



Jaffe Tilchin Institutional Consulting

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813.963.2500*

www.jaffetilchin.com

Disclosure Brochure Institutional Services

March 15, 2012

This brochure provides information about the qualifications and business practices of Jaffe Tilchin Institutional Consulting. If you have any questions about the contents of this brochure, please contact us at 813.963.2500. 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.

Jaffe Tilchin Institutional Consulting 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 Jaffe Tilchin Institutional Consulting 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 is prepared according to the SEC’s new requirements and rules. Jaffe Tilchin Institutional Consulting (“Jaffe Tilchin, we, us, our, ours”) will ensure 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, you may request our brochure by contacting Colleen Patterson, Operations Manager, at 813.963.2500 or Colleen@jaffetilchin.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. This website also provides information about any persons affiliated with Jaffe Tilchin who are registered as investment adviser representatives of Jaffe Tilchin. 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

Jaffe Tilchin Investment Partners is a Limited Liability Company organized under the laws of Florida. Scott Jaffe & Louis Tilchin founded the Tampa -based investment advisory firm in 2007 and are the principal owners.

Jaffe Tilchin Investment Partners is a member of the Jaffe Tilchin Wealth Management family of companies. Jaffe Tilchin Institutional Consulting is a separate operating division of Jaffe Tilchin Investment Partners. Jaffe Tilchin Investment Partners provides retail investment advisory services. Information about the advisory services offered by Jaffe Tilchin Investment Partners and the accompanying fees and charges can be found in the related Retail Services Disclosure Brochure.

General Institutional Consulting

We serve as investment consultant for 401(k) plans, 403(b) plans, Defined Contribution Plans, Defined Benefit Plans, Cash Management Accounts, Non-Qualified Deferred Comp Plans, Endowments and Foundations, providing the following services for benefit of participants and their beneficiaries:

- plan needs assessment,
- investment policy statement review or creation,
- recommendation of investment options,
- monitoring investment performance,
- periodic fee review,

- coordination of investment committee services,
- facilitation of provider selection, and
- plan design.

Needs and Restrictions

In managing your investment portfolio, we consider your:

- financial situation,
- risk tolerance,
- investment horizon,
- liquidity needs,
- tax considerations,
- investment objectives, and
- any other issues important to your state of affairs.

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

Assets under Management

As of December 31, 2011, we managed approximately \$301.6 million in client assets where we made all of the investment decisions.

Fees and Compensation

Our fee schedule is described below:

<u>Plan Asset Balance</u>	<u>Annual Fee¹</u>
Up to \$5,000,000	1.00%
\$5,000,001 to \$15,000,000	0.75%
\$15,000,001 to \$30,000,000	0.65%
\$30,000,001 to \$60,000,000	0.50%
\$60,000,001 to \$100,000,000	0.45%

¹Fees are negotiable at our sole discretion.

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

- custodial fees,
- brokerage commissions,
- transaction fees,
- SEC 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.

We do not participate in or benefit from these charges.

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.

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

All advisory fees are billed quarterly, in arrears as contractually agreed upon, and are based upon market value of the plan assets on the last business day of the preceding calendar quarter as determined by the plan custodian.

You may terminate your advisory agreement within thirty (30) business days from the date the agreement is executed, without penalty. After the first five business days, should any party terminate the agreement before the end of a billing period, any fees that we have earned are immediately due and payable.

Our investment adviser representatives are also registered representatives of Comprehensive Asset Management and Servicing, Inc. (“CAMAS”), a registered broker-dealer (member FINRA/SIPC). They are also licensed with various insurance companies. They may earn commissions if investment or insurance products are purchased through them in those capacities. This does not apply within the context of a consulting relationship.

Performance-Based Fees

We do not charge performance-based fees on our consulting client accounts. Performance-based fees are based on a share of the capital gains on or capital appreciation of the assets in the account.

Types of Clients

We offer consulting services to 401(k), 403(b), Defined Contribution Plans, Defined Benefit Plans, Cash Management Accounts, Non-Qualified Deferred Comp Plans, Endowments and Foundations. There are no conditions for starting and maintaining an advisory relationship.

Methods of Analysis, Investment Strategies and Risk of Loss

We use both quantitative and qualitative analysis when reviewing performance, managers, and plan assessments. This includes but is not limited to assessing a manager's investment philosophy, strength of the organization and its people, consistency of performance, and style purity of the product.

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 make recommendations in a manner consistent with your risk tolerances and stated objectives, we cannot guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

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

In addition to their position with Jaffe Tilchin, your advisory representative may also be a registered representative with Comprehensive Asset Management and Servicing, Inc. ("CAMAS"), a registered broker-dealer (member FINRA/SIPC). You are under no obligation to purchase or sell securities through your advisory representative in conjunction with their association with CAMAS. If you do so, however, they may earn compensation in the form of commissions or investment advisory fees.

