

**Item 1 – Cover Page**

**ROWE CONSULTING GROUP, LLC**

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Date of Brochure: October 12, 2011

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This brochure provides information about the qualifications and business practices of Rowe Consulting Group, LLC. If you have any questions about the contents of this brochure, please contact Robert Rowe at (312) 913-9872 (office) or (312) 933.7987 (cell) or [rbr@enhancedinvesting.com](mailto:rbr@enhancedinvesting.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 Rowe Consulting Group, LLC is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view our firm's information on this website by searching for Rowe Consulting Group, LLC. You may search for information by using the firm's CRD number. The CRD number for Rowe Consulting Group, LLC is **CRD# 155611**.

\*Registration as an investment advisor does not imply a certain level of skill or training.

## **Item 2 – Material Changes**

On July 28, 2010, the United States Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that Rowe Consulting Group, LLC provides to clients as required by applicable rules and regulations. This Disclosure Brochure dated October 12, 2011 is an amendment to our original brochure dated November, 2010. In the future, this item will discuss only specific material changes that are made to the Disclosure Brochure and provide readers with a summary of such changes. We will also reference the date of the last annual update of the brochure.

In the past our firm has offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new rules, we will ensure that you receive a summary of any material changes to this and subsequent Disclosure Brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 of each year. At that time we will also offer a copy of the most current Disclosure Brochure. We may also provide other ongoing disclosure information about material changes as necessary.

### **Material Changes in the Brochure:**

- Based upon current regulatory requirements Rowe Consulting Group, LLC is transitioning from an SEC Registered Investment Advisory firm to a Registered Investment Advisory firm registered with the State of Illinois.
- The firm has ceased using the doing business as (DBA) name of R Consulting LLC.
- Robert Rowe is replacing Ed Murray as the Chief Compliance Officer of Rowe Consulting Group, LLC.

### Item 3 – Table of Contents

**\*This Table of Contents and the headings used throughout the Disclosure Brochure are written in a manner designed to comply with the specific heading requirements of the Illinois Securities Department.**

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## Item 4 – Advisory Business

### **A. Description of Advisory Firm**

**Description of Advisory Firm** – Rowe Consulting Group, LLC is an investment advisor applying for registration with the State of Illinois and is a Limited Liability Company formed under the laws of the State of Illinois.

**Number of Years in Business** - Rowe Consulting Group, LLC (formerly as R Consulting Group LLC) became approved as a Registered Investment Advisory with the U.S. Securities and Exchange Commission in November 2010 and was approved to do business within the state of Illinois via notice filing in February 2011. This amended filing is designed to transition Rowe Consulting Group, LLC from SEC registration to State registration.

**Principal Owners Identified** - The firm's controlling owner and managing member is Robert B. Rowe Jr. Full details of his education and business background are provided at Item 19 of this Disclosure Brochure.

### **B. Description of Advisory Services Offered**

The following are brief descriptions of Rowe Consulting Group, LLC's primary services. A detailed description of Rowe Consulting Group, LLC's services is provided in *Item 5 – Fees and Compensation* so that clients and prospective clients can review the services and description of fees in a side-by-side manner.

**Investment Management Consulting Services**- Rowe Consulting Group, LLC provides investment consulting services to mid-market defined benefit and defined contribution (401-k) retirement plans. Services offered primarily utilize "un-bundled" independent investment providers allowing for maximum flexibility in the selection of investment vehicles, strategies and retirement service professionals; within a fully transparent, non-conflicted, fiduciarily compliant investment platform.

Services provided are the oversight and proactive guidance of retirement plan assets with particular focus toward dynamic investment strategy, risk recognition and cost reduction. We work with each investment committee and their trustees through proactive, educational and interactive communication.

**Domestic Equity Investment Management Strategy** - Rowe Consulting Group, LLC provides (as part of our investment consulting services) a proprietary domestic Equity investment Rotational (EIR) methodology. These services involve providing clients with continuous oversight and on-going supervision and re-allocation over their domestic equity portfolios. It is generally expected that recommendations for asset re-weightings will be communicated to the designated fiduciary or investment committee representative for their completion. The strategy may be employed utilizing the clients existing investment vehicles (independent investment managers, exchange traded funds, or no-load mutual funds) dependent upon the clients desires and the suitability of the investments within the objectives of the EIR methodology (equity style and capitalization adherence).

**Asset Management and Selection Services** - Rowe Consulting Group, LLC provides advisory services in the form of Asset Management and Selection Services. Asset Management and Selection Services involve providing clients with selection, recommendations and continuous and on-going review of investment vehicle recommendations which have been provided to our current clients. This means that

Rowe Consulting Group, LLC will monitor a client's account on at least a quarterly basis and make recommendations as when necessary and appropriate.

**Investment Manager Review and Selection** - Rowe Consulting Group, LLC provides advisory services through the proprietary evaluation and recommendations of independent unaffiliated investment managers (money managers) that are registered or exempt from registration as investment advisors. These third-party investment managers are responsible for continuously monitoring client accounts and evaluating and making trade decisions in client accounts which are consistent with the established objectives, investment strategy and suitability of the client.

**Investment Planning Services** - Rowe Consulting Group, LLC provides advisory services in the form of investment planning services. Investment planning services do not involve the active management of client accounts, but instead focuses on a client's overall investment situation based upon their written investment goals and objectives (Investment Policy Statement or IPS). Investment planning can be described as assisting high net worth individuals and their families determine and set their long-term financial goals, and to assist in the selection of appropriate and suitable long term investment strategies and asset allocations structures to meet the goals, as established, within the investment policy statement. It is generally expected that the client will employ other professionals to coordinate tax, estate planning and retirement cash flow requirements. The role of an investment planner is to work with those professionals and to find ways to help the client understand his/her overall financial situation.

**Limits Advice to Certain Types of Investments** - Rowe Consulting Group, LLC provides investment consulting advice on the following types of investments.

- No-Load (i.e. no trading fee) and Load-Waived (i.e. trading fee waived) Mutual Fund Shares
- Independent Investment Managers (equity , fixed Income and international)
- Fixed Income Securities (i.e. bonds and bond funds)
- Closed-End Funds and Exchange Traded Funds (ETFs); (equity, fixed Income and international)
- United States Government Securities
- Interests in Limited Partnerships (investing in oil and gas interests and domestic equity hedge funds)

Rowe Consulting Group, LLC does not provide advice on exchange-listed equity securities (i.e. stocks), securities traded over-the-counter (i.e. stocks), foreign Issues, warrants, commercial paper, certificates of deposit, municipal securities, options contracts on securities, options contracts on commodities, future contracts on tangibles, variable life insurance, variable annuities, intangibles, fixed income and global hedge funds, interests in partnerships investing in real estate and other types of private (i.e. non-registered) securities.

