

# Disclosure Brochure

July 17, 2015

## **LHF Wealth Advisory Services LLC**

*a Registered Investment Adviser*

529 Fifth Avenue, 9<sup>th</sup> Floor  
New York, NY 10017

(212) 808-0146

[www.lhfwas.com](http://www.lhfwas.com)

This brochure provides information about the qualifications and business practices of LHF Wealth Advisory Services LLC (herein after "LHF"). If you have any questions about the contents of this brochure, please contact Vincent W. Perna at (212) 808-0146. 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 LHF Wealth Advisory Services LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

LHF Wealth Advisory Services LLC is an SEC registered investment adviser. Registration does not imply any level of skill or training.

## **Item 2. Material Changes**

This Item discusses only the material changes that have occurred since LHF's last annual update February 20, 2015. LHF has no material changes to disclose to this Item:

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## Item 4. Advisory Business

LHF has been in business since December 13, 2010. Vincent W. Perna, John Perna, and Richard Barber are the principal owners of LHF; however, John Perna and Richard Barber are passive investors and are not directly involved in the day to day activities of LHF.

LHF is an investment adviser that provides investment management services. Prior to engaging LHF to provide any of the foregoing investment advisory services, the client is required to enter into one or more written agreements with LHF setting forth the terms and conditions under which LHF renders its services (collectively the “*Agreement*”). Neither LHF nor the client may assign the *Agreement* without the consent of the other party. A transaction that does not result in a change of actual control or management of LHF is not considered an assignment.

LHF has \$37,207,332 of assets under management as of December 31, 2014. All of these assets are managed on a discretionary basis.

This disclosure brochure describes the business of LHF. Certain sections will also describe the activities of *Supervised Persons*. *Supervised Persons* are any of LHF’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on LHF’s behalf and is subject to LHF’s supervision or control.

### Investment Management Services

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LHF provides clients with investment management services which generally includes discretionary and/or non-discretionary management of investment portfolios. LHF provides these services to individuals, pension and profit sharing plans, trusts and estates.

LHF primarily allocates clients’ investment management assets on a discretionary and/or a non-discretionary basis among mutual funds, exchange-traded funds (“ETFs”), individual debt and equity securities and/or options. LHF may also recommend variable annuities and life insurance contracts when consistent with a client’s individual investment objectives.

LHF also may render non-discretionary investment management services to clients relative to variable life/annuity products that they may own, their individual employer-sponsored retirement plans, and/or 529 plans or other products that may not be held by the client’s primary custodian. In so doing, LHF either directs or recommends the allocation of client assets among the various investment options that are available with the product. Client assets are maintained at the specific insurance company or custodian designated by the product.

LHF tailors its advisory services to the individual needs of its clients. LHF ensures that clients’ investments are suitable for their investment needs, goals, objectives and risk tolerance. Clients maintain the ability to instruct LHF not to purchase securities or types of securities.

Clients are advised to promptly notify LHF if there are changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon LHF's management services.

## **Financial Planning and Consulting Services**

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To the extent a client specifically requests, LHF may consult with clients regarding financial planning issues, but generally does not provide written formal financial plans. If a client requires additional financial planning services, LHF may engage other financial professionals to render financial planning services on behalf of the client. Such professionals may provide LHF's clients with a broad range of comprehensive financial planning services, which may include tax-related and other non-investment related matters. These services may address, without limitation, a client's business planning, investments, insurance, retirement, education, estate planning, and tax and cash flow needs.

When recommending or engaging an outside financial planning professional for a client, LHF reviews information about the individual or entity, such as its disclosure statement and/or material supplied by the financial planner or independent third parties. The financial planning fees charged by the designated professional may be exclusive of, and in addition to, LHF's investment management fee. Clients may therefore incur additional fees than those charged by LHF and the corresponding broker-dealer and custodian.

