

Rookwood Wealth Management, LLC



Firm Brochure

(Part 2A of Form ADV)

Dated 3/31/2011

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This brochure provides information about the qualifications and business practices of Rookwood Wealth Management, LLC ("Rookwood"). If you have any questions about the contents of this brochure, please contact us at (513) 871-7813 or by email at Eva@Rookwood.biz. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

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

References herein to Rookwood as a "Registered Investment Adviser" or any reference to being "registered" does not imply a certain level of skill or training.

Item 2 Material Changes

The SEC issued a final rule in July, 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization. As such we have revised our ADV Part 2 form to reflect this new rule. There have been no material changes made to Rookwood’s disclosure statement since our last Annual Amendment filing on March 31, 2010. Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (513) 871-7813 or by email at: Eva@Rookwood.biz.

Item 3 Table of Contents

Item 1 Cover Page.....	1
Item 2 Material Changes.....	2
Item 3 Table of Contents.....	2
Item 4 Advisory Business.....	3
Item 5 Fees and Compensation.....	6
Item 6 Performance-Based Fees	7
Item 7 Types of Clients.....	7
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.....	7
Item 9 Disciplinary Information	9
Item 10 Other Financial Industry Activities and Affiliations	9
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
Item 12 Brokerage Practices.....	10
Item 13 Review of Accounts.....	12
Item 14 Client Referrals and Other Compensation.....	13
Item 15 Custody.....	13
Item 16 Investment Discretion.....	13
Item 17 Voting Client Securities.....	14
Item 18 Financial Information.....	14
Brochure Supplement.....	15
Education and Business Standards	16
Supervision	16
Additional Compensation.....	16
Professional Certifications.....	17
Eva Gilkey Booher, CFA.....	19

Item 4 Advisory Business

Firm Description and Principal Owners

Eva Gilkey Booher, CFA founded Rookwood as a State of Ohio limited liability company in April, 2007. Rookwood is registered with the SEC as a Registered Investment Adviser. The Mark S. Booher and Eva C. Booher Trust is the principal owner of Rookwood Wealth Management, LLC.

Rookwood provides wealth management services to its clients. Wealth management includes investment management, personal financial planning, and consulting services to individuals, families and their related entities, trusts and estates, and family businesses. In conjunction with this, Rookwood may also serve business entities, pension and profit sharing plans and charitable organizations. Rookwood works with clients to define financial objectives, and to develop and implement investment strategies to reach those objectives.

Rookwood is compensated solely from fees paid directly by clients. The firm does not receive commissions based on the client's purchase of any financial product. No commissions in any form are accepted. No referral fees are paid or accepted. No benefits are received from account custodians based on client securities transactions ("soft dollar benefits").

Assets under the direct management of Rookwood are held by independent custodians, including Charles Schwab and Co., Inc. ("Schwab") and others, in the client's name. Rookwood does not act as a custodian of client assets.

At the request of its clients, Rookwood may recommend other professionals (e.g. lawyers, accountants, insurance agents, real estate agents, etc.). All such other professionals are engaged directly by the client on an as-needed basis. Rookwood does not accept any referral fees or other compensation related to such referrals, and Rookwood represents that there are no conflicts of interest in this process. However, should any conflict of interest ever arise it will be disclosed to the client and managed in the best interest of the client.

Types of Advisory Services

Wealth Management Services: The primary type of service offered by Rookwood is wealth management. Wealth management is the combination of investment management, financial planning, and consulting services. Not every client makes use of all of Rookwood's services, as some are not requested or are being provided by other professionals.

In performing its services, Rookwood is not required to verify any information received from the client or from the client's other professionals. Each client is advised that it remains his/her/its responsibility to promptly notify Rookwood when there is any change in his/her/its financial situation and/or financial objectives for the purpose of reviewing, evaluating, or revising Rookwood's previous recommendations and/or services.

Limited Consulting/Implementation Services: To the extent specifically requested by the client, Rookwood may provide very limited consultation services to its clients on investment and non-investment related matters, such as estate planning, tax planning, insurance, etc. Rookwood does not receive any separate or additional fee for any such consultation services unless mutually agreed to prior to providing such services. Neither Rookwood, nor any of its representatives, serves as an attorney, accountant, or licensed insurance agent, and no portion of Rookwood's services should be construed as such. To the extent requested by a client, Rookwood may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance agent, etc.). A client is under no obligation to engage the services of any such recommended professional. Please Note: If a client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

Non-Discretionary Service Limitations: Clients that engage Rookwood on a non-discretionary investment advisory basis must be willing to accept that Rookwood cannot effect any account transactions without obtaining prior consent in a form acceptable to Rookwood in its sole discretion to any such transaction(s) from the client. Thus, in the event of a market correction during which the client is unavailable, Rookwood will be unable to effect any account transactions (as it would for its discretionary clients) without first obtaining the client's consent.

