option. Wrap pricing structures allow the client to pay an all-inclusive fee for management, brokerage, clearance, custody and administrative services. As an alternative to the wrap pricing structure, the Third Party Advisory Service's fee may be

separated from the advisory fee charged by the IAR and RH Advisory. Transaction costs may also be charged for the execution and clearance of advisory transactions directed by such Third Party Advisory Services. Further, compensation to the IARs may be in the form of commissions earned in the underlying securities portfolios, which are managed by the Third Party Advisory Service. From RH Advisory's share of the Third Party Advisory Fee, RHG may charge an additional administrative fee for its supervisory services.

A complete description of the programs and services provided the amount of total fees, the payment structure, termination provisions and other aspects of each program are detailed and disclosed in:

- the Third Party Investment Advisory Service's Form ADV Part II;
- the program wrap brochure (if applicable) or other applicable disclosure documents;
- the disclosure documents of the portfolio manager or managers selected; or,
- the Third Party Advisory Service's account opening documents.

A copy of all relevant disclosure documents of the Third Party Advisory Service and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

Our advisory representatives may also be registered representatives of Resource Horizons Group, L.L.C. ("RHG"), a registered broker/dealer, member FINRA/SIPC. If you choose to implement your financial plan through a financial advisor who is also registered with RHG, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition, the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Our advisory representatives are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

We may receive benefits such as assistance with conferences and educational meetings from product sponsors.

Our advisory representatives may also recommend various asset management firms. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs

associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Performance-Based Fees

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments. We do not charge performance-based fees on any of our client accounts.

Types of Clients

We provide advisory services primarily to high net worth individuals, including their trusts, estates and retirement accounts. We also provide services to corporations or business entities including their pension and profit sharing plans. As a condition for starting and maintaining an advisory relationship, we generally require a minimum portfolio size of \$25,000. We, at our sole discretion, may accept clients with smaller portfolios based upon certain factors including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing client relationships. We may consider the portfolios of your family members to

determine if your portfolio meets the minimum size requirement.

We require a minimum fee of \$1500 for full service financial planning clients, or a minimum hourly rate of \$150.

You should review the disclosure documents of other money management programs for information about account minimums.

Methods of Analysis, Investment Strategies and Risk of Loss

We select specific investments for your portfolios through the use of fundamental and technical analysis as well as charting.

Fundamental analysis is a method of evaluating a company that has issued a security by attempting to measure the value of its underlying assets. It entails studying overall economic and industry conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets, and liabilities are all important in determining the value of a company. The value is then compared to the current price of the issuing company's security to determine whether to purchase, sell or hold the security.

Technical analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but

instead use charts and other tools to identify patterns that can suggest future activity.

Charting involves identifying patterns that can suggest future activity in price movements. A chart pattern is a distinct formation on a stock chart that creates a trading signal or a sign of future price movements. Chartists use these patterns to identify current trends and trend reversals to trigger buy and sell signals. Some of the chart types are Line Charts, Bar Charts, Candlestick, Point and Figure, etc.

Although we manage your portfolio in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

Our investment strategies may include long-term and short-term purchases and sales, trading (securities sold within 30 days) and the use of options, margin, and short sales. You may place reasonable restrictions on the strategies to be employed in your portfolio and the types of investments to be held in your portfolio.

All investments involve risks that can result in loss:

- loss of principal,
- a reduction in earnings (including interest, dividends and other distributions), and
- the loss of future earnings.

Additionally, these risks may include:

- market risk,
- interest rate risk,
- issuer risk, and
- general economic risk.

Although we manage your portfolio in a manner consistent with your risk tolerances, we cannot guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

You must also be aware that the use of margin, options and short sales are higher risk strategies. It is possible to lose all of the principal you invest, and sometimes more. In a cash account, your risk is limited to the amount of money that you have invested. In a margin account, your risk includes the amount of money invested plus the amount that has been loaned to you. When you short sell, your losses can be infinite.

Disciplinary Information

We have not been the subject of any legal or disciplinary events that would be material to your evaluation of our business or the integrity of our management.