When providing Investment Consulting Services, the firm will typically review and evaluate the clients investment holdings from a perspective of suitability, expense, historic performance, expected future performance, diversification, and equity style and capitalization adherence within the written investment guidelines of the plan. We will attempt to include all suitable investment alternatives which we feel are appropriate for the client within our recommendations, including mutual funds, ETF's, and separately managed accounts.

While we are not "market timers" we expect to provide dynamic equity and fixed income recommendations to investment committees and clients that may increase cash holdings and overweight and or underweight domestic equity and fixed income allocations of the client portfolio as deemed appropriate, based upon the EIR methodology, clients risk tolerance, goals, objectives and our

expectations of the current economic outlook and market behavior. We may modify our investment strategy to accommodate special situations such as: company stock, low basis stock and stock options (for retirement plans); as well as legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations (for individuals).

*(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)*

### **C. Client Tailored Services and Any Client Imposed Restrictions**

Rowe Consulting Group, LLC's services are always provided based on the individual needs of each client. Each client is given the ability to impose appropriate restrictions on the accounts we manage for them, including specific investment selections and sectors. We work with each client on a one-on-one basis through interviews and questionnaires to determine each client's investment objectives and suitability information, and where appropriate prepare a written investment policy (goals and objectives) statement.

In our managing client accounts utilizing the Equity Investment Rotation methodology, we expect to direct the client's account in accordance with one or more of the available investment strategies. When client accounts are managed using models (aggressive, moderate and conservative), investment selections are based on the underlying model and we do not develop customized (or individualized) portfolio holdings for each client. However, the determination to use a particular model or models is always based on each client's individual investment goals, objectives and risk mandates.

### **D. Wrap Fee Programs**

Rowe Consulting Group, LLC does not participate or sponsor any wrap fee programs. A wrap fee program has been defined by regulators as a program whereby advisory services and transactions services are provided under one all-inclusive fee. Our advisory services are billed separately from transaction costs. For our services, your account will be billed either directly by the broker/dealer for transactions effected in the account, or directly from Rowe Consulting Group LLC..

### **E. Client Assets Under Management**

The amount of clients assets managed by Rowe Consulting Group LLC totaled \$0 as of September 30, 2011. \$ 0 are managed on a discretionary basis and \$ 0 are managed on a non-discretionary basis.

## **Item 5 – Fees and Compensation**

### **A. Means of Compensation Described**

In addition to the information provided in *Item 4 – Advisory Business*, this section provides details regarding our services along with descriptions of each service's fees and compensation arrangements.

Please note that our fees may be higher than fees charged by other financial professionals providing similar services.

**Investment Management Consulting Services:** Fees are based upon the amount of assets entrusted to our responsibility and care as well as the duties and services expected and mutually agreed upon in writing.

**Domestic Equity Investment Management Strategy:** is only available in conjunction with our consulting services for high-net-worth individuals and their families and mid-market and below qualified plans. The Equity Investment Rotation Methodology is not generally available through Rowe Consulting Group LLC. to institutional level (\$25,000,000.00 and above) qualified retirement plans. For the institutional qualified retirement plan marketplace, the equity investment rotation methodology is available through a select group of institutional investment consulting organizations.

**Asset Management and Selection Services:** The Asset Management and Review Services are generally provided within an asset based fee structure.

**Investment Manager Review and Selection:** The Investment Manager Review and Selection Services [if not provided within the context of our investment consulting services] fees are \$7,500.00 per manager for each asset class reviewed.

**Investment Planning Services:** Investment Planning Services are generally only available within our investment consulting services platform, and with an agreed minimum time period. If other consultation arrangements are preferred, the fee will be assessed based upon the length of time required (minimum 7 hours, with a minimum per hour fee of \$450.00 per hour).

If you elect to engage us for these services, we will provide documented analysis of our findings which are consistent with your current stated financial goals and objectives, investment attitudes and risk/reward parameters.

**Hourly Financial Planning Consulting Program:** Rowe Consulting Group, LLC also offers consultation services on any topic of interest to the client that falls within our experience, knowledge and comfort zone. Consultation services can include general non-securities advice on topics such economic and investment market opinions, forecasting, retirement plan structure, personal finances and business planning. Rowe Consulting Group, LLC does not provide legal or tax advice. Clients are encouraged to seek proper legal and tax counsel. You can also request advice on one or more specific areas or topics of concern, and these consultations can be a one-time event or involve several meetings. Consultations are usually billed at an hourly rate.

Hourly fees are billed at a rate of \$450.00 per hour.

For extended consultations or projects billed at an hourly rate, our representatives will provide an estimate of the time needed to complete the requested consultations, in advance. You have the ultimate decision as to how long consultations last.

Either party can also terminate the advisory services agreement prior to completion by providing written notice to the other party. Termination will be effective upon receipt of notice. If terminated within five business days of signing the advisory agreement, services are terminated without penalty. If the agreement is terminated after five business days but prior to completion of services, at the option of Rowe Consulting Group, LLC's associated persons, clients may be responsible for the time expended and expenses disbursed prior to receipt of the termination notice. In this case, Rowe Consulting Group, LLC will provide clients with a statement detailing the time and expenses due.



## **Asset Management**

We offer asset management services, including giving continuous investment advice and/or making investments for you based on your individual needs, goals and objectives. We offer a customized and individualized investment program, and our representatives meet with you to determine your investment objectives, risk tolerances and appropriate asset mixes. Generally, accounts are invested in a broad spectrum of no-load (no commission) mutual funds, index-based securities, exchange traded funds (ETF's), individual equities/stocks, bonds, money market accounts, certificates of deposit or Treasury bills and or may be directed by authorized individuals of Rowe Consulting Group, or retained investment managers of the clients choosing.

