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FORM ADV PART 2A
FIRM BROCHURE

This brochure provides information about the qualifications and business practices of Samrah Advisory Services. If you have any questions about the contents of this brochure, please contact SAS by phone at (248) 502-1215 or email Tim Atkinson at tim@nwlcmm.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 Samrah Advisory Services is available on the US Securities and Exchange Commission's website at www.adviserinfo.sec.gov. The searchable CRD number for Samrah Advisory Services is 154268.

Samrah Advisory Services is an SEC Registered Investment Adviser. Registration with the United States Securities and Exchange Commission does not imply a certain level of skill or training.

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Item 4 Advisory Business

Samrah Advisory Services (SAS) is a Registered Investment Advisor with the U.S. Securities and Exchange Commission. SAS and its client base are a subset of its predecessor firm Yolles-Samrah Wealth Management, LLC. SAS client relationships are long-term in nature and have been managed by Robert J. Samrah and Timothy P. Atkinson for ten years. Robert J. Samrah is President of Samrah Advisory Services and Timothy P. Atkinson is the Chief Compliance Officer. As of December 31, 2010, the firm managed 77 accounts on a discretionary basis with a market value of \$36,518,026.

Portfolio Management

Portfolio management of publicly traded securities held in the appropriate number of client accounts with an independent custodian. Each client signs an advisor agreement which authorizes the advisor to manage their accounts on a discretionary basis. Client accounts are registered in the client's name at an independent custodian. SAS executes all trades on the client's behalf but does not take custody of any client assets.

The foundation of our investment process is quantitative portfolio management and relative analysis to market and client benchmarks. Investment strategy is customized to each client financial situation with a strong emphasis on cash flows, growth rates and tax rates.

Net Worth Life Cycle Management

Net Worth Life Cycle Management encompasses 1) balance sheet preparation and analysis, 2) monetization process analysis, 3) performance measurement and risk analysis and 4) financial modeling using similar quantitative methods and statistical techniques successfully applied in SAS's portfolio management system.

Item 5 Fees and Compensation

Advisory fees are billed in arrears and calculated by multiplying assets under management (AUM) on the last business day of each calendar quarter times 1/4 of the annual fee rate as specified in the advisor agreement. Client will receive an invoice from advisor as part of their quarterly package which includes performance reports, portfolio position statements and market / economic situation analysis. The advisory fee will be deducted directly from a pre-designated client account in the month following quarter end and will also appear on the client's April, July, October and January custodian statements.

Advisory fees are computed at an annual rate between 50 bps and 100 bps. Fee is determined based on each family's overall relationship.

Client assets invested in mutual funds and/or exchange traded funds (ETFs) will also pay an indirect management fee to the manager of the fund. In the execution of an over-the-counter securities trade, the client will pay to Charles Schwab & Co., Inc. an agency commission and, in addition, will pay a market making contra broker a mark-up (down).

Client will incur additional transactional costs paid directly to Schwab in relation to the frequency of trading. Schwab's commission rates for equity and/or ETF trades are based on total household assets held at Schwab. The transaction fee for mutual fund trades is based on the dollar amount of the trade. SAS does not actively purchase mutual funds for client accounts; client mutual fund positions were transferred from another financial institution or are held because of low cost basis.

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

Not Applicable

Item 7 Types of Clients

High Net Worth Individuals and Families.

PORTFOLIO MANAGEMENT PHILOSOPHY

Cash Flow Discipline – The client investment policy setting process begins by analyzing one's financial situation, NWLC objectives and risk tolerance to create a cash flow forecast that incorporates taxes and investment time horizon. Net cash flows are reported on a monthly composite basis.

Quantitative Approach - The foundation of our investment process is quantitative portfolio management and relative analysis to market and client benchmarks. We analyze segment and sector risk and return stats to better understand what is driving performance and volatility and pay close attention to portfolio sector weights and individual security concentration. We continuously measure risk and return and report client portfolio performance on a monthly basis for each account (gross risk and return stats) and the composite portfolio net management fees.

Understand Return Drivers - We focus on three critical drivers of investment performance following a disciplined framework based on statistical methods (beta, alpha, absolute volatility measures, etc.) to better understand portfolio risk and return.

Discipline 1: **Investment Allocation**

Discipline 2: **Equity Allocation**

Discipline 3: **Security Selection and Trading**

Item 9 Disciplinary Information

None

Item 10 Other Financial Industry Activities and Affiliations

None

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

Samrah Advisory Services has adopted the CFA Institute Code of Ethics and Standards of Professional Conduct. SAS will provide a copy to any client or prospective client upon request.

Employees of Samrah Advisory Services are permitted to buy and/or sell the same securities recommended to SAS clients. SAS trading procedures are in place to ensure that clients receive priority when securities are purchased or sold. Employee trades are executed in the SAS master trading account and receive the average daily price. Employee positions are required to be held for a minimum of seven trading days.

A record of employee personal trading history is maintained in the SAS portfolio management system and also in the firm database. Trading records include the trade date, the activity (buy or sell), ticker symbol, shares, dollar value, and account number.

Item 12 Brokerage Practices

Samrah Advisory Services (SAS) recommends that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of client assets and to effect trades for their accounts. SAS is independently owned and operated and not affiliated with Schwab. Schwab provides SAS with access to its institutional trading and custody services which are typically not available to Schwab retail investors. In addition, Schwab provides access to several mutual funds that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment.

The above services are generally available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets is maintained in accounts at Schwab Institutional, and is not otherwise contingent upon Advisor committing to Schwab any specific amount of business such as assets in custody or trading.

Item 13 Review of Accounts

Robert J. Samrah, CFA (President) reviews each account including monthly gross and net return data, net cash flow, and risk metrics. Account analysis is conducted on a monthly basis. Robert also regularly monitors the financial markets, SAS's core ETF securities, and other individual securities held in client accounts.

Timothy P. Atkinson, MSF (Chief Compliance Officer) reviews account billing, asset allocation, cash flow management, trading, and performance reporting.

SAS provides performance reports, position statements, and advisory fee invoices at the conclusion of each calendar quarter. SAS also provides tax documents such as cost basis, unrealized and realized Gain and Loss Reports on a periodic basis.

The custodian will also mail or email monthly account statements, trade confirmations, shareholder documentation, and tax documentation.

Item 14 Client Referrals and Other Compensation

Not applicable

Item 15 Custody

Not applicable

Item 16 Investment Discretion

Client grants SAS discretionary authority to manage security accounts by executing the SAS advisory agreement. In addition, the Schwab application contains a Limited Power of Attorney (LPOA) which authorizes the advisor to execute trades, disburse funds and deduct advisory fees.

Item 17 Voting Client Securities

Client will receive proxies and other shareholder communication directly from the custodian Charles Schwab & Co, Inc. SAS does not vote client proxies.

Item 18 Financial Information

Not Applicable.

Item 19 State Advisors

Not applicable.