

Part 2A of Form ADV: *Firm Brochure*

Retirement Money Management of Sarasota

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This brochure provides information about the qualifications and business practices of Retirement Money Management. If you have any questions about the contents of this brochure, please contact us at 941-955-2099 or SStern@leenlee.com. 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.

Additional information about Retirement Money Management also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 145149.

Item 2 Material Changes

The SEC adopted "Amendments to Form ADV" in July, 2010. This Firm Brochure, dated 02/24/2011, is our new disclosure document prepared according to the SEC's new requirements and rules. As you will see, this document is a narrative that is substantially different in form and content, and includes some new information that we were not previously required to disclose.

After our initial filing of this Brochure, this Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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Item 4 Advisory Business

Retirement Money Management is a SEC-registered investment adviser with its principal place of business located in FL. Successful Money Management of Tampa Bay dba Retirement Money Management began conducting business in 1986 when it was formed by Richard and Robert Lee as equal partners. When Bob's father Richard retired in 2007, Successful Money Management of Sarasota dba Retirement Money Management (RMM) was formed.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company). Robert L. Lee is the 100% principal shareholder in Retirement Money Management ("RMM").

Retirement Money Management offers the following advisory services to our clients:

GENERAL DESCRIPTION OF SERVICES

Retirement Money Management (RMM) offers the following advisory services to our clients:

Our firm provides Non-discretionary investment management services to its Clients by offering a variety of asset classes and investment vehicles that typically include mutual funds, exchange traded funds ("ETFs"), and fixed income securities. RMM may recommend the services of outside investment advisers on a case-by-case basis, to pursue a particular asset class or investment strategy. The main factors that go into such a recommendation decision are the total cost to the client going directly to the advisor verses hiring the advisor as part of RMM's advisory program and any loss in outside advisory services when selecting one method over the other.

RMM's expectation of client in non-discretionary relationship.

Non-discretionary Services

Because clients do not grant our firm discretionary authority to automatically implement and update the securities associated with the agreed upon investment strategy (unless otherwise directed in writing), they acknowledge that it is their responsibility to make themselves available in person or by phone to go over the initial recommendations associated with the program they selected to approve those trades that they feel comfortable with. They also agree to make themselves available at least annually or more often if agreed on in writing to approve updates to the portfolio dictated by the client or the selected program. It is RMM's policy to make an appointment associated with the next evaluation period at the end of the previous evaluation. If this appointment is not set or it is cancelled for whatever reason by either party, it is the client's responsibility to make sure that a new appointment is set in a reasonable period of time.

Risk and Tax Disclosure

All investments involve risks (the amount of which may vary significantly). Investment performance can never be predicted or guaranteed, and the value of a Client account or portfolio holding will fluctuate due to market conditions and other factors. To implement investment advice, when a client opens an account by transferring securities to RMM instead of opening an account with cash and agrees upon RMM's receipt of said securities, that the account may be liquidated, all or a portion of the client's securities may be sold either at the initiation of or during the course of management of their account. RMM is not responsible for market risk that may result in losses to the Client's account during the in-kind transfer of securities from one institution to another. The Client is responsible for all the tax liabilities arising from such transactions and is encouraged to seek the advice of a qualified tax professional. Our firm, its affiliates and associated persons do not provide tax or legal advice for services it provides to Clients.

Advice and Comprehensive Financial Planning

Separate from its investment management as described above, Our firm provides advice services as described below. For clients seeking advice and comprehensive financial planning services involving analysis of their financial situation, Our firm provides services designed for a Client's specific financial objectives and goals.

RMM'S advice and comprehensive financial planning services generally include:

- Client profile and financial goal development
- Written financial plans, comprehensive to modular
- Asset allocation recommendations
- Investment policy statements
- Investment implementation proposals
- Consolidated financial summaries
- Advice implementation, including securities, brokerage, and non-brokerage transactions

Modular planning may include one or more of the following:

- Cash flow management
- Investment management
- Retirement planning
- Insurance needs analysis
- Education planning
- Estate planning

Certain clients that are small businesses may require special needs analyses, planning, or business performance reviews or other services.

Clients may choose to receive annual ongoing financial planning services for any modular or comprehensive service.