We will need to obtain certain information from you to determine the plans or individual's financial situation and investment objectives. Accounts are therefore managed on the basis of each individual financial situation and investment objectives. From time to time, you are reminded to notify us whether these financial circumstances or investment objectives have changed, or if you, the client, want to impose and/or modify any reasonable restrictions in the management of your accounts. At least annually, we contact individual clients to determine whether their financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of accounts managed. We are always reasonably available to consult with individual clients relative to the status of their accounts. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities. Your beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account. A separate account is maintained for each client with the custodian of your choice and clients retain right of ownership of the account (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

It is important that you understand we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions we take for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

See Item 12, Brokerage Practices, for additional discussion on our recommendation and use of MG Trust Co. (MG Trust) and Matrix Settlement and Clearance Services (Matrix), TD Ameritrade Institutional, a Division of TD Ameritrade, Inc. ("TD Ameritrade") or Schwab Advisor Services a division of Charles Schwab and Co. Inc. (Schwab) registered broker/dealers and members of the FINRA and SIPC. For qualified retirement plans (defined benefit, defined contribution and 401(k) plans utilizing mutual funds, index funds and exchange traded funds it is necessary that these assets be maintained in a custodial account with MG Trust and Matrix. We will assist you in establishing a managed account relationship through M G Trust, Matrix, TD Ameritrade, or Schwab, which will maintain custody of your funds and securities. Neither we nor our representatives act as custodian and we do not have access to your funds

and securities except to have advisory fees deducted from your account by the custodian with your prior written authorization and then paid to us.

If you the client desire, we will accept trading authorization of your accounts through a written limited Power of Attorney, and will provide investment management services on a discretionary basis. Under this arrangement, we make all decisions to buy, sell or hold securities, cash or other investments in the designated managed account in our sole discretion without consulting with you before making any transactions. You must provide us with written authorization to exercise this discretionary authority and can place reasonable restrictions and limitations on the authority and portfolio holdings. See **Item 16, Investment Discretion**, for additional discussion on discretionary and non-discretionary authority.

Prior to engaging us to provide investment management services, you are required to enter into a formal investment advisory agreement with us setting forth the terms and conditions, including the amount of investment advisory fees, under which we manage your assets and also separate custodial/clearing agreement with the designated custodian.

M. G. Trust, Matrix, T D Ameritrade and Schwab may or may not charge separately for maintaining custody of your accounts (dependent upon the service relationship involved), although it may charge brokerage commissions and/or transaction fees directly to you. You may be charged additional fees for executing certain transactions including transaction charges, ticket charges or service fee/charges. Your advisor may agree to offset these charges against future advisory fee collection at his or her discretion. The clients receiving a waiver of transaction fees will receive an offset against future advisory fees equal to the amount of transaction fees waived. All fees and charges are noted on your statements and/or confirmations. All transaction fee offset adjustments will be noted on your fee billing statements. The client will remain responsible for any non-transaction related fees charged by the account custodian. The specifics of each transaction fee offset agreement will be disclosed in the client's investment advisory agreement.

**We do not receive any portion of the commission or fees from either the custodian or from you.** In addition, you may incur certain charges imposed by third parties other than us in connection with investments made through your account, including, but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, variable annuity fees and surrender charges and IRA and qualified retirement plan fees. Our management fees are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each security prospectus.

#### ***Fee Schedule Included for Asset Management Services***

Rowe Consulting Group, LLC charges an Asset Management Fee of 1.5% of the assets under management. The Asset Management fee may be negotiable at our sole discretion based upon the amount of assets under management, the composition of the portfolio and possibly to individuals that may be related to the IA Representative. Fees are billed quarterly in arrears and calculated on the value of the account at the end of the quarter. Accounts opened mid-quarter are prorated based on the number of days that services are provided during the first billing period.

Clients are advised that Rowe Consulting Group, LLC might charge a higher percentage than most investment advisers, but Rowe Consulting Group, LLC is in compliance with Section 205 of the Investment Advisers Act of 1940.

***Performance Based Fees Disclosed***

Advisor offers a performance-based management fee for its services in lieu of the asset-based management fee described above. However, the performance-based management fee is only available to the following types of clients, and even then, only after the client fully understands the risks involved in performance-based management:

Clients with at least \$1,000,000 under management with Advisor or more than \$2,000,000 of net worth; Clients who are “qualified purchasers” under section 2(a)(51)(A) of the Investment Company Act of 1940, as amended (the “1940 Act”); or Clients that are private investment companies exempted from the 1940 Act under section 3(c)(7) of the 1940 Act.

Each client that selects the performance-based management fee option will be required under law to complete an Investor Questionnaire, pursuant to which the client shall establish that the client is qualified to pay the performance-based management fee.

The performance-based management fee is determined as follows:

The performance rate is negotiated on a client-by-client basis, but shall not exceed 20% of the net increase in portfolio value.

The client agrees to pay the performance-based management fee either quarterly or monthly, in arrears, for investment advisory services rendered based upon the percentage of period end portfolio valuation (appreciation of the net increase in the total portfolio value, from all sources of appreciation, less any net principle reduction from all sources of portfolio value reduction).

Whether the performance-based management fee will be paid to Advisor monthly or quarterly will be dependent upon the brokerage firm, and or custodian utilized and the agreement between the client and Advisor.

The performance based fee will be assessed in addition to a reduced, quarterly asset based fee,

***Recommendation of Third Party Money Managers:***

Rowe Consulting Group, LLC may act as a solicitor and allow its Advisor Representatives to refer clients to unaffiliated third party investment advisory firms offering asset management and other investment advisory services, under special arrangement for an individual client. As a result, Rowe Consulting Group, LLC is paid a portion of the fee charged and collected by the third party Investment Adviser in the form of solicitor fees or consulting fees. Each solicitation arrangement is performed pursuant to a written solicitation agreement and is in compliance with SEC Rule 206(4)-3 and applicable state securities rules and regulations.

Through this program, Rowe Consulting Group, LLC will assist a client with identifying the client’s risk tolerance and investment objectives. The Rowe Consulting Group, LLC will recommend third party Investment Advisers in relation to the client’s stated investment objectives and risk tolerance. A client may select a recommended third party Investment Adviser firm based upon the client’s needs. Clients will enter into an agreement directly with the unaffiliated third party Investment Adviser who will provide asset management services.

Rowe Consulting Group, LLC will be available to answer questions the client may have regarding their account and act as the communication conduit between the client and the third party Investment Adviser. Third party Investment Advisers may take discretionary authority to determine the securities to be purchased and sold for the client. Rowe Consulting Group, LLC will not have any trading authority with respect to a client's managed account with the third party Investment Adviser(s).