In performing these services, neither LHF nor its outside professionals are required to verify any information received from the client or the client's other professionals (e.g., attorney, accountant, etc.). LHF's clients expressly authorize reliance on such information.

LHF and/or the financial planning professionals may recommend their own services to implement the recommendations provided through the financial planning relationship. Clients are advised that a conflict of interest exists if the outside financial planning professional recommends its own services or the services of LHF. Clients are under no obligation to act upon any of the recommendations made under a financial planning or consulting arrangement. Clients retain absolute discretion over all such implementation decisions and are free to accept or reject any recommendations.

Moreover, clients are advised that it remains their responsibility to promptly notify LHF if there are changes in their financial situations or investment strategies, for the purpose of reviewing, evaluating or revising previous recommendations or services.

## **Item 5. Fees and Compensation**

LHF offers its services for a fee based on a percentage of assets under management. Alternatively, certain of LHF's *Supervised Persons* may offer insurance products under a commission arrangement.

# LHF Wealth Advisory Services LLC Disclosure Brochure

## Investment Management Fee

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LHF provides investment management services for a fee based on a percentage of the market value of the assets managed by LHF. LHF's annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which is incurred by the client. LHF does not receive any portion of these commissions, fees, and costs. LHF's annual fee is prorated and charged quarterly, in arrears, based upon the market value of the assets being managed by LHF on the last day of the previous quarter. The annual fee varies (between 1.25% and 1.50%) depending upon the market value of the assets under management:

<b><u>PORTFOLIO VALUE</u></b>	<b><u>BASE FEE</u></b>
Up to \$1,000,000.00	1.50 %
Above \$1,000,000.00	1.25 %

LHF, in its sole discretion, may negotiate to charge a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, *pro bono* activities, etc.).

## Financial Planning Fees

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As stated above, LHF may recommend the services of an outside investment adviser for financial planning or engage an outside adviser on the client's behalf. The fees for such service are agreed upon prior to the services being rendered.

## Fees Charged by Financial Institution

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As further discussed in response to Item 12 (below), LHF generally recommends that clients utilize the brokerage and clearing services of Schwab Advisor Services™ ("*Schwab*") and TD AMERITRADE Institutional, a division of TD AMERITRADE, Inc. ("*TD Ameritrade*") for investment management accounts.

LHF implements its investment management recommendations only after the client furnishes LHF with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions include, but are not limited to *Schwab and TD Ameritrade*, any other broker-dealer recommended by LHF, any broker-dealer directed by the client, trust companies, banks etc. (collectively referred to herein as the "*Financial Institutions*").

Clients may incur certain charges imposed by the *Financial Institutions* and other third parties such as custodial fees and charges imposed directly by a mutual fund or ETF in the account, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and

taxes on brokerage accounts and securities transactions. Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to LHF's fee.

LHF's *Agreement* and the separate agreement with the *Financial Institution(s)* may authorize LHF to debit the client's account for the amount of LHF's fee and to directly remit that management fee to LHF. The *Financial Institutions* recommended by LHF have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to LHF.

## **Fees for Management During Partial Quarters of Service**

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For the initial period of investment management services, the fees will be calculated on a *pro rata* basis. If assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable with respect to such assets will not be adjusted or prorated.

The *Agreement* between LHF and the client will continue in effect until terminated by either party pursuant to the terms of the *Agreement*. LHF's fees shall be prorated through the date of termination and any remaining balance shall be charged or refunded to the client, as appropriate.

## **Additions and Withdrawals to Accounts**

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Clients may make additions to and withdrawals from their account at any time, subject to LHF's right to terminate an account. Clients may withdraw account assets on notice to LHF, subject to the usual and customary securities settlement procedures. However, LHF designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives.

Additions may be in cash or securities provided that LHF reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. LHF may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

## **Item 6. Performance-Based Fees and Side-by-Side Management**

LHF does not provide any service for a performance-based fee. Performance-based fees are those based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7. Types of Clients

LHF provides its services to individuals, pension and profit sharing plans, charitable organizations, corporations and other businesses, and trusts and estates.