Client Obligations: In performing its services, Rookwood shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely upon the information so provided. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify Rookwood if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Rookwood's previous recommendations and/or services.

Disclosure Statement: A copy of Rookwood's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or at the same time as, the execution of the Investment Advisory Agreement.

Customized Services: Rookwood shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, Rookwood shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at anytime, impose reasonable restrictions, in writing, and signed by Rookwood, on Rookwood's services.

Wrap Fee Program: Rookwood does not participate in a wrap fee program by providing portfolio management services. Under a typical wrap-fee program, a client will pay the sponsor a single fee for management, brokerage, custody and other services provided under the program.

Item 5 Fees and Compensation

The client can determine to engage Rookwood to provide discretionary and/or nondiscretionary investment advisory services on a fee-only basis. Rookwood's annual investment advisory fee is based upon a percentage (%) of the market value of the assets placed under Rookwood's management depending upon the market value of assets under management as follows:

Assets Under Management	Annual Fee*
Up to \$2,000,000	1.00%
On the next \$1,000,000	0.90%
Next \$2,000,000	0.80%
All amounts over \$5,000,000	0.50%
* Minimum annual fee \$10,000	

Rookwood's annual investment advisory fee shall include wealth management services, and, to the extent specifically requested by the client, some consulting services. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of Rookwood), Rookwood may charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client and mutually agreed to prior to the services being rendered.

Rookwood clients have their advisory fees deducted from their custodial account. Both Rookwood's Investment Advisory Agreement and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of Rookwood's investment advisory fee and to directly remit that management fee to Rookwood in compliance with regulatory procedures. In the limited event that Rookwood bills the client directly, payment is due upon receipt of Rookwood's invoice. Rookwood shall deduct fees and/or bill clients quarterly in advance, based upon the market value of the assets on the last business day of the previous three months.

As discussed below, unless the client directs otherwise or an individual client's circumstances require, Rookwood typically recommends that Schwab serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as Schwab charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition to Rookwood's investment management fee, custodian brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

The Investment Advisory Agreement between Rookwood and the client will continue in effect until terminated by either party upon written notice in accordance with the terms of the Investment Advisory Agreement which shall be effective at the end of the then said quarter. Termination shall not affect or preclude the consummation of any transactions initiated prior thereto. Neither Rookwood, nor its representatives accept compensation from the sale of securities or other investment products, or referral fees from other professional advisors.

Item 6 Performance-Based Fees

Neither Rookwood nor any supervised person of Rookwood accepts performance-based fees. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client. However, the nature of asset-based fees allows Rookwood to participate in the growth of the client's wealth. This also means that our fees typically decline when the client's portfolio declines in value.

Item 7 Types of Clients

Rookwood provides wealth management services to individuals, families and their related entities, trusts and estates, and family businesses. In conjunction with this, Rookwood may also serve business entities, pension and profit sharing plans and charitable organizations. Client relationships vary in scope and length of service. Rookwood generally requires an annual minimum fee of \$10,000. Rookwood, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its annual minimum fee requirement based upon certain criteria (e.g. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

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

Investment Analysis. Rookwood employs mutual funds within portfolios. These mutual funds employ their own methodology of security analysis. Rookwood monitors these mutual funds on an ongoing basis. Security analysis methods at Rookwood include fundamental security analysis. Fundamental analysis examines a security's historical and present data. For individual securities, it involves analyzing their financial statements, management, competitive advantages, competitors and markets.

Investment Strategies. The primary investment strategy Rookwood uses for client accounts is strategic asset allocation. Investment Policy Statements are developed for each client detailing the asset allocation recommended for the client. Rookwood may use various individual equity (stocks), fixed income (bonds), and other fixed income securities, mutual funds, exchange traded funds ("ETFs"), closed-end funds, on a discretionary and non-discretionary basis in accordance with the client's designated investment objective(s).