Third party managed programs generally have account minimum requirements that will vary from Investment Adviser to Investment Adviser. Account minimums are generally higher on fixed income accounts than equity based accounts. A complete description of the third party Investment Adviser's services, fee schedules and account minimums will be disclosed in the third party Investment Adviser's Form ADV or similar Disclosure Brochure which will be provided to clients at the time an agreement for services is executed and the account is established. Client reports will depend upon the third party Investment Adviser.

While the actual fee charged to a client will vary depending on the third party investment adviser Rowe Consulting Group, LLC utilized as disclosed in the account agreement executed by you at the time the relationship is established. All fees are calculated and collected by the selected third party Investment Adviser firm who will be responsible for delivering Rowe Consulting Group, LLC' portion of the client fee to Rowe Consulting Group, LLC.

Clients may incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees, surrender charges, and IRA and qualified retirement plan fees. Rowe Consulting Group, LLC will not receive any portion of such commissions or fees. Rowe Consulting Group, LLC is only compensated by the consulting fee as described above. Rowe Consulting Group, LLC receives no other compensation in connection with a client's account.

While Rowe Consulting Group, LLC consistently reviews the performance of numerous third party investment firms, Rowe Consulting Group, LLC will enter into relationships with only a select number of third party Investment Advisers based on the Rowe Consulting Group, LLC' due diligence.

Third party Investment Advisers recommended by the Rowe Consulting Group, LLC must be registered or exempt from registration in the state where the client resides.

Clients are advised that the Rowe Consulting Group, LLC may have a conflict of interest by only offering those third party Investment Advisers that have agreed to pay a portion of their advisory fee to the Rowe Consulting Group, LLC and have met the conditions of the Rowe Consulting Group, LLC due diligence review. Clients are advised that there may be other third party managed programs that may be suitable to the client that may be more or less costly. No guarantees can be made that client's financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

**B. Fees Deducted From Client Accounts**

The fees for our Investment Consulting and Asset Management Services will be deducted directly from your account, where possible. In order to have these fees deducted from your account, you will be required to provide the custodian with written authorization to have the fees deducted and paid to us. At least quarterly, the custodian will send you a statement showing all disbursements from the account, including any advisory fees paid to us from your account.

Either party may terminate services at any time by providing written notice to the other party. If services are terminated within 5 business days of signing the client agreement, they are terminated without penalty. After the initial 5 day period, a 30 day notice is required. During that 30 day period, we will continue to provide services previously begun but will not begin any new services without your specific instruction. Any Asset Management Fees that had been paid in advance but not earned will be refunded to the account within 30 days of the termination of services.

### ***Fees Negotiable***

Advisor retains the right to modify fees, in its sole and absolute discretion, on a Client-by-client basis based upon the size, complexity, time requirements, service requirements and nature of the client investment objectives.

### ***How Often Clients Billed or Fees Deducted***

Annual fees for Asset Management Services are divided and billed quarterly in arrears based on the market value of the account on the last business day of the quarter. The initial fee for new accounts is pro-rated from the time the account is opened.

### **C. Additional Client Fees Charged**

Brokerage, custodial and transaction fees charged by the custodian will be billed directly to the client. In addition, there may be an account set-up fee charged to the client by the custodian. Rowe Consulting Group, LLC will not receive any portion of such brokerage fees and/or expenses from the custodian or client. Clients may also incur certain charges imposed by third parties other than the Rowe Consulting Group, LLC in connection with investments made through the account, including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, variable annuity fees and surrender charges, and IRA and qualified retirement plan fees. Management fees charged by Rowe Consulting Group, LLC are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to clients. A description of these fees and expenses are available in each investment company security's prospectus. See Item 12 of this Disclosure Brochure for more information regarding the firm's brokerage practices. Rowe consulting Group LLC will strive to reduce and or eliminate these expenses as is practical, prudent and reasonable.

### **D. Prepayment of Client Fees Disclosed**

Rowe Consulting Group, LLC does **not** charge fees in advance and therefore does **not** require prepayment of advisory fees.

### ***Client Refund of Pre-Paid Fees***

Again, Rowe Consulting Group, LLC does **not** charge fees in advance and therefore does **not** require pre-payment of advisory fees. As previously stated above, fees are collected in-arrears by Rowe Consulting Group, LLC.

### **E. External Compensation for the Sale of Securities to Clients**

Rowe Consulting Group, LLC and our Investment Advisor Representatives **do not** accept compensation for the sale of securities (i.e. commissions) or other investment products from any broker/dealer or other investment product sponsor. Additionally, we do not accept asset-based sales charges from the sale of mutual funds. The only compensation we receive is directly from the advisory fees charged to our clients described previously in this section.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

For suitable client situations, the Rowe Consulting Group, LLC is willing to utilize a Performance based fee arrangements, for client accounts that qualify and enroll in our Performance Fee Account program. The fee for this strategy will not exceed 20% of the net increase in portfolio value charged quarterly, in arrears.

The performance based fee will be assessed in addition to a reduced, quarterly asset based fee.

As described above in *Item 5 – Fees and Compensation*, Rowe Consulting Group, LLC provides services and is compensated in a way in which it accepts performance fees. That is, fees are based on a share of capital gains or capital appreciation of the assets of a client. Rowe Consulting Group, LLC also provides services and is compensated in the manner in which it accepts asset based fees. That is, fees are adjusted based on the total amount of assets placed under the responsibility of the Rowe Consulting Group LLC., by the client.

### **Potential Conflict of Interests**

Rowe Consulting Group, LLC provides services and is compensated in a way in which it accepts performance fees. That is, fees based on a share of capital gains or capital appreciation of the assets of a client are based upon the total amount of assets owned by the client, and the net appreciation in value of the portfolio. There are conflicts of interest the Rowe Consulting Group, LLC faces by managing these accounts at the same time. For example, the nature of a performance fee poses an opportunity for Rowe Consulting Group, LLC to earn more compensation than under a stand-alone asset based fee. Thus Rowe Consulting Group, LLC may favor performance fee accounts over those accounts where Rowe Consulting Group, LLC receives only an asset based fee. One way Rowe Consulting Group, LLC may favor performance fee accounts is that Rowe Consulting Group, LLC may devote more time and attention to performance fee accounts than to accounts under an asset-based arrangement.