### Minimums Imposed By Outside Managers

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LHF does not impose a minimum portfolio size or minimum annual fee. Certain professionals, such as the financial planning professionals discussed above, may impose more restrictive account requirements and varying billing practices than LHF. In such instances, LHF may alter its corresponding practices to accommodate those of the outside consultant.

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

LHF undertakes a comprehensive, needs-based assessment of each client's investment objectives and risk tolerance, and employs a diversified, long-term approach to managing client assets. LHF tailors each individual portfolio to account for a client's financial situation, personal lifestyle and income requirements. LHF's primary methods of analysis is a combination of technical and fundamental methods.

*Technical analysis* focuses on long- and short-term market trends. These historic data trends may not necessarily be indicative of future performance, and even if trends do reoccur, there is no guarantee that LHF will be able to accurately predict such. Technical analysis does not incorporate economic fundamentals and, therefore, does not account for certain other developments that may affect the price of a security or option, such as forecasted GDP growth, consumption data, employment trend, interest rate forecasts, and housing market conditions.

*Fundamental analysis* involves the fundamental condition and competitive position of a company. LHF analyzes the financial condition, capabilities of management, earnings, new products and services, as well as the company's market and position amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

### Market Risk

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The profitability of a significant portion of LHF's recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that LHF will be able to predict those price movements accurately.



## **Mutual Funds and Exchanged-Traded Funds (ETFs)**

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An investment in a mutual fund or ETF ("Fund") involves risk, including the loss of principal. Funds are subject to secondary market trading risks. Shares of Funds will be listed for trading on an exchange, however, there can be no guarantee that an active trading market for such shares will develop or continue. There can be no guarantee that a Fund's exchange listing or ability to trade its shares will continue or remain unchanged. Shares of the Fund may trade on an exchange at prices at, above or below their net asset value ("NAV"), which is the price at which an investor would buy or sell the Fund. The per share NAV of a Fund is calculated at the end of each business day, and fluctuates with changes in the market value of the Fund's holdings. The trading prices of a Fund's shares may differ significantly from NAV during periods of market volatility, which may, among other factors, lead to an ETF's shares trading at a premium or discount to NAV.

## **Options**

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LHF may recommend the use of options for certain clients. Options allow LHF to buy or sell a security at a contracted "strike" price (not necessarily the current market price). Options transactions contain a number of inherent risks, including the total loss of principal in the case that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer who may be unwilling or unable to perform its contractual obligations. LHF may at times utilize leverage, such as that embedded in options, which can magnify gains and losses and cause LHF to liquidate its positions to satisfy its obligations.

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

## **Item 9. Disciplinary Information**

LHF is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. LHF does not have any required disclosures to this Item.

## **Item 10. Other Financial Industry Activities and Affiliations**

LHF is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons. LHF has described such relationships and arrangements below.

## Receipt of Insurance Commission

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Certain of LHF's *Supervised Persons*, in their individual capacities, are also licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. While LHF does not sell such insurance products to its investment advisory clients, LHF does permit its *Supervised Persons*, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A conflict of interest exists to the extent that LHF recommends the purchase of insurance products where LHF's *Supervised Persons* receive insurance commissions or other additional compensation. LHF's *Supervised Persons* currently devote approximately five percent (5%) of their time to insurance sales.

## Referrals to Related Certified Public Accountants

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LHF does not render accounting advice or tax preparation services to its clients. Rather, to the extent that a client requires accounting advice and/or tax preparation services, LHF, if requested, will recommend the services of a Certified Public Accountant, all of which services shall be rendered independent of LHF pursuant to a separate agreement between the client and the Certified Public Accountant. LHF shall not receive any of the fees charged by any recommended Certified Public Accountant, referral or otherwise.