Other Financial Industry Activities and Affiliations

As explained under “Fees and Conditions” above, we are licensed as a registered representative with RHG. We are also licensed as insurance agents with

various insurance companies. These arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation your advisory representative can receive rather than based upon your needs.

As previously noted, we will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. You have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Our advisory representatives may also recommend various asset management firms through their affiliation with RHG. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

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

We have adopted a *Code of Ethics* (“*Code*”) to address the securities-related conduct of our advisory representatives and employees. The *Code* includes our policies and procedures developed to protect your interests in relation to the following:

➤ the duty at all times to place your

interests ahead of ours;

- that all personal securities transactions of our advisory representatives and employees be conducted in a manner consistent with the *Code* and avoid any actual or potential conflict of interest, or any abuse of an advisory representative’s or employee’s position of trust and responsibility;
- that advisory representatives may not take inappropriate advantage of their positions;
- that information concerning the identity of your security holdings and financial circumstances are confidential; and
- that independence in the investment decision-making process is paramount.

We will provide a copy of the *Code* to you or any prospective client upon request.

We do not buy or sell securities for our firm that we also recommend to clients. Our advisory representatives and employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account(s). The personal securities transactions by advisory representatives and employees may raise potential conflicts of interest when they trade in a security that is:

- owned by you or
- considered for purchase or sale for you.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- require our advisory representatives and employees to act in your best interest,
- prohibit favoring one client over another, and
- provide for the review of transactions to discover and correct any same-day trades that result in an advisory representative or employee receiving a better price than a client.

Advisory representatives and employees must follow our procedures when purchasing or selling the same securities purchased or sold for you.

Brokerage Practices

We generally recommend that your account be managed through our relationship with RHG, we recommend that your broker-dealer/custodian be National Financial Services (“National Financial”). National Financial will assist us in servicing your account. We are independently owned and operated and not affiliated with National Financial. Our use of National Financial is, however, a beneficial business arrangement for us and for National Financial. Information regarding the benefits of this relationship is described below.

In recommending National Financial as custodian and as the securities brokerage firm responsible for executing transactions for your portfolios, we consider at a minimum National Financial’s:

- existing relationship with us,
- financial strength,
- reputation,
- reporting capabilities,
- execution capabilities,
- pricing, and
- types and quality of research.

The determining factor in the selection of National Financial to execute transactions for your accounts is not the lowest possible transaction cost, but whether National Financial can provide what is in our view the best qualitative execution for your account.

National Financial provides us with access to its institutional trading and custody services, which includes:

- brokerage,
- custody,
- research, and
- access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

We are not required to affect a minimum volume of transactions or maintain a

minimum dollar amount of client assets to receive these services.

National Financial does not charge separately for holding our clients accounts, but may be compensated by you through other transaction-related fees associated with the securities transactions it executes for your accounts.

National Financial also makes available other products and services that benefit us but may not benefit you directly. Some of these products and services assist us in managing and administering our client accounts, such as software and other technology that:

- provide access to account data such as:
 - duplicate trade confirmations,
 - bundled duplicate account statements, and
 - access to an electronic communication network for client order entry and account information;
- facilitate trade execution, including:
 - access to a trading desk serving advisory participants exclusively and
 - access to block trading which provides the ability to combine securities transactions and then allocate the appropriate number of shares to each individual account;
- provide research, pricing information and other market data;
- facilitate payment of our fees from

client accounts; and

- assist with back-office functions, record keeping and client reporting; and
- receipt of compliance publications.

National Financial also makes available to us other services intended to help us manage and further develop our business. These services may include:

- consulting,
- publications and conferences on practice management,
- information technology,
- business succession,
- regulatory compliance, and
- marketing

National Financial may also make available or arrange for these types of services to be provided to us by independent third parties. National Financial may discount or waive the fees it would otherwise charge for some of the services it makes available to us. It may also pay all or a part of the fees of a third party providing these services to us. Thus, we receive economic benefits as a result of our relationship with National Financial, because we do not have to produce or purchase the products and services listed above.