The performance based fee will be assessed in addition to a reduced, quarterly asset based fee.

There are other conflicts associated with performance fees that are not as common under an asset-based fee arrangement. The nature of performance fees can encourage unnecessary speculation with client assets in order to earn or increase the amount of the fee. The result of riskier investments can have a positive effect in that results could equal higher returns when compared to an asset-based account. On the other hand, riskier investments historically have a higher chance of losing value. Also, since in a performance fee arrangement an adviser is compensated based on capital gains and/or capital appreciation, these arrangements could give an investment adviser an incentive to time transactions in a client's account on the basis of fee considerations rather than on what is necessarily in the best interest of the client.

Performance fees can potentially cause an investment adviser to engage in transactions or strategies which will increase the amount of the performance fees, but which may not increase the overall performance of the client's account. For example, an account may lose value during a year and no performance fee will be earned. In the following year, Rowe Consulting Group, LLC may receive a performance fee for simply recouping losses from the previous year. Rowe Consulting Group, LLC has controls in place for this potential conflict of interest by using "high-water marks". A performance fee may also encourage Rowe Consulting Group, LLC to make riskier and more speculative investments. Rowe Consulting Group, LLC does not represent that the amount of the performance fees or the manner of calculating the performance fees is consistent with other performance related fees charged by other

investment advisers under the same or similar circumstances. The performance fees charged by Rowe Consulting Group, LLC may be higher than the performance fees charged by other investment advisers for the same or similar services.

Rowe Consulting Group, LLC has established policies and procedures to address the various conflicts of interest associated with charging a performance fee:

- Rowe Consulting Group, LLC devotes equal time to the management of performance fee accounts and asset based fee accounts as well as utilizing similar investment selection processes based upon each client's investment goals, objectives and risk tolerances.
- Only clients that are able to assume additional risk, and are particularly inclined (and have indicated such interest in performance fee arrangements) are solicited to engage in a performance fee arrangement. Rowe Consulting Group, LLC provides such client's full disclosure of the additional risks associated with a performance fee arrangement.
- Rowe Consulting Group, LLC's managing members will typically manage personal accounts using a similar investment strategy used for clients.
- Rowe Consulting Group, LLC has implemented internal compliance policies and procedures designed to comply with applicable state and federal securities law. Procedures are available to clients upon request.
- The performance based fee will be assessed in addition to a reduced, quarterly asset based fee.

## **Item 7 – Types of Clients**

### **Description of Types of Clients Provided Advice**

Rowe Consulting Group, LLC generally provides investment advice to the following types of clients:

- Pension and profit sharing retirement plans
- 401(k) retirement savings plans
- High-net-worth and Ultra- high- net-worth individual investors, and their families
- Endowments and foundations and other charitable organizations
- Individual investors
- Corporations or business entities other than those listed above

All clients are required to execute an agreement for services in order to establish a client arrangement with the Rowe Consulting Group, LLC and/or the sponsor of third-party money manager platforms.

### **Account Requirements Disclosed (e.g., minimum account size)**

Generally, new separately managed accounts must have at least two million dollars. On occasion, exceptions to such minimums may be granted at the sole discretion of the Advisor. All clients are required to execute an agreement for services prior to commencing any work.

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

### **A. Methods of Analysis and Investment Strategies**

Rowe Consulting Group, LLC employs a proprietary quantitative domestic equity investment rotation methodology that identifies emerging trends in domestic stock performance. Our models are expected to

identify equity market capitalization and equity style rotation. Based upon the output and information; equity allocations will be shifted (tilted) to the emerging out performing style and capitalization and away from declining styles and capitalization. Dependent on the investment parameters for the client portfolios, the allocations may be more or less aggressive in capturing the rotation through higher or lower reallocations among the equity sectors. Investment Rotation methodologies have successfully been used by the founders as the core platform of a very successful investment management consulting practice over the past 15+ years. The methodology has been utilized with mid-market and institutional foundation, endowment and pension portfolios since 1993. As a result of the extensive experience of the principles, we have a strong proven track record for a process that works and provides stronger returns than the typical buy and hold strategies.

Rowe Consulting Group, LLC, or the investment managers or fund managers responsible for the day to day investment of portfolio assets use the following methods of analysis in formulating investment advice:

Charting - The set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends of asset classes and related securities.

Cyclical - Analyzes the investments and asset classes sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins, and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

Fundamental - A method of evaluating a security or asset class by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

Technical - A method of evaluating securities and asset classes by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

The Rowe Consulting Group, LLC uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.



Strategic asset allocation. Calls for establishing target allocations and then periodically and dynamically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a “buy and hold” strategy, rather than an active trading approach. Of course, the strategic asset allocation targets and weightings will change over time as the investment market opportunities and preferences change, or the client’s goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Short term purchases. Investments sold within a year.

Tactical asset allocation. Allows for a range of percentages in each asset class (such as Stocks = 20-70% or large cap value = 25-55%). These are minimum and maximum acceptable percentage ranges that allow the Rowe Consulting Group to take advantage of market conditions within these parameters for our clients. Thus, a form of market timing is possible, since the advisor can move equity assets to the higher end of the range when specific style and cap size equities are expected to outperform versus underperforming out-of-favor (and less attractive) equity styles and cap sizes.

Trading. (In very rare circumstances and driven by unexpected and important market activity) Investments sold within 30 days.

## **B. Investment Strategy and Method of Analysis Material Risks**

Your investment with my firm varies with the success and failure of our investment strategies, research, analysis and determination of investment manager selections, and portfolio securities. If our investment strategies do not produce the expected returns, the value of your investments will decrease.

The risk associated with **Fundamental** analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

## **C. Security Specific Material Risks**

Clients must understand that past performance is not indicative of future results. Therefore, current and prospective clients (including you) should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, my firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities through my investment management program.

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in a an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETFs or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.
- Domestic Equity Style and Capitalization Overweighting - The Equity Investment Rotation (EIR) methodology will develop strategic over and under weightings of domestic equity portfolios based upon equity style (growth and value) and capitalization weightings (large, medium and small), which may or may not conform to market over and under performance.

- Style and Cap Size Adherence- Investment vehicles and/or investment managers may deviate from their stated investment styles (style and cap size adherence), thereby over or under exposing portfolios to higher or lower concentrations in a particular asset class.
- Market and/or Economic Conditions may Temporarily Shift – EIR models may cause portfolios to overweight and/or underweight asset classes contra to prevailing market performance.