Jaffe Tilchin Investment Partners, LLC is affiliated with Jaffe Tilchin Wealth Management, through common

ownership. Jaffe Tilchin Wealth Management is an insurance agency and offers commissionable insurance products. Your advisory representative may also be licensed as an insurance agent. You are similarly under no obligation to purchase insurance products through your advisory representative. If you do so, however, your advisory representative may receive commissions in addition to any fees you pay to us.

You are under no obligation to follow our recommendations.

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 are independently owned and operated and not affiliated with any custodian.

We may recommend that the custodian for your account be Fidelity Brokerage Services, LLC (“Fidelity”). Fidelity will assist us in servicing your accounts. Our use of Fidelity is, however, a beneficial business arrangement for us and for Fidelity. Information regarding the benefits of this relationship is described below. In recommending Fidelity as custodian and as the securities brokerage firm responsible for executing transactions for your portfolios, we consider at a minimum Fidelity’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 Fidelity to execute transactions for your accounts is not the lowest possible transaction cost, but whether Fidelity can

provide what is in our view the best qualitative execution for your account.

Fidelity 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 place a minimum volume of transactions or maintain a minimum dollar amount of client assets to receive these services.

Fidelity 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.

Fidelity also makes available to us 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.

Fidelity 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.

Fidelity may also make available or arrange for these types of services to be provided to us by independent third parties. Fidelity 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 Fidelity, 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 Fidelity 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 Fidelity 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

Fidelity. We do not attempt to allocate these benefits to specific clients.

In recommending a custodian, we will consider the size of your account and the practices of the custodian. Depending on asset size, bundled services offered by Fidelity may be more cost effective than using a separate custodian. We will review pricing options with you when recommending a custodian.

Review of Accounts

All client accounts are monitored on an ongoing basis with a formal review conducted at least annually or as agreed upon with individual clients. The reviews focus on the consistency of portfolio investments with each client's stated objectives and risk tolerances. The reviews also consider:

- investment restrictions requested by individual clients,
- investment time horizons,
- liquidity needs,
- tax considerations, and
- other circumstances unique to each client.

Account reviews may also be triggered by other factors such as changes in general economic and market conditions, analyst reports, issuer news and interest rate movement. Louis Tilchin, Managing Partner, and Scott Jaffe, Director of Investment Management, assign reviewers based upon their familiarity with your accounts. Typically, advisory

representatives review their own client accounts.

You will receive statements from the custodian at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values. You will also receive performance analysis reports prepared by us which describe the returns realized on the investments in your account.

Client Referrals and Other Compensation

We do not directly or indirectly compensate any person who is not one of our advisory representatives or employees for client referrals.

We may receive certain economic benefits as a result of Jaffe Tilchin Investment Partner's participation in Fidelity's institutional program. Those benefits are described in detail in the preceding section entitled "Brokerage Practices."

Custody

You will receive statements from the custodian that holds your investment account on at least a quarterly basis. We urge you to carefully review these statements and compare them to the account statements that we may provide you. 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.

Investment Discretion

We offer our consulting services on a nondiscretionary basis. We do not have the ability to effect trades in your investment accounts. We also do not have the ability to choose the broker-dealer through which transactions will be executed.

Voting Client Securities

We are expressly precluded from taking any action or rendering any advice to you with respect to the voting of proxies solicited by, or with respect to, the issuers of any securities. You expressly retain the authority and responsibility with respect to voting proxies for the Plan or will delegate discretion with respect to voting such proxies to a third-party.

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.

Louis Tilchin

Jaffe Tilchin Investment Partners, LLC.

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Brochure Supplement

March 15, 2012 This brochure supplement provides information about Louis Tilchin that supplements the Jaffe Tilchin Investment Partners, LLC brochure. You should have received a copy of that brochure. Please contact M. Scott Jones, Chief Compliance Officer, if you did not receive Jaffe Tilchin Investment Partners, LLC's brochure or if you have any questions about the contents of this supplement.

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

Educational Background and Business Experience



Louis Tilchin

Year of birth: 1964

Formal education:

- Florida State University; BS Degree - Business Administration

Business background:

- Jaffe Tilchin Investment Partners, LLC (also doing business as Jaffe Tilchin Institutional Consulting and Jaffe Tilchin Wealth Management) (04/2007 to Present), Managing Partner & Investment Adviser Representative
- Jaffe Tilchin Wealth Management, (04/2007 to Present), Owner
- Comprehensive Asset Management & Servicing, Inc. (04/2009 – Present), Registered Representative

- J.W. Cole Financial, Inc. (09/2003 – 04/2009), Registered Representative
- Jonathan Roberts Advisory Group (01/2002 to 12/2008), Investment Adviser Representative

Disciplinary Information

Louis Tilchin has not been the subject of any legal or disciplinary event.