Because the amount of our compensation or the products or services we receive may vary depending on the custodian/broker-dealer we recommend to be used by our clients, we may have a conflict of interest in making that

recommendation. Our recommendation of specific custodian/broker-dealers may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

Commissions and other fees for transactions executed through RHG may be higher than commissions and other fees available if you use another custodian/broker-dealer firm to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients by National Financial outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

Many of the services described above may be used to benefit all or a substantial number of our accounts, including accounts not maintained at through National Financial. We do not attempt to allocate these benefits to specific clients.

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in

commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

We may engage in bunched trading, which is the purchase or sale of a security for the accounts of multiple clients in a single transaction. If a bunched trade is executed, each participating client receives a price that represents the average of the prices at which all of the transactions in a given bunch were executed. Executing a bunched trade allows transaction costs to be shared equally and on a pro rata basis among all of the participating clients. If the order is not completely filled, the securities purchased or sold are distributed among participating clients on a pro rata basis or in some other equitable manner.

Bunched trades are placed only when we reasonably believe that the combination of the transactions provides better prices for clients than had individual transactions been placed for clients. Transactions for nondiscretionary client accounts are not bunched with transactions for discretionary client accounts. Transactions for the accounts of our employees and advisory representatives may be included in bunched trades. They receive the same average price and pay the same commissions and other transaction costs, as clients. Transactions for the accounts of our advisory representatives or employees will not be favored over

transactions for client accounts.

We are not obligated to include any client account in a bunched trade. Bunched trades will not be affected for any client's account if doing so is prohibited or otherwise inconsistent with that client's investment advisory agreement. No client will be favored over any other client.

Review of Accounts

Investment Supervisory Services client assets and the Portfolio Consulting and Management Services client assets will be reviewed on an ongoing basis. Individual accounts are analyzed on at least a quarterly basis.

Advisory accounts participating in a third-party money management program are reviewed on a quarterly basis.

Financial planning clients will receive those reviews and reports for which they contract RH Advisory to prepare.

We will conduct client meetings at least annually. These reviews include an assessment of the program and the independent money managers utilized within the programs.

More frequent reviews may be triggered by such variables as market and economic conditions, political circumstances and your individual needs and goals.

All reviews will be performed by the

investment advisory representative responsible for the individual account.

You will receive statements from the custodian/broker-dealer at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values.

Client Referrals and Other Compensation

We receive certain economic benefits as a result of our participation in National Financial's institutional program. Those benefits are described in detail in the preceding section entitled "Brokerage Practices."

We may enter into referral arrangements with individuals, including CPAs, who are not employees or agents of RH Advisory. These arrangements are done in compliance with the rules and regulations of the Investment Advisors Act of 1940 and the terms of the arrangements are fully disclosed to the Client at the time the referral is made. Clients do not typically pay a higher fee as a result of such payment arrangements.

Custody

You will receive statements from the custodian/broker-dealer that holds your investment account on at least a quarterly basis. We urge you to carefully review these statements. You should verify that the transactions in your account are

consistent with your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer should you have any questions or concerns regarding your account.

Third Party Advisory Services

You will receive quarterly performance reports from the manager who you've selected to invest the assets in your account. We do not provide regular reports to clients who participate in these programs. You will receive a minimum of a quarterly statement from the third party money management program.

Investment Discretion

We offer our advisory services on a discretionary basis. This means that we do not need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts. We do not, however, have the ability to choose the broker-dealer through which transactions will be executed. Additionally, we do not have the ability to withdraw funds from your account (other than to withdraw our advisory fees which, may only be done with your prior written authorization.) This discretion is used in a manner consistent with the stated investment objectives for your account, if you have given us written authorization to do so. We only exercise discretion in accounts where we have been authorized by you. This authorization is typically included in

the investment advisory agreement you enter into with us.

Third Party Advisory Services

Typically in Third Party Advisory Services, the third party investment manager will exercise discretion in the management of client accounts. All securities transactions will be decided upon and executed by that manager. We will not manage or obtain discretionary authority over the assets in accounts participating in these programs. However, you may grant us the discretionary authority to hire and fire such third party managers.

Voting Client Securities

We do not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your accounts may be invested. In addition, we do not take any action or give any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits. We will, however, forward to you any information received by us regarding proxies and class action legal matters involving any securities held in your accounts.

Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.