Specifically, the certain principals of LHF, John Perna, Richard Barber, and Charles Fazio, are also principals of L.H. Frishkoff & Co., LLP ("*L.H. Frishkoff*"), a Certified Public Accounting firm located in New York, New York. The principal place of business of *L.H. Frishkoff* is the same as that of LHF.

As discussed above, to the extent that *L.H. Frishkoff* provides accounting and/or tax preparation services to any of LHF's clients, all such services shall be performed by *L.H. Frishkoff*, in its separate capacity, independent of LHF, for which services LHF shall not receive any portion of the fees charged by *L.H. Frishkoff*, referral or otherwise. Although LHF shall not receive referral fees from *L.H. Frishkoff*, these individual members of *L.H. Frishkoff* shall be entitled to receive distributions relative to their respective ownership interests in *L.H. Frishkoff*.

It is also expected that these members of LHF, solely incidental to their respective practices as Certified Public Accountants with *L.H. Frishkoff*, shall recommend LHF's services to certain of *L.H. Frishkoff*'s clients. Although *L.H. Frishkoff* shall not receive referral fees from LHF, these individual members of LHF shall be entitled to receive distributions relative to their respective ownership interests in LHF.

Neither *L.H. Frishkoff*, nor any of its employees, currently render investment advice on behalf of LHF.

## Item 11. Code of Ethics

LHF and persons associated with LHF (“Associated Persons”) are permitted to buy or sell securities that it also recommends to clients consistent with LHF’s policies and procedures.

LHF has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws (“*Code of Ethics*”). LHF’s *Code of Ethics* contains written policies reasonably designed to prevent the unlawful use of material non-public information by LHF or any of its associated persons. The *Code of Ethics* also requires that certain of LHF’s personnel (called “*Access Persons*”) report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

When LHF is engaging in or considering a transaction in any security on behalf of a client, no *Access Person* may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the *Access Person*) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the *Access Person* is completed as part of a batch trade (as defined below in Item 12) with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

This *Code of Ethics* has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by *Access Persons* to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated above.

Clients and prospective clients may contact LHF to request a copy of its *Code of Ethics*.

## Item 12. Brokerage Practices

As discussed above, in Item 5, LHF shall generally recommend that clients utilize the brokerage and clearing services of *Schwab* and *TD Ameritrade* for investment management accounts.

LHF participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA, an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. LHF receives some benefits from TD Ameritrade through its participation in the program.

Factors which LHF considers in recommending *Schwab* and *TD Ameritrade* or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. *Schwab* and *TD Ameritrade* may enable LHF to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by *Schwab* and *TD Ameritrade* may be higher or lower than those charged by other Financial Institutions.

The commissions paid by LHF's clients to *Schwab* and *TD Ameritrade* comply with LHF's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where LHF determines that the commissions are 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 Financial Institution's services, including among others, the value of research provided, execution capability, commission rates and responsiveness. LHF seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker/dealers in return for investment research products and/or services which assist LHF in its investment decision-making process. Such research generally will be used to service all of LHF's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because LHF does not have to produce or pay for the products or services.

LHF periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

### Software and Support Provided by Financial Institutions

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LHF may receive without cost from *Schwab* and *TD Ameritrade* computer software and related systems support, which allow LHF to better monitor client accounts maintained at *Schwab* and *TD Ameritrade*.

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LHF may receive the software and related support without cost because LHF renders investment management services to clients that maintain assets at *Schwab and TD Ameritrade*. The software and support is not provided in connection with securities transactions of clients (i.e., not “soft dollars”). The software and related systems support may benefit LHF, but not its clients directly. In fulfilling its duties to its clients, LHF endeavors at all times to put the interests of its clients first. Clients should be aware, however, that LHF’s receipt of economic benefits from a broker/dealer creates a conflict of interest since these benefits may influence LHF’s choice of broker/dealer over another that does not furnish similar software, systems support or services.