Although RMM generally recommends long-term investment strategies, it may recommend various short-term investment strategies to accommodate certain objectives.

RMM performs advice and financial planning services for clients with varying needs and circumstances which may differ from or be in contradiction with advice it may follow in the management of its own accounts.

Certain related persons of Our firm may perform securities transactions through a broker dealer on a client's behalf if requested to do so by the client for which the related person may receive a commission. Clients are under no obligation to effect securities transactions through a representative of our firm.

Advice Team-Advanced Research and Services; Fee Minimums and Fee Ranges

All clients engaging RMM for financial planning services receive thorough analyses and comprehensive evaluations and plans. For clients, desiring more tailored planning or more complex estate or financial planning needs, our firm will work with the client's attorneys and/or CPA's to provide additional planning services through a team approach to provide any additional research necessary for more complex client case work. The team evaluates those special needs and circumstances prior to making additional recommendations to clients. Specialty planning may involve more complex case work, additional charges to the client and may differ from the comprehensive planning pricing shown in the fee section below.

Client Information

For financial planning and advice implementation, our firm may use the following information sources about the client. Personal meetings, questionnaires, and/or documents or information supplied by the client or the client's advisor (i.e., attorneys, CPAs, bankers, power of attorney, etc.).

To provide appropriate investment recommendations for the Client, accurate and complete information is required. Our firm will notify or contact each Client annually at a minimum to determine whether there has been any change in Client's financial situation, investment objectives, investment needs, and also encourage the Client through personal meetings and client gatherings to contact our firm immediately with any information that the Client believes would have an impact on their current plan.

Investment Implementation Options

Should a Client choose to implement the recommendations made by RMM, the Client is advised to also work closely with his or her attorney, accountant, insurance agent, and/or securities broker if our firm is not already doing so. Our firm will make recommendations with respect to products and securities offered by NFS National Financial Services ("NFS") (a Fidelity investment company). The client has no obligation to implement any such recommendations with NFS or its affiliates.

Services provided by NFS would be separate and distinct, and any fees for NFS services would be separate from and in addition to any other fees paid to RMM.

Item 5 Fees and Compensation

GENERAL INFORMATION

Advice and Financial Planning Fees

Each Client will enter into an Advice and Financial Planning Agreement ("the agreement") which describes RMM services and fees. Our firm's financial planning fees are based on a flat rate or hourly rate or as a percentage of Client's investable assets or net worth, are negotiated between RMM and the Client, are subject to certain minimums, and are payable either in advance or in arrears. Fees are generally based upon specific event-driven needs or more comprehensive financial planning, taking into consideration a number of criteria, including investable assets, net worth, case complexity, services provided, and assets subject to the Agreement. Fees may be charged as a one-time financial planning fee or Client may select an annual on-going service for which the fee rate remains the same until the Client terminates the Advice and Financial Planning Agreement. The following chart provides the general range of fees for each Segment. The fees actually negotiated between and agreed upon by the client and RMM may differ from this chart.

ANNUAL BASELINE FEE SCHEDULE ADVICE ONLY

\$50,000 TO \$2,000,000 75 BASIS POINTS (BPS) MINIMUM \$750

\$2,000,001 TO \$3,000,000 50 BPS

\$3,000,001 TO \$4,000,000 40 BPS

GREATER THAN \$4,000,000 Negotiable

Because our firm may acquire Clients through acquisitions of unaffiliated investment firms, clients may be subject to different fee schedules of varying minimum fee requirements.

Fee Payments

Clients may pay by check, credit card, or provide our firm with written authorization to debit an investment account on the client's behalf.

Within five (5) business days (longer if mandated by law) from the execution of this Agreement, a Client may terminate without penalty or cost. Thereafter, collected but unearned fees may be refunded on a pro rata basis, and, under certain circumstances, the refund may be negotiated between the client and our firm. Among other factors, the amount of the refund may depend on the amount of work that has already been completed or the amount of time elapsed since Client executed the Agreement.