The investment strategy for a specific client is based upon the objectives, income needs, and tax situation stated by the client during consultations. The client may change these objectives at any time. The client's goals and objectives are gathered and discussed during meetings and via correspondence with the client. Each client portfolio is constructed solely for that client and may or may not be constructed similarly to that of any other client.

Portfolios are generally globally diversified to increase the opportunity to manage the risk associated with investing. Some portfolios may be constructed to suit a particular need and therefore may be less diversified. Additionally, some portfolios may hold large positions predating Rookwood's management and/or unique to the client. Rookwood may utilize the following investment strategies when implementing investment advice given to clients:

Long Term Investments (securities held at least a year) – the intent of most of the securities Rookwood purchases. Short Term Investments (securities sold within a year) – sometimes are the result of some investment strategies Rookwood pursues. Securities sold within a year are caused by actions taken by Rookwood (e.g. objectives met, tax loss harvesting, moving to another more attractively priced security, etc.), or actions taken by others (e.g. mergers and exchanges, instructions from the client, etc.). Margin Transactions (use of borrowed assets to purchase securities) – only used if so instructed by the client or to bridge a purchase or sale transaction(s). Options (contract for the purchase or sale of a security at a predetermined price for a specific period of time) – options and option strategies are rarely used, and only if so approved by the client.

The use of options transactions as an investment strategy may involve a higher level of inherent risk. Option transactions establish a contract between two parties concerning the buying or selling of an asset at a predetermined price during a specific period of time. During the term of the option contract, the buyer of the option gains the right to demand fulfillment by the seller. Fulfillment may take the form of either selling or purchasing a security depending upon the nature of the option contract. Generally, the purchase or the recommendation to purchase an option contract by Rookwood shall be with the intent of offsetting/”hedging” a potential market risk in a client’s portfolio. Please Note: Although the intent of the options-related transactions that may be implemented by Rookwood is to hedge against principal risk, certain of the options-related strategies (e.g. short positions, etc.), may, in and of themselves, produce principal volatility and/or risk. Thus, a client must be willing to accept the increased volatility and principal risks associated with such strategies. Accordingly, the decision as to whether to employ option strategies is left totally to the discretion of client.

Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Rookwood) will be profitable or equal any specific past or expected performance level(s).

Rookwood’s methods of analysis and investment strategies do not present any additional significant or unusual risks when compared to other portfolio managers. However, every method of analysis has its own inherent risks. To perform an accurate market analysis Rookwood must have access to current/new market information. Rookwood has no control over the dissemination rate of market information; therefore, unbeknownst to Rookwood, certain analyses may be compiled with outdated market information, severely restricting the value of Rookwood’s analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Rookwood’s primary investment strategy (i.e. Long Term Purchases) requires a longer investment time period to allow for the strategy to develop. Shorter term investment strategies (i.e. Short Term Purchases) require a shorter investment time period to develop but, as a result of more frequent trading, may incur higher transactional costs and adverse tax consequences when compared to a longer term investment strategy. Every investment strategy has its own inherent risks and limitations.

In addition to the investment strategies discussed above, Rookwood may also implement and/or recommend -use of margin, and/or options transactions. Each of these strategies generally has a higher level of inherent risk. Accordingly, the decision as to whether to employ option strategies is left totally to the discretion of client.

Item 9 Disciplinary Information

Rookwood and its employees have not been involved in any legal or disciplinary events related to past or present investment management activities.

Item 10 Other Financial Industry Activities and Affiliations

- A. Neither Rookwood, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither Rookwood, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. Rookwood has no other relationship or arrangement with a related person that is material to its advisory business.
- D. Rookwood does not receive, directly or indirectly, compensation from other investment advisors that it may recommend or select for its clients.

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

- A. Rookwood maintains an investment policy relative to personal securities transactions. This investment policy is part of Rookwood's overall Code of Ethics, which serves to establish a standard of business conduct for all of Rookwood's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisors Act of 1940, Rookwood also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Rookwood or any person associated with Rookwood.

- B. Neither Rookwood nor any related person of Rookwood recommends, buys, or sells for client accounts, securities in which Rookwood or any related person of Rookwood has a material financial interest.
- C. Rookwood encourages its representatives to invest in the same securities it recommends for its clients. Rookwood and/or representatives of Rookwood may buy or sell securities that it also recommends to clients. This practice could create a situation where Rookwood and/or representatives of Rookwood are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation could create a potential conflict of interest. Although unlikely, practices such as "scalping" (i.e. a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if Rookwood did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front running" (i.e. personal trades executed prior to those of Rookwood's clients) and other potentially abusive practices.