Other Business Activities

Jaffe Tilchin Investment Partners, LLC is affiliated with Jaffe Tilchin Wealth Management, through common ownership. Jaffe Tilchin Wealth Management is an insurance agency and offers commissionable insurance products.

In addition to his association with Jaffe Tilchin, Mr. Tilchin is:

- a licensed insurance agent
- a Registered Representative

You are not required to do business with Mr. Tilchin in any of these capacities.

As a licensed insurance agent and registered representative of a broker-dealer, Mr. Tilchin may receive commissions or other compensation from the sale of insurance and securities products to you. (For example, Mr. Tilchin may receive “12b-1 fees,” which

are fees paid by mutual fund companies for the on-going marketing of their investment products). This additional compensation may present a conflict of interest because it creates an incentive to recommend certain investments over others that may not offer similar compensation.

Additional Compensation

Mr. Tilchin receives additional compensation for his activities as a registered representative of a broker-dealer and as an insurance agent. This compensation is described under “Other Business Activities” above. Mr. Tilchin receives no additional compensation beyond the consulting fees charged for consulting services provided to qualified and non-qualified plans.

Supervision

Mr. Tilchin is supervised by M. Scott Jones, Chief Compliance Officer. Mr. Jones can be reached at 813.963.2500.

We supervise Mr. Tilchin by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the

advice that Mr. Tilchin gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight to ensure that Mr. Tilchin is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.

Scott Jaffe

Jaffe Tilchin Investment Partners, LLC.

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Brochure Supplement

March 15, 2012

This brochure supplement provides information about Scott Jaffe that supplements the Jaffe Tilchin Investment Partners, LLC brochure. You should have received a copy of that brochure. Please contact M. Scott Jones, Chief Compliance Officer, if you did not receive Jaffe Tilchin Investment Partners, LLC's brochure or if you have any questions about the contents of this supplement.

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

Educational Background and Business Experience



Scott Jaffe

Year of birth: 1960

Formal education:

- Indiana University; BS Degree - Finance
- Penn State University; Master of Business Administration

Business background:

- Jaffe Tilchin Investment Partners, LLC (also doing business as Jaffe Tilchin Institutional Consulting and Jaffe Tilchin Wealth Management) (04/2007 to Present), Director of Investment Management & Investment Adviser Representative
- Jaffe Tilchin Wealth Management, (04/2007 to Present), Owner
- Comprehensive Asset Management & Servicing, Inc.

(04/2009 – Present), Registered Representative

- J.W. Cole Financial, Inc. (04/2007 – 04/2009), Registered Representative
- Citigroup Global Markets, Inc. (02/1997 – 05/2007), Registered Representative
- Salomon Smith Barney, Inc. (02/1997 to 04/2007), Senior Portfolio Manager

Disciplinary Information

Scott Jaffe has not been the subject of any legal or disciplinary event.

Other Business Activities

Jaffe Tilchin Investment Partners, LLC is affiliated with Jaffe Tilchin Wealth Management, through common ownership. Jaffe Tilchin Wealth Management is an insurance agency and offers commissionable insurance products.

In addition to his association with Jaffe Tilchin, Mr. Jaffe is:

- a licensed insurance agent
- Registered Representative

You are not required to do business with Mr. Jaffe in any of these capacities.

As a licensed insurance agent and registered representative of a broker-dealer, Mr. Jaffe may receive commissions or other compensation from the sale of insurance and securities products to you. (For example, Mr. Jaffe may receive “12b-1 fees,” which are fees paid by mutual fund companies for the on-going marketing of their investment products). This additional compensation may present a conflict of interest because it creates an incentive to recommend certain investments over others that may not offer similar compensation.

Additional Compensation

Mr. Jaffe receives additional compensation for his activities as a registered representative of a broker-dealer and as an insurance agent. This compensation is described under “Other Business Activities” above. Mr. Jaffe receives no additional compensation beyond the consulting fees charged for consulting services provided to qualified and non-qualified plans.

Supervision

Mr. Jaffe is supervised by M. Scott Jones, Chief Compliance Officer. Mr. Jones can be reached at 813.963.2500.

We supervise Mr. Jaffe by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Mr. Jaffe gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight to ensure that Mr. Jaffe is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.

M. Scott Jones, CLU

Jaffe Tilchin Investment Partners, LLC.

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Brochure Supplement

March 15, 2012

This brochure supplement provides information about M. Scott Jones, CLU that supplements the Jaffe Tilchin Investment Partners, LLC brochure. You should have received a copy of that brochure. Please contact M. Scott Jones, Chief Compliance Officer, if you did not receive Jaffe Tilchin Investment Partners, LLC's brochure or if you have any questions about the contents of this supplement.