The fee for comprehensive financial planning starts at \$750 and can be significantly higher depending on the complexity and scope of the plan. Fifty percent of the fee is due in advance, and the remainder is due upon delivery of the plan to the client. Fees are negotiable. When promised deliverables are provided, a delivery of services form (DOS) will be issued to the Client. Fees may be charged as a one-time advice fee or Clients may select an annual on-going service for which the fee rate remains the same until the Client and adviser mutually agree to change the fee. For Advice and Financial Planning, there is a minimum fee of \$750 with a minimum asset amount of \$50,000 of the total investable assets under advisory. Any exceptions must be approved by an authorized officer or agent of RMM.

Specialty Planning is available at a rate to be negotiated by the Investment Advisory Representative. The Specialty Planning services can include advice on advanced planning issues such as: 1) Estate Planning; 2) Executive Compensation; 3) Stock Options; 4) Pension Plan Options; 5) Insurance Analysis; 6) Income Tax Strategies; or other specialty issues as needed and appropriate for the individual client. Client deliverables such as written financial plans or recommendations for implementation of advice will be completed within six (6) months from the date of the Client's execution of the Agreement. Clients will execute a Delivery of Services letter upon receipt of financial plans or advice recommendations as stipulated in the Client Agreement. Any exceptions must be approved by an authorized officer or agent of RMM. Even though payment for client deliverables, such as written financial plans or annual updates to written plans along with their recommendation for implementation are due upon completion and acceptance by the client of the finished document, execution of the advice could take as long as six (6) months from the date that the Client executed the Agreement.

Mutual Fund Selection and Monitoring Services

Services under this program are provided on an active basis of accounts with a minimum size of \$25,000. Our firm will determine which investment allocations are suitable to the client based upon the client's desired return and risk tolerance. The fee structure payable to RMM is as follows. Related accounts are not normally combined for aggregation purposes, unless negotiated in advance.

Market Value of Portfolio Client Fee*

\$0 - \$49,999 2.35%

\$50,000 - \$499,999 2.00%

\$500,000 - \$749,999 1.85%

\$750,000 - \$999,999 1.60%

\$1,000,000 - \$1,999,999 1.35%

\$2,000,000 + 1.05%

Clients who wish to participate in the service will grant our firm a non-discretionary authority to trade in the mutual funds selected for the account of the client. In no case will RMM have access to the client's funds, which will be maintained in a brokerage account, except for billing purposes at the above scheduled rates. Our firm will, thereafter, manage the client's account as market conditions dictate by reallocating the funds in the client's accounts.

The purchase and the reallocation of the mutual funds are implemented through National Financial Services, a Fidelity company, using no-load and/or load-waived mutual funds and the client will have to pay certain nominal transaction costs, which are fully discussed in the advisory agreement. This includes a discussion of 12b1 fees paid to NFS and/or our firm by certain of the mutual funds.

ERISA Accounts

Retirement Money Management is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. . As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Retirement Money Management may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b1 fees, however, only when such fees are used to offset Retirement Money Management's advisory fees.

The initial fee is calculated from implementation date to the end of the calendar quarter or the end of the next calendar quarter (if the implementation date is within a few weeks of the calendar quarter end). Thereafter, the quarterly fees listed above are calculated on a quarterly basis and deducted from the client's NFS account at the beginning of each quarter. Girard will retain a portion of this annual fee and, in addition, charge \$100 per account annually. The client will receive a statement showing all fees which have been deducted and paid. The above fees are negotiated at the discretion of our firm. This service can be terminated after 30 days at any time by either party with a written request and unearned fees will be refunded on a pro-rated basis.

Passive Indexing Service

A derivation of the basic service described above is available for clients who want to attempt to minimize income taxes and/or want assurances of market return averages. The services offered are pertaining to assisting in implementation, providing monthly brokerage statements and providing portfolio-specific return computations. All other terms and conditions are as noted above in the Mutual Fund Selection and Monitoring Services. The fee structure payable to RMM for this service is as follows:

<u>Assets Managed</u>	<u>Annual Fee</u>
The first \$200,000	1%
The next \$300,000	.85%
The next \$500,000	.75%
Thereafter	Negotiable

Outside Assets/Employer Sponsored Plan, (401(k), 403(b) etc., Monitoring Service

For clients who have assets in an employer sponsored plan or some other account that cannot be transferred or monitored in accordance with levels of services offered, RMM can conduct periodic account reviews and will charge an asset-based fee on the total value of assets being monitored. This fee will be established prior to the start of the monitoring agreement, will be detailed in an asset management agreement and will generally range between 0.25% and 1% per year. As data for these accounts will not be transmitted to RMM on a daily basis (as is the case with most other programs), the client will be required to facilitate access to the account information by either providing electronic access to RMM or by sending (faxing, mailing, or emailing) the detailed periodic reports provided to the client by the custodian. Delivery of periodic analysis to the client will be dependent upon receipt of periodic account data supplied by the client.

Privately Managed Accounts

RMM will make privately managed accounts available to its clients. A portfolio manager manages these accounts on a discretionary basis, and the client owns the individual stocks and bonds in a brokerage account with NFS. Total fees for these types of accounts are 1% to 3%, which includes compensation to the manager (usually 1% or less), compensation to NFS (typically 0.25% to 0.50%) and compensation to Our firm typically .4% to 1.2%). RMM will commonly reduce its portion of the fee so that total fees are 2.5% or less. These fees are all inclusive, meaning there will not be any commissions charged for trades or any entry or exit fees. Note: Occasionally, clients may elect lower overall fees with trading commissions to be charged.

Other Implementation Services

RMM can also provide insurance and annuity products to its clients either through NFS or via its relationship with other insurance or annuity providers. Our firm will usually be compensated in the form of commissions (usually fee based) for providing these products to its clients. As with other services, RMM maintains no permanent affiliation with any company and has the ability to select products from what it believes to be the best providers in an effort to match the client's needs and objectives with the appropriate vehicle.

Retainer Services

In addition to ongoing monitoring and standard reporting provided on each investment portfolio (monthly statements are provided by NFS), RMM can provide additional reporting and financial plan maintenance services under our *Retainer Service*. For an annual fee of \$450, RMM will prepare comprehensive summary/performance reports for all assets that RMM is helping to track (usually those contained within NFS accounts). Additionally, RMM will schedule an annual financial planning meeting to review the client's overall situation, and update portions of the plan as required.

Other Consulting Services

RMM will normally charge hourly fees (or a flat fee if negotiated in advance) for services not discussed above. The scope of these services and the billing procedures will be detailed in the engagement letter specific to that situation.

Generally, *no-load Mutual Fund and Monitoring Services and Retainer Services* are provided in RMM's capacity as a Registered Investment Advisor. *Privately Managed Accounts* and *insurance/annuity products* are provided through NFS in RMM's capacity as an independent branch office of Girard Securities, Incorporated.

RMM requires that only a duly authorized representative of the firm can provide advice. Representatives are selected based upon comprehensive financial planning or investment knowledge and experience and/or upon proven credentials, such as, college degree in business, CFP®, CPA, CFA, CIMC, CIMA, CLU®, ChFC®, and/or extensive financial planning experience. No specific guidelines are established.

Mutual Fund Fees

All fees paid to Retirement Money Management for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses

In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s).

Grand fathering of Minimum Account Requirements

Pre-existing advisory clients are subject to Retirement Money Management's minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

Advisory Fees in General

Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

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

Item 7 Types of Clients

Retirement Money Management provides advisory services to the following types of clients: Individuals, Pension & profit sharing plans, Trusts, estates and charitable organizations.

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

METHODS OF ANALYSIS

Advice and Financial Planning Tools

RMM identifies the best technology for each of its client segments because no single program contains the functionality required to serve the individual needs and financial objectives of all of our Clients. RMM continually monitors the available features and benefits of various technology platforms to identify the solution that best supports our efforts to help clients achieve their financial goals.

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Charting	Cyclical
Fundamental	Quantitative
Technical	Qualitative

Risks for all forms of analysis

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

Advice and Financial Planning Tools

RMM identifies the best technology for each of its client segments because no single program contains the functionality required to serve the individual needs and financial objectives of all of our Clients. RMM continually monitors the available features and benefits of various technology platforms to identify the solution that best supports our efforts to help clients achieve their financial goals.