Rookwood has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Rookwood's Access Persons (i.e. representatives who are involved in managing and trading in client accounts). Rookwood's securities transaction policy requires that an Access Person of Rookwood must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date Rookwood selects.

D. Rookwood and/or representatives may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Rookwood and/or representatives could potentially benefit from the sale or purchase of those securities. Therefore, this situation could create a conflict of interest. As indicated above in Item 11 C, Rookwood has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Rookwood's Access Persons.

Item 12 Brokerage Practices

- A. In the event that the client requests that Rookwood recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Rookwood to use a specific broker-dealer/custodian), Rookwood generally recommends that investment management accounts be maintained at Schwab. Prior to engaging Rookwood to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with Rookwood setting forth the terms and conditions under which Rookwood shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.
- B. Factors that Rookwood considers in recommending Schwab (or any other broker-dealer/custodian to clients) include historical relationship with Rookwood, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Rookwood's clients shall comply with Rookwood's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Rookwood determines, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Rookwood will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Rookwood's investment management fee. Rookwood's best execution responsibility is fulfilled if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.
1. Research and Additional Benefits: Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Rookwood may receive from Schwab (or another broker-dealer/custodian) without cost (and/or at a discount) support services and/or products, certain of which assist Rookwood to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Rookwood may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Rookwood in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that may be received may assist Rookwood in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Rookwood to manage and further develop its business enterprise. Rookwood's clients do not pay more for investment transactions effected and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by Rookwood to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

2. Rookwood does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Rookwood will not seek better execution services or prices from other broker-dealers or be able to “batch” the client's transactions for execution through other broker-dealers with orders for other accounts managed by Rookwood. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.
3. Rookwood does not receive referrals from broker-dealers.

Please Note: In the event that the client directs Rookwood to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative brokerage arrangements that may be available through Rookwood.

B. To the extent that Rookwood provides investment management services to its clients, the transactions for each client account generally will be effected independently. In the future, Rookwood may (but is not obligated to) combine or “bunch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Rookwood’s clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Rookwood shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 Review of Accounts

A. For those clients to whom Rookwood provides investment supervisory services, account reviews are conducted on an ongoing basis by Rookwood's Principals and/or representatives. All investment supervisory clients are advised that it remains their responsibility to advise Rookwood of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with Rookwood on at least an annual basis.

B. Rookwood may conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections, cash flows into and out of an account, and client request.

C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written or electronic summary account statements directly from the broker-dealer/custodian for the client accounts. Rookwood may also provide a written and/or electronic periodic report summarizing investment results.

Item 14 Client Referrals and Other Compensation

A. As referenced in Item 12.A.1 above, Rookwood may receive an indirect economic benefit from Schwab. Rookwood, without cost (and/or at a discount), may receive support services and/or products from Schwab.

Rookwood's clients do not pay more for investment transactions effected and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by Rookwood to Schwab or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

B. Rookwood typically receives client referrals as part of its business. The referrals have come from current clients, accountants, attorneys, other business professionals, employees, personal friends of employees and other sources. Rookwood does not compensate, directly or indirectly, any person, other than its representatives, for client referrals.

Item 15 Custody

Rookwood shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian for the client accounts. Rookwood may also provide a written periodic report summarizing account activity and performance.

Please Note: To the extent that Rookwood provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Rookwood with the account statements received from the account custodian. The account custodian does not verify the accuracy of Rookwood's advisory fee calculation.

Item 16 Investment Discretion

The client can determine to engage Rookwood to provide investment advisory services on a discretionary basis. Prior to Rookwood assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming Rookwood as the client's limited power of attorney and agent in fact, granting Rookwood full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account. Rookwood's authority to withdraw funds on its own authority is limited to its management fee.

Clients who engage Rookwood on a discretionary basis may, at anytime, impose restrictions, in writing and signed by Rookwood, on Rookwood's discretionary authority (e.g. limit the types/amounts of particular securities purchased for their account, limit or proscribe Rookwood's use of margin or option strategies, etc.).

Item 17 Voting Client Securities

Unless the client directs otherwise in writing, Rookwood is responsible for voting client proxies. However, the client shall maintain exclusive responsibility for all legal proceedings or other type events pertaining to the account assets, including, but not limited to, class action lawsuits. Rookwood shall vote proxies in accordance with its Proxy Voting Policy, a copy of which is available upon request. Rookwood shall monitor corporate actions of individual issuers and investment companies consistent with Rookwood's fiduciary duty to vote proxies in the best interests of its clients. Although the factors which Rookwood will consider when determining how it will vote differ on a case by case basis, they may, but are not be limited to, include the following: a review of recommendations from issuer management, shareholder proposals, cost effects of such proposals, effect on employees and executive and director compensation. With respect to individual issuers, Rookwood may be solicited to vote on matters including corporate governance, adoption or amendments to compensation plans (including stock options), and matters involving social issues and corporate responsibility. With respect to investment companies (i.e. mutual funds), Rookwood may be solicited to vote on matters including the approval of advisory contracts, distribution plans, and mergers. Rookwood shall maintain records pertaining to proxy voting as required pursuant to Rule 204-2 (c)(2) under the Advisers Act. Copies of Rules 206(4)-6 and 204-2(c)(2) are available upon written request. In addition, information pertaining to how Rookwood voted on any specific proxy issue is also available upon written request. Requests should be made by contacting Rookwood's Chief Compliance Officer, Eva Gilkey Booher.

Item 18 Financial Information

- A. Rookwood does not solicit fees from clients in advance of rendering services.
- B. Rookwood is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. Rookwood has never been the subject of a bankruptcy petition.

ANY QUESTIONS: Rookwood's Chief Compliance Officer, Eva Gilkey Booher, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.

Brochure Supplement

(Part 2B of Form ADV)

Dated 3/31/2011

Contact: Eva Gilkey Booher, CFA,
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This brochure supplement provides information about Eva Gilkey Booher, CFA that supplements the Rookwood Wealth Management (“Rookwood”) Brochure (Part 2A of Form ADV). You should have received a copy of Rookwood’s Brochure (Part 2A of Form ADV). Please contact Eva Gilkey Booher, Chief Compliance Officer at (513) 871-7813 or by email at Eva@Rookwood.biz if you did not receive Rookwood’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Rookwood’s Supervised Persons is available on the SEC’s website at www.adviserinfo.sec.gov.

Education and Business Standards

Rookwood requires that any employee whose function involves determining or giving investment advice to clients must be a graduate of a four year college and must:

1. Hold one of the following designations: Certified Financial Planner™ (CFP®) or Chartered Financial Analyst (CFA), or
 - Have at least 10 years' experience in investments, financial planning, accounting, or insurance, or
 - Have at least three years' experience in investments, financial planning, accounting, or insurance, and be pursuing one of the following designations: Certified Financial Planner™ (CFP®) or Chartered Financial Analyst (CFA);
2. Be properly licensed for all advisory activities in which they are engaged.

Supervision

All Supervised Person's (i.e. Rookwood's professional team) listed on the front page of this Brochure Supplement provide advice to clients and are monitored by Rookwood's Chief Compliance Officer, Eva Gilkey Booher.

Additional Compensation

Rookwood does not have additional compensation.

Professional Certifications

Rookwood's Supervised Persons have earned certifications and credentials that are required to be explained in further detail:

Chartered Financial Analyst (CFA)

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charter holders working in 135 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.



High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Certified Financial Planner™

Certified Financial Planner™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification.



To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks: **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and **Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Eva C. Gilkey Booher, Founder and President

Education Background:

- Year of Birth: 1959
- *Miami University*, Oxford, Ohio (1987, BS in Finance)
- *Chartered Financial Analyst* (CFA) (1990)

Business Background:

A Chartered Financial Analyst (CFA), Eva has over 24 years of experience in providing wealth management advice. Eva's business background includes the following:

- *Rookwood Wealth Management, LLC*, Founder and President (2007 – Present)
- *Bartlett and Co.*, Managing Director and Senior Portfolio Manager (1991-2001)
- *Renaissance Investment Co.*, Portfolio Manager (1990-1991)
- *Third National Bank, Nashville, Tennessee*, Trust Investment Officer (1987-1990)
- *Johnson Investment Counsel, Inc.*, Assistant Portfolio Manager (1987)

Disciplinary Information: None

Other Business Activities: None

Other Professional Activities: Eva is a member of the CFA Institute.