## **Item 9 – Disciplinary Information**

Item 9 of the Form ADV Part 2 instructions is not applicable to this Disclosure Brochure because there are no legal or disciplinary events listed at Item 9 of the Form ADV Part 2 instructions that are material to a client's or prospective client's evaluation of our business or integrity.

### **A. Criminal or Civil Actions**

Rowe Consulting Group, LLC and Robert B. Rowe Jr. CIMA have no criminal or civil actions in a domestic, foreign or military court of competent jurisdiction.

### **B. Administrative Enforcement Proceedings**

Rowe Consulting Group, LLC and Robert B. Rowe Jr. CIMA have no administrative enforcement proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

### **C. Self Regulatory Organization Enforcement Proceedings**

Rowe Consulting Group, LLC and Robert B. Rowe Jr. CIMA have no Self-Regulatory Organization proceedings required to be reported.

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

Rowe Consulting Group, LLC is an independent investment advisory firm and only provides investment advisory services. The firm is not engaged in any other business activities and offers no other services than those described in this Disclosure Brochure.

### **A. Broker-Dealer or Representative Registration**

Rowe Consulting Group, LLC is **not** and does **not** have a related company that is a (1) broker/dealer, municipal securities dealer, government securities dealer or broker, (2) investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund), (3) futures commission merchant, commodity pool operator, or commodity trading advisor, (4) banking or thrift institution, (5) accountant or accounting firm, (6) lawyer or law firm, (7) insurance company or agency, (8) pension consultant, (9) real estate broker or dealer, or (10) sponsor or syndicator of limited partnerships, **other than those discussed below.**

## **B. Other Investment Advisory Firm**

**Enhanced Investment Partners LLC; (Enhanced) *Enhanced's initial registration application as an Investment Advisory Firm will be submitted in October 2011*** - provides a proprietary domestic Equity Investment Rotational (EIR) methodology to Mid-Market and Institutional level investment portfolios . These services involve providing clients with continuous oversight and on-going supervision and re-allocation of their domestic equity portfolios.

## **C. Futures or Commodity Registration**

Rowe Consulting Group, LLC is **not** and does **not** have a related company that is a futures commission merchant, commodity pool operator, or a commodity trading advisor. Further, we do not have an application pending for registration as any of the foregoing entities. Robert B. Rowe Jr. CIMA is **not** a representative and does not have any application pending as a representative of a futures commission merchant, commodity pool operator, or a commodity trading advisor.

## **D. Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Rowe Consulting Group, LLC is **not** and does **not** have a related company that is a (1) broker/dealer, municipal securities dealer, government securities dealer or broker, (2) investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), (3) other investment adviser or financial planner, (4) futures commission merchant, commodity pool operator, or commodity trading advisor, (5) banking or thrift institution, (6) accountant or accounting firm, (7) lawyer or law firm, (8) insurance company or agency, (9) pension consultant, (10) real estate broker or dealer, or (11) sponsor or syndicator of limited partnerships, **other than those discussed below**.

## **Other Business Activities of Firm Principal**

**Rowe Decision Analytics II, LLC (RDA)** an on-line investment policy web application service provider that assists investment management consultants, financial advisors, financial planners, and bank trust officers prepare documented investment policy statements detailing investor's investment goals, objectives and policies. Investment policy statements are provided for qualified retirement plans (public and corporate funds, not for profit organizations, individual investors, partnerships, corporations, 401(k) savings plans, trusts and cash management accounts.

**Rowpyn Investment Partners LLC; (Rowpyn)** is a domestic equity investment rotation Equity Investment Rotation (EIR) strategy firm, and the exclusive intellectual property owner and licensor of the Rowpyn Equity Investment Rotation (EIR) Methodology.

## **E. Recommendation or Selection of Other Investment Advisers and Conflicts of Interest**

As described in *Item 4 – Advisory Business* and *Item 5 – Fees and Compensation*, Rowe Consulting Group, LLC has formed relationships with independent, third-party money managers.

Rowe Consulting Group, LLC may recommend individual investor clients to work directly with third-party money managers. In the instance when we refer individual investor clients to a third party money manager, the client should know that our firm will receive a portion of the fee charged by the third party money manager. Therefore, we may have a conflict of interest in that we may only recommend third

party money managers that will agree to compensate our firm by paying us a portion of the fees billed to your account managed by the third party money manager.

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

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

Advisor has adopted a Code of Ethics pursuant to Rule 204A-1 of the **Investment Advisers Act of 1940, as amended**, to prevent violations of federal securities laws. The Code of Ethics is predicated on the principle that Rowe Consulting Group LLC owes a fiduciary duty to its clients. Accordingly, the Rowe Consulting Group LLC expects all employees to act with honesty, integrity and professionalism and to adhere to federal and state securities laws. All officers, directors, partners and employees of Advisor and any other person who provides advice on behalf of Advisor and is subject to Advisor's control and supervision are required to adhere to the Code of Ethics. At all times, Advisor and its employees must (i) place client interests ahead of Advisor's; (ii) engage in personal investing that is in full compliance with the Code of Ethics of Rowe Consulting Group LLC; and (iii) avoid taking advantage of their position. Existing and prospective clients may request a copy of Advisor's Code of Ethics by contacting Robert B. Rowe Jr. CIMA, Manager and Chief Compliance Officer of Advisor, at (312) 913-9872 (office).

Advisor or individuals associated with Advisor may buy, sell, or hold in their personal accounts the same securities that Advisor recommends to its clients and in accordance with Advisor's internal compliance procedures. Such trades will occur simultaneously with or after trades placed on behalf of clients. To minimize conflicts of interest, and to maintain the fiduciary responsibility Advisor has for its clients, Advisor has established the following policy: An officer, director, or employee of Advisor shall not buy or sell securities for a personal portfolio when the decision to purchase is substantially derived, in whole or in part, by reason of employment with Advisor, unless the information is also available to the investing public on reasonable inquiry. No person associated with Advisor shall prefer his or her own interest to that of any client. Personal trades in securities (or derivative securities such as options, convertibles and warrants) being purchased or sold for clients may be affected simultaneously with or after trades are affected for clients. Advisor personnel may not anticipate trades to be placed for clients.

### **B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Rowe Consulting Group, LLC does not buy or sell for client accounts, securities in which Rowe Consulting Group, LLC or Robert B. Rowe Jr. CIMA have a material financial interest. Examples of material financial interests (all of which do **not** apply to our firm) include acting as principal to buy securities from or sell securities to clients; serving as general partner in a partnership solicited to clients; acting as investment adviser to an investment company recommended to clients.

### **C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

You should know that Robert B Rowe Jr. will buy or sell securities that may also be recommended to clients (including you). In order to minimize this conflict of interest, securities that are recommended and purchased for clients are generally widely held and publicly traded.

**D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

In accordance with our fiduciary duty to clients, we always place our client interests ahead of our own investment interests. We will not purchase or sell any security prior to a transaction being implemented for an advisory account, preventing Rowe Consulting Group, LLC from benefiting from client transactions. In some cases, we may invest in the same security as our clients at the same time. In such instances, we will include our accounts in block trades implemented for clients. Please refer to Item 12 – Brokerage Practices for a description of Rowe Consulting Group LLC block trading procedures.

**Item 12 – Brokerage Practices**

Clients are under no obligation to act on the investment consulting and investment recommendations of Rowe Consulting Group, LLC. If the firm assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible.

**A. Factors Used to Select Broker-Dealers for Client Transactions**

Clients wishing to implement the firm's general investment advice are free to select any broker/dealer or investment advisor they wish and are so informed. However, for clients that wish to establish an Investment Management Consulting or Asset Management Services account managed by the Rowe Consulting Group LLC, we may recommend and in some cases require the use of a specific broker/dealer and/or custodian.

There is no direct link between the broker/dealers we recommend and the investment advice Rowe Consulting Group, LLC provides to its clients, although Rowe Consulting Group, LLC receives economic benefits through its participation in the institutional platforms. These benefits include receipt of duplicate client confirmations; access to a trading desk serving Rowe Consulting Group, LLC and other institutional platform participants; Performance Reporting; retirement plan reporting compliant to industry standards; institutional trading capabilities; electronic ID trading capability; daily valuation and reporting to client record keepers and administrators; block trading & execution capabilities; the ability to have advisory fees deducted 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, technology, and practice management products or services provided to Rowe Consulting Group, LLC by third party vendors. These benefits received by Rowe Consulting Group, LLC do not depend on the amount of brokerage transactions directed to a particular broker/dealer.

As part of its fiduciary duties to clients, Rowe Consulting Group, LLC endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of investment practice tools; account information & access; research and economic benefits by Rowe Consulting Group, LLC in and of itself creates a potential conflict of interest.

At least annually, the Rowe Consulting Group LLC will review alternative custodians in the marketplace for comparison to the currently used custodians, evaluating criteria such as overall expertise, cost competitiveness, capabilities versus competitors and industry standards. errors and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations. No single criteria

will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian, and their effectiveness in maintaining our client accounts.

### ***A.3.a - Recommendation of Broker Dealer***

Rowe Consulting Group LLC will recommend and in some cases require the client establish an account at either Matrix Settlement & Clearance Services, M G Trust Company LLC., T D Ameritrade or Schwab Advisor Services as a result of Rowe Consulting Group, LLC's participation in their respective investment advisor institutional platforms.

All of the firms offer to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Rowe Consulting Group, LLC is not affiliated with either firm. The next paragraph describes additional benefits Rowe Consulting Group, LLC is able to receive as a result of its participation in the Matrix Settlement & Clearance Services, M G Trust Company, T D Ameritrade or Schwab Advisor Services institutional platforms.

### ***A.3.b - Client Directed Brokerage***

While Rowe Consulting Group, LLC generally recommends, and in some cases requires, the use of Matrix Settlement & Clearance Services, M G Trust Company LLC., T D Ameritrade or Schwab Advisor Services, a client may be allowed to select a broker/dealer of their own choosing and still participate in Rowe Consulting Group LLC investment consulting services. The decision to use a broker/dealer other than one preferred by Rowe Consulting Group, LLC must be agreed upon by Rowe Consulting Group, LLC and the client. It should be noted that not all investment advisor firms require the use of a particular broker/dealer. Some investment advisors permit their clients to use any broker/dealer the client may want to use. When a client directs the use of a particular broker/dealer or other custodian, Rowe Consulting Group, LLC may not be able to obtain the best level of service for themselves or their clients, prices and execution for the transaction. Clients who direct the use of a particular broker/dealer or custodian may receive less favorable prices than would otherwise be the case if clients had not designated a particular broker/dealer or custodian. Further, clients with directed brokerage arrangements may have trades placed by Rowe Consulting Group, LLC after effecting non-directed trades.

### **B. Aggregating Securities Transactions for Client Accounts**

It is the objective of Rowe Consulting Group, LLC to provide a means of allocating trading and investment opportunities between all advisory clients on a fair and equitable basis and in compliance with all applicable state and federal guidelines. With respect to clients' accounts with powers of attorney with the advisor and substantially similar investment objectives and policies, Rowe Consulting Group, LLC may often seek to purchase or sell a particular security in each account. Rowe Consulting Group, LLC will aggregate orders only when such aggregation is consistent with Advisor's duty to seek best execution and is consistent with the investment objective of each client. No client account will be unfairly favored over any other account. Each client that participates in an aggregated order will participate based on the average execution price in that particular security. All transaction costs will be allocated pro rata based on each client's participation in the transaction. All securities purchased or sold, whether the order is filled completely or partially, will then be allocated pro rata based on the assets of each account.

### **Handling of Trade Errors**

Rowe Consulting Group, LLC has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of Rowe Consulting Group, LLC to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting

from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client will be made whole and any loss resulting from the trade error will be absorbed by Rowe Consulting Group, LLC if the error was caused by the firm. If the error is caused by the broker-dealer, the broker-dealer will be responsible for covering all trade error costs. If an investment gain results from the correcting trade, the gain will remain in the client's account unless the same error involved other client account(s) that should also receive the gains and it is not permissible for all clients to retain the gain. Rowe Consulting Group, LLC may confer with clients to determine if the client should forego the gain (e.g., due to tax reasons).

Rowe Consulting Group, LLC will never benefit or profit from trade errors.

### **Item 13 – Review of Accounts**

#### **A. Schedule for Periodic Review of Client Accounts and Advisory Persons Involved**

Each account will be reviewed by Robert B. Rowe Jr. CIMA, Manager and Chief Compliance Officer of Advisor, as contracted for with the client at the inception of the advisory relationship. Accounts are reviewed in the context of each client's stated investment objectives and guidelines, ensuring that the structure of the portfolio is coordinated with these objectives, at least quarterly.

#### **B. Review of Client Accounts on Non-Periodic Basis**

More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the investment market, political or economic environment. Examples of circumstances indicating such a review would be significant market volatility (up or down), significant changes of Federal Reserve policy, economic disruption, and global events. Such reviews and reports will be issued on an ad hoc and infrequent schedule, dependent upon prevailing circumstances.

#### **C. Content of Client Provided Reports and Frequency**

Clients will receive monthly statements directly from the custodian. Confirmation statements will be issued by the custodian for all trading activity, unless the client directs otherwise.

#### ***Reports are Written***

Client account statements prepared by the broker/dealer are in written format.

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

#### **A. Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest**

The only form of compensation received for advisory services is the fees charged for providing investment advisory services (as described in Item 5 of this brochure). The firm receives other benefits and non-economic benefits for dealing with Matrix Settlement & Clearance Services, M G Trust Company LLC., T D Ameritrade and Charles Schwab (as described in Item 12 of this brochure).



### ***Advisory Firm Payments for Client Referrals***

From time to time, Rowe Consulting Group LLC may retain solicitors to refer clients to Advisor. If a client is introduced to Rowe Consulting Group LLC by either an unaffiliated or an affiliated solicitor, Advisor may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from Advisor's management fee, and shall not result in any additional charge to the client. If the client is introduced to Advisor by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of Advisor's written disclosure statement as same is set forth in this Disclosure Brochure, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between Advisor and the solicitor, including the compensation to be received by the solicitor from Advisor. Any affiliated solicitor of Advisor shall disclose the nature of his/her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of Advisor's written disclosure statement as same is set forth in this Disclosure Brochure.

### ***Economic Benefits***

Advisor may recommend that clients establish brokerage accounts with certain registered broker-dealers to maintain custody of clients' assets and to effect securities transactions for their accounts. While Advisor is not affiliated with these broker dealers, they may provide Advisor with access to its institutional trading and operations services, which are typically not available to retail investors. These services may include research, brokerage, custody, and access to mutual funds, ETF's and other investment securities that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

These broker-dealers may also provide access to Advisor of other investment products and investment services that benefit Advisor and our clients but may not necessarily benefit equally, each clients' accounts. Some of these other investment products and investment services are expected to assist Advisor in managing and administering client' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of Advisor's fees from its clients' accounts, and assist with back-office support, record keeping and client performance reporting. Many of these services generally may be used to service all or a substantial number of Advisor's client accounts, including accounts not maintained at the specific broker/dealer that is offering this particular service. These broker-dealers also provide Advisor with other services intended to help Advisor manage and further develop its business enterprise. These services may include consulting, publications, conferences and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, these broker-dealers may make available, arrange and/or pay for these types of services to Advisor by independent third parties. These broker-dealers may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Advisor. While Advisor serves as a fiduciary and endeavors to act in its clients' best interests, Advisor's recommendation that clients maintain their assets in accounts with these broker-dealers may be based in part on the benefit and marketing support to Advisor of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by these broker-dealers which may create a potential for or perception of conflicts of interest. It is important to note that Advisor will not receive any compensation for any securities transactions conducted in any client custodial or brokerage accounts.

## Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented.

Rowe Consulting Group, LLC is deemed to have custody of client funds and securities whenever Rowe Consulting Group, LLC is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Rowe Consulting Group, LLC will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Rowe Consulting Group, LLC is deemed to have custody, the firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Rowe Consulting Group LLC. When clients have questions about their account statements, they should contact Rowe Consulting Group, LLC or the qualified custodian preparing the statement.

When fees are deducted from an account, Rowe Consulting Group, LLC is responsible for calculating the fee and delivering instructions to the custodian. At the same time Rowe Consulting Group, LLC instructs the custodian to deduct fees from the client's account; Rowe Consulting Group, LLC will send the client an invoice itemizing the fee. Itemization shall include the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

### ***Custodian will Send Reports***

Account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly.

Clients should carefully review any correspondence received from Rowe Consulting Group LLC and are urged to compare the correspondence against reports and/or statement received from the account custodian. When clients have questions about their account statements, they should contact Rowe Consulting Group LLC or the qualified custodian preparing the statement.

## Item 16 – Investment Discretion

Through its asset management services and upon receiving written authorization from a client, Rowe Consulting Group, LLC will maintain trading authorization over client accounts. Upon receiving written authorization from the client, Rowe Consulting Group, LLC may implement trades on a **discretionary** basis. When discretionary authority is granted, Rowe Consulting Group, LLC will have the authority to determine the type of securities, the amount of securities that can be bought or sold, the broker or dealer to be used, and the commission rates paid for the client's portfolio without obtaining the client's consent for each transaction. However, it is the policy of Rowe Consulting Group, LLC to consult with the client

prior to making significant changes in the account even when discretionary trading authority is granted by the client.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, Rowe Consulting Group, LLC will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if you are not able to be reached or are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

All clients have the ability to place reasonable restrictions on the types of investments that may be purchased in an account. Clients may also place reasonable limitations on the discretionary power granted to our firm so long as the limitations are specifically set forth or included as an attachment to the client agreement.

## **Item 17 – Voting Client Securities**

### **A. Describe Whether Clients Can Direct The Adviser How to Vote/Describe Policy**

Rowe Consulting Group, LLC will not vote proxies on behalf of your account therefore you cannot direct Rowe Consulting Group LLC to vote proxies on your behalf. While there are some investment advisors that will vote proxies and other corporate decisions on behalf of their clients, we have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to clients to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility of you the client, or the custodian, or investment manager to vote all proxies for securities held in accounts managed by Rowe Consulting Group.

Clients will receive proxies directly from their custodian or transfer agent and such documents will not be delivered by the advisor. Although we do not vote client proxies, if you have a question about a particular proxy feel free to contact us.

### ***Clients May Obtain Copy of Adviser Voting Policies***

If you would like to view our internal compliance policy describing the fact that the firm does not **vote** proxies on your behalf, please contact us.

## **Item 18 – Financial Information**

This item is not applicable to this brochure. Rowe Consulting Group LLC does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

### **A. Balance Sheet**

Rowe Consulting Group, LