



## **Return on Investment, LLC**

### **Form ADV Part 2 – Disclosure Brochure**

**Effective: April 11, 2011**

This Brochure provides information about the qualifications and business practices of Return on Investment, LLC ("ROI"). If you have any questions about the contents of this Brochure, please contact us at (805) 569-2461.

ROI is a registered investment adviser registered with the U.S. Securities and Exchange Commission ("SEC"). The information in this Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an Investment Adviser does not imply any specific level of skill or training. The oral and written communications of an Adviser provide you with information to assist you in your decision to hire or retain an Adviser.

Additional information about ROI and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2 - Material Changes**

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On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the "Advisers Act"). The amendments are designed to require a registered investment adviser to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor's business practices, conflicts of interest and advisory personnel.

ROI believes that communication and transparency are the foundation of our relationship and we continually strive to provide you with complete and accurate information at all times. We encourage all current and prospective investors to read this Firm Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Initial Filing

ROI is an established registered investment advisor. This is the initial filing of the Firm Brochure in the new plain English format.

### Future Changes

From time to time, we may amend this Firm Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Firm Brochure or this summary of Material Changes shall be provided to each Client annually or if a material change is made.

At any time, you may view the current Firm Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. Enter **150950** (*our firm's CRD number*) into the search field and ADV Part 1 will be displayed. On the left navigation, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Firm Brochure at any time, by contacting us at (805) 569-2461.

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## Item 4 - Advisory Services

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### A. Firm Information

Return on Investment, LLC ("ROI" or the "Advisor") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The Advisor is organized as a limited liability company under the laws of the California. ROI was founded in 2001 by William R. DuBois, Managing Principal. Details regarding the Advisor and Mr. DuBois are contained in this Brochure.

### B. Advisory Services Offered

ROI offers investment services to institutional clients as well as high net worth and other individuals (each referred to as a "Client"). This Brochure provides Clients with information regarding ROI and the qualifications, business practices, and nature of investment services that should be considered before becoming an advisory client of ROI.

Return on Investment, LLC is a fee-only investment advisor firm that earns its compensation solely from the fees paid by its Clients. ROI does not receive any commissions from any third party company, so Return on Investment, LLC is free to choose securities and funds that it believes will benefit its Clients the most. In other words, ROI's primary goal and incentive is to meet and seek to exceed each Client's stated investment objectives.

#### Investment Management

ROI provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and investment consulting services. Each Client engagement begins with a thorough review of the Client's financial situation. The Advisor will develop a strategy to assist the Client in achieving their stated goals within their time horizon, tolerance for risk, tax situation and other relevant factors. The Advisor will develop investment solution(s) for each Client, which is typically defined in an investment policy statement. To implement the strategy, the Advisor often uses mutual funds, exchange listed securities, over-the-counter securities, foreign securities, corporate debt securities, commercial paper, certificates of deposit, municipal securities, United States government securities, and options on securities.

ROI's investment philosophy and methodology is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. ROI will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor. ROI may also recommend options, margin transactions and other investments that are appropriate for each Client in constructing their portfolio[s]. The Advisor may also recommend hedge funds, private equity funds and limited partnerships that invest in other limited partnerships in the secondary market. The Advisor will only recommend these investments to qualified and accredited investors for whom these investments are consistent with their objectives and profile.

ROI evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying its internal due diligence process. ROI may recommend, on occasion, rebalancing investment allocations to diversify the portfolio. ROI may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. ROI may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or to reduce any risk deemed unacceptable for the Client's risk tolerance.

## B. Advisory Services Offered - continued

ROI will provide investment advisory services and portfolio management services, but will not provide securities custodial services. At no time will ROI accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or bank account, pursuant to the Client Investment Advisory Agreement.

### Investment Consulting Services

ROI will often provide a variety of financial consulting services to Clients that are based on one or more areas of their financial situation. These consulting services are customized and targeted to the specific needs of each Client. Services will often include strategy development, research and due diligence services, and/or other administration and communication services. An investment consulting engagement will usually include general recommendations for a course of activity or specific actions to be taken by the Client. The deliverables for each engagement will be specific to the scope and need as agreed in a Consulting Agreement.

ROI may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation.

## C. Client Account Management

Prior to engaging ROI to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – ROI, in cooperation with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet those objectives.
- Asset Allocation – ROI will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – ROI will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – ROI will provide investment management and ongoing oversight of the Client's portfolio and overall account.

## D. Wrap Fee Programs

ROI does not place Client assets into a wrap fee program. Investment management services are provided directly by ROI.

## E. Assets Under Management

As of December 31, 2010, the most recent date for which such calculations are available, ROI manages the following assets:

Discretionary Assets	\$290,000,000
Non-Discretionary Assets	\$40,000,00
<b>Total</b>	<b>\$330,000,000</b>

## Item 5 - Fees and Compensation

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The following paragraphs detail the fee structure and compensation methodology for portfolio management and investment consulting services. Each Client shall sign an Investment Advisory Agreement or Consulting Agreement that details the responsibilities of ROI and the Client.

### A. Fees for Advisory Services

#### Investment Management

Investment Advisory Fees are paid quarterly, at the end of each quarter, pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each calendar quarter. Investment Advisory Fees range from 1.50% to 0.50% depending on the type and complexity of the investment management strategy[ies] employed as well as the size of the account or overall Client relationship. Relationships with multiple goals and objectives and other complexities may be charged a higher fee. The average Investment Advisory fee approximates 1.00% per annum. The minimum quarterly Investment Advisory fee is \$625.

Investment Advisory Fees in the first quarter of service are prorated from the inception date of the account to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. All securities held in accounts managed by ROI will be independently valued by the Custodian and/or fund managers. ROI will not have the authority or responsibility to value portfolio securities.

#### Investment Consulting Services

Some Clients will contract with the Advisor to perform strategy development, research and due diligence services, and/or other administration and communication services. These services are generally provided based on an hourly fee as follows:

- \$500 per hour for Investment Policy, Strategy and Guidelines Development
- \$300 per hour for Research and Due Diligence
- \$250 per hour for Performance Measurement and Process Reviews
- \$200 per hour for Investment Administration
- \$100 per hour for General Administration and Communications

The Advisor's hourly fees are based on the nature and complexity of the services being provided. The Advisor's hourly fees will be negotiated and agreed upon by the parties in advance. These services may also be negotiated on a fixed fee basis, which is generally based on the expected effort required to complete each engagement. Clients are billed on a quarterly basis and/or upon completion of work performed, but may be required to provide an advance payment of up to 50% of the expected cost of the services requested. Fees may be negotiated by the Advisor at its sole discretion. The Advisor's fees for investment consulting services are exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by the Client. The Advisor shall not receive any portion of these commissions, fees, and costs.

### B. Fee Billing

#### Investment Management

ROI will either invoice a Client directly or arrange for automatic deduction of its fees from the Client account[s], pursuant to the terms of an Investment Advisory Agreement. For Clients that are directly invoiced by the Advisor, ROI will send a quarterly invoice detailing the Investment Advisory Fees due for the period.

For Clients that have automatic fee deduction from the Custodian, the Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account, pursuant to the terms of the Investment Advisory Agreement. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with ROI at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee.

## **B. Fee Billing - continued**

It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting ROI to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

### Investment Consulting Services

Consulting fees are invoiced by the Advisor quarterly and/or upon completion of the engagement deliverables and are due upon receipt. Advance payment is not requested.

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third-parties, other than ROI, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by ROI is separate and distinct from these custodian and execution fees.

In addition, all fees paid to ROI for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of ROI, but would not receive the services provided by ROI which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by ROI to fully understand the total fees to be paid.

## **D. Advance Payment of Fees and Termination**

### Investment Management

ROI is compensated for its services quarterly in arrears. Clients may request to terminate their Investment Advisory Agreement with ROI, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

### Investment Consulting Services

In the event that a Client should wish to terminate an investment consulting agreement prior to delivery of the engagement deliverables, the Client shall be billed for actual hours logged on the engagement times the contractual hourly rate. Fixed fee agreements will be prorated based on the percentage completion of the engagement.

Either party may terminate a consulting agreement at anytime by providing written notice to the other party within five (5) days of signing the Advisor's consulting agreement. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds, if any, will be given on a pro-rata basis.

## **E. Compensation for Sales of Securities**

ROI does not buy or sell securities for commissions and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

## **Item 6 - Performance-Based Fees**

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ROI does not charge performance-based fees for its investment advisory services. The fees charged by ROI are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

ROI does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 - Types of Clients**

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ROI provides investment advisory services to institutional clients as well as high net worth and other individuals. ROI generally does not impose a minimum account size for establishing a relationship, but does require a minimum quarterly fee of \$625 on all accounts.

## **Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss**

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### **A. Methods of Analysis**

Research and analysis from ROI is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others. On occasion, ROI will conduct its own primary research.

ROI will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, ROI may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. ROI will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

When options are utilized in investment strategies, they are used for tactical entry/exit points or to reduce exposure to one or more existing positions.

### Options Contracts

Investments in option contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.



## B. Risk of Loss - continued

### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. The Client should only have a portion of their assets in these investments.

### Past Performance

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

## **Item 9 - Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving ROI or any of its employees.** ROI and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter 150950 in the field labeled "Firm IARD/CRD Number:". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Mr. DuBois by selecting the Investment Adviser Representative and entering Mr. DuBois' Individual CRD# 1592391 in the field labeled "Individual CRD Number:".

## **Item 10 - Other Financial Activities and Affiliations**

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ROI is a 50% owner in Working Capital, LLC ("WC"), an investment holding company for private investment on behalf of ROI and its partners. WC only provides services to ROI and its partners. Owners and employees of ROI spend less than 5% of normal business hours on matters relating to WC.

## **Item 11 - Code of Ethics, Participation in Client Transactions and Personal Trading**

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### **A. Code of Ethics**

ROI has implemented a Code of Ethics that defines our fiduciary commitment to each Client. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. ROI and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of ROI associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principals, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. ROI has written its Code of Ethics to meet and exceed regulatory standards. To obtain a copy of our Code of Ethics, please visit our website at <http://return-on-investment.com/docs/COE.pdf>.

## B. Personal Trading and Conflicts of Interest

ROI allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you. **At no time, will ROI or any associated person of ROI, transact in any security to the detriment of any Client.**

## Item 12 - Brokerage Practices

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### A. Recommendation of Custodian[s]

ROI does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize ROI to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, ROI does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where ROI does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by ROI. ROI may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. ROI does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers. Following are additional details regarding the brokerage practices of the Advisor:

1. **Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **ROI does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
2. **Brokerage Referrals** - ROI does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
3. **Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where ROI will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). ROI will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. ROI will execute its transactions through an unaffiliated broker-dealer selected by the Client. ROI may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 - Review of Accounts**

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### **A. Frequency of Reviews**

Accounts are monitored on a regular and continuous basis by Mr. DuBois, Managing Principal of the Advisor. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify ROI if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 - Client Referrals and Other Compensation**

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### **A. Compensation Received by ROI**

ROI is a Fee-Only advisor, who, in all circumstances, is compensated solely by the Client. ROI does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party. ROI may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, ROI may receive referrals of new Clients from a third-party.

### **B. Client Referrals from Solicitors**

ROI does not engage paid solicitors for Client referrals.

## **Item 15 - Custody**

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ROI does not accept or maintain custody of any Client accounts. All Clients must place their assets in a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct ROI to utilize that custodian for the Client's security transactions. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 - Investment Discretion**

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ROI generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by ROI. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement and/or a Limited Power of

Attorney containing all applicable limitations to such authority. All discretionary trades made by ROI will be in accordance with each Client's investment objectives and goals.

## **Item 17 - Voting Client Securities**

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ROI generally will not vote proxies for securities held in Client accounts. Upon request, ROI may provide guidance with respect to specific proxies. The Client retains the authority and responsibility for the voting of these proxies as detailed in the Client Investment Advisory Agreement.

## **Item 18 - Financial Information**

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Neither ROI, nor its management has any adverse financial situations that would reasonably impair the ability of ROI to meet all obligations to its Clients. Neither ROI, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. ROI is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

## **Privacy Policy**

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Effective: April 11, 2011

### **Our Commitment to You**

Return on Investment, LLC ("ROI") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. ROI (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does ROI provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

### **The Information We Collect About You**

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

- |   |                                  |
|---|----------------------------------|
| • Name and address                                  | • Assets                         |
| • E-mail address                                    | • Income                         |
| • Phone number                                      | • Account balance                |
| • Social security or taxpayer identification number | • Investment activity            |
|   | • Accounts at other institutions |

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

**Information About You That ROI Shares**

ROI works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy ROI' regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. To repeat, we do not sell your non-public personal information to anyone.

**Information About Former Clients**

ROI does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

**Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

**We'll Keep You Informed**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. To obtain a copy of our current privacy policy, please visit our website at <http://return-on-investment.com/docs/PrivacyPolicy.pdf>