Specifically, LHF may receive the following benefits from *Schwab and TD Ameritrade*:

- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its institutional traders;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and
- Access to an electronic communication network for client order entry and account information.

There is no direct link between LHF’s participation in TD Ameritrade’s institutional customer program and the investment advice it gives to its clients, although LHF receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. Additionally, LHF may receive the following benefits from TD Ameritrade through its registered investment adviser division: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Registered Investment Adviser participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information. The Firm also has the ability deduct advisory fees directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Firm by third party vendors. TD Ameritrade may fund business consulting and professional services received by LHF’s related persons.

Some of the products and services made available by TD Ameritrade through the program may benefit LHF but not its client. These products or services may assist LHF in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help LHF manage and further develop its business enterprise. The benefits received by LHF’s participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade.

## Brokerage for Client Referrals

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LHF does not consider, in selecting or recommending broker/dealers, whether LHF receives client referrals from the Financial Institutions or other third party.

## Directed Brokerage

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The client may direct LHF in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and LHF will not seek better execution services or prices from other Financial Institutions or be able to “batch” client transactions for execution through other Financial Institutions with orders for other accounts managed by LHF (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, LHF may decline a client’s request to direct brokerage if, in LHF’s sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

## Trade Aggregation

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Transactions for each client generally will be effected independently, unless LHF decides to purchase or sell the same securities for several clients at approximately the same time. LHF may (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among LHF’s clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among LHF’s clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that LHF determines to aggregate client orders for the purchase or sale of securities, including securities in which LHF’s Supervised Persons may invest, LHF generally does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. LHF does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that LHF determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation,

shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, LHF may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

### **Item 13. Review of Accounts**

For those clients to whom LHF provides investment management services, LHF monitors those portfolios as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis. For those clients to whom LHF provides financial planning and/or consulting services, reviews are conducted on an "as needed" basis. Such reviews are conducted by the President of LHF, Vincent Perna. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with LHF and to keep LHF informed of any changes thereto. LHF shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. Those clients to whom LHF provides investment advisory services will also receive a report from LHF that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance on a quarterly basis. Clients should compare the account statements they receive from their custodian with those they receive from LHF.

Those clients for whom LHF arranges financial planning services may receive reports from LHF, or the agreed upon outside financial planning professional, summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by LHF.

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

LHF is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. In addition, LHF is required to disclose any direct or indirect compensation that it provides for client referrals.

LHF may receive economic benefits from non-clients for providing advice or other advisory services to clients. This type of relationship poses a conflict of interest and any such relationship is disclosed in response to Item 10, above.

### Item 15. Custody

LHF's *Agreement* and/or the separate agreement with the *Financial Institution(s)* may authorize LHF through the *Financial Institution(s)* to debit the client's account for the amount of LHF's fee and to directly remit that management fee to LHF in accordance with applicable custody rules.

The *Financial Institution(s)* recommended by LHF have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to LHF. In addition, as discussed in Item 13, LHF also sends periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the *Financial Institution(s)* and compare them to those received from LHF.

### Item 16. Investment Discretion

LHF may be given the authority to exercise discretion on behalf of clients. LHF is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. LHF is given this authority through a power-of-attorney included in the agreement between LHF and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). LHF takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold; and
- When transactions are made.

### Item 17. Voting Client Securities

LHF is required to disclose if it accepts authority to vote client securities. LHF does not vote client securities on behalf of its clients.

### Item 18. Financial Information

LHF is not required to disclose any financial information pursuant to this Item due to the following:



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- LHF does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- LHF does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- LHF has not been the subject of a bankruptcy petition at any time during the past ten years.

## **LHF Wealth Advisory Services LLC**

*a Registered Investment Adviser*

529 Fifth Avenue, 9<sup>th</sup> Floor  
New York, NY 10017

(212) 808-0146

[www.lhfwas.com](http://www.lhfwas.com)

Prepared by:



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*The Adviser's Advisor®*