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

Educational Background and Business Experience



M. Scott Jones, CLU

Year of birth: 1960

Formal education:

- Florida State University; BS Degree – Risk Management & Insurance

Business background:

- Jaffe Tilchin Investment Partners, LLC (also doing business as Jaffe Tilchin Institutional Consulting and Jaffe Tilchin Wealth Management) (04/2007 to Present), Chief Compliance Officer & Investment Adviser Representative
- Comprehensive Asset Management & Servicing, Inc. (04/2009 – Present), Registered Representative
- J.W. Cole Financial, Inc. (09/2003 – 04/2009), Registered Representative

- Jonathan Roberts Advisory Group; (01/02 to 04/07), Investment Advisor Representative

Professional Designations:

The Chartered Life Underwriter® (CLU) designation is a professional credential for persons providing advisory services related to risk management.

The CLU® designation is awarded by The American College after successful completion of eight college-level courses, generally requiring 400 hours of study and examinations for each course.

Designees must meet experience and continuing education requirements and must adhere to a high ethical standard.

Disciplinary Information

M. Scott Jones has not been the subject of any legal or disciplinary event.

Other Business Activities

In addition to his association with Jaffe Tilchin, Mr. Jones is:

- a licensed insurance agent
- a Registered Representative

You are not required to do business with Mr. Jones in any of these capacities.

As a licensed insurance agent and registered representative of a broker-

dealer, Mr. Jones may receive commissions or other compensation from the sale of insurance and securities products to you. (For example, Mr. Jones may receive “12b-1 fees,” which are fees paid by mutual fund companies for the on-going marketing of their investment products). This additional compensation may present a conflict of interest because it creates an incentive to recommend certain investments over others that may not offer similar compensation.

Additional Compensation

Mr. Jones receives additional compensation for his activities as a registered representative of a broker-dealer and as an insurance agent. This compensation is described under “Other Business Activities” above. Mr. Jones receives no additional compensation beyond the consulting fees charged for consulting services provided to qualified and non-qualified plans.

Supervision

Mr. Jones is supervised by Louis Tilchin, Managing Partner. Mr. Tilchin can be reached at 813.963.2500.

We supervise Mr. Jones by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Mr. Jones gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight to ensure that Mr. Jones is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.

Michael DeGenova, CRPS®

Jaffe Tilchin Investment Partners, LLC.

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Brochure Supplement

March 15, 2012

This brochure supplement provides information about Michael DeGenova that supplements the Jaffe Tilchin Investment Partners, LLC brochure. You should have received a copy of that brochure. Please contact M. Scott Jones, Chief Compliance Officer, if you did not receive Jaffe Tilchin Investment Partners, LLC's brochure or if you have any questions about the contents of this supplement.

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

Educational Background and Business Experience



Michael DeGenova, CRPS®

Year of birth: 1976

Formal education:

- University of Tampa; BS 1998

Business background:

- Jaffe Tilchin Institutional Consulting; (02/2012 – Present), Director of Institutional Consulting
- Jaffe Tilchin Investment Partners, LLC (also doing business as Jaffe Tilchin Institutional Consulting and Jaffe Tilchin Wealth Management) (05/10 to Present), Investment Adviser Representative
- Comprehensive Asset Management & Servicing, Inc. (05/10 – Present), Registered Representative

- Smith Barney; (10/00 to (05/10), Financial Advisor

Professional Designations:

Chartered Retirement Plans SpecialistSM or CRPS®

Individuals who hold the CRPS® designation have completed a course of study encompassing design, installation, maintenance and administration of retirement plans. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.

Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Disciplinary Information

Michael DeGenova has not been the subject of any legal or disciplinary event.

Other Business Activities

In addition to his association with Jaffe Tilchin, Mr. DeGenova is:

- a licensed insurance agent
- a Registered Representative

You are not required to do business with Mr. DeGenova in any of these capacities.

As a registered representative of a broker-dealer and as an insurance agent, Mr. DeGenova may receive commissions or other compensation from the sale of securities and insurance products to you. (For example, Mr. DeGenova may receive “12b-1 fees,” which are fees paid by mutual fund companies for the on-going marketing of their investment products). This additional compensation may present a conflict of interest because it creates an incentive to recommend certain investments over others that may not offer similar compensation.

Additional Compensation

Mr. DeGenova receives additional compensation for his activities as a registered representative of a broker-dealer. This compensation is described under “Other Business Activities” above. Mr. DeGenova receives no additional compensation beyond the consulting fees charged for consulting

services provided to qualified and non-qualified plans.

Supervision

Mr. DeGenova is supervised by M. Scott Jones, Chief Compliance Officer. Mr. Jones can be reached at 813.963.2500.

We supervise Mr. DeGenova by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Mr. DeGenova gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight to ensure that Mr. DeGenova is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.