We also use the following factors in managing client accounts, provided that such information is available and appropriate to the needs of the client, investment objectives, risk tolerance, and time horizons, among income sources and tax information.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

FIRM Registrations

Retirement Money Management is a registered investment adviser with the SEC.

MANAGEMENT PERSONNEL Registrations

All of the Management personnel of our firm are separately licensed as registered representatives of National Financial Services, an affiliated FINRA member broker-dealer.

Clients should be aware that the receipt of additional compensation by Retirement Money Management and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making recommendations. Retirement Money Management endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Retirement Money Management and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and record keeping provisions.

Retirement Money Management's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to SStern@leenlee.com, or by calling us at 941-955-2099.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

Item 12 Brokerage Practices

As our firm does not have the discretionary authority to determine the broker-dealer to be used or the commission rates to be paid, clients must direct Retirement Money Management as to the broker-dealer to be used.

Our firm requests that clients direct us to place trades through National Financial Services. Retirement Money Management has evaluated National Financial Services and believes that it will provide our clients with a blend of execution services, commission costs and professionalism that will assist our firm to meet our fiduciary obligations to clients.

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker other than National Financial Services if we believe that this choice would hinder our fiduciary duty to the client and/or our ability to service the account. In directing the use of National Financial Services, it should be understood that Retirement Money Management will not have authority to negotiate commissions or to necessarily obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission

charges may exist between the commissions charged to the client and those charged to other clients (who may direct the use of another broker).

Clients should note, while Retirement Money Management has a reasonable belief that National Financial Services is able to obtain best execution and competitive prices, our firm will not be independently seeking best execution price capability through other brokers. Not all advisers require clients to direct it to use a particular broker-dealer.

For clients in need of brokerage or custodial services, and depending on client circumstances and needs, we may recommend the use of one of several brokers (including, but not limited to National Financial Services), provided that such recommendation is consistent with our firm's fiduciary duty to the client. Our clients must evaluate these brokers before opening an account. The factors considered by Retirement Money Management when making these recommendations are the broker's ability to provide professional services, our experience with the broker, the broker's reputation, the broker's quality of execution services and costs of such services, among other factors. Clients are not under any obligation to effect trades through any recommended broker.

Retirement Money Management has an arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides our firm with their "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like Retirement Money Management in conducting business and in serving the best interests of our clients but that may also benefit us.

Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables Retirement Money Management to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers. As part of the arrangement, Fidelity also makes available to our firm, at no additional charge to us, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by Retirement Money Management (within specified parameters). These research and brokerage services presently include services such as and are used by our firm to manage accounts for which we have investment discretion.

Retirement Money Management may also receive additional services which may include . Without this arrangement, we might be compelled to purchase the same or similar services at our own expense.

As a result of receiving such services for no additional cost, we may have an incentive to continue to use or expand the use of Fidelity's services. We examined this potential conflict of interest when we chose to enter into the relationship with Fidelity and have determined that the relationship is in the best interests of Retirement Money Management's clients and satisfies our client obligations, including our duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where we determine in good faith that the commission 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, while Retirement Money Management will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by us will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account. Retirement Money Management and Fidelity are not affiliated.

Item 13 Review of Accounts

INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly . Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by: Robert Lee CIMA,CFP,ChFC

REPORTS: In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide quarterly reports during update meetings summarizing account performance, balances and holdings.

PORTFOLIO MANAGEMENT SERVICES

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by: Robert Lee CIMA,CFP,ChFC

FINANCIAL PLANNING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

REPORTS: Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

CONSULTING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Consulting Services clients unless otherwise contracted for. Such reviews will be conducted by the client's account representative.

REPORTS: These client accounts will receive reports as contracted for at the inception of the advisory engagement.

Item 14 Client Referrals and Other Compensation

It is Retirement Money Management's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

OTHER COMPENSATION

Our firm and/or our officers and representatives are eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies or other investment products that we recommend.

While we endeavor at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

Item 15 Custody

Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell; and/or
- determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

As previously disclosed in Item 4 of this brochure, our firm does not provide discretionary asset management services.

Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other

type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

Item 18 Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Retirement Money Management has not been the subject of a bankruptcy petition at any time during the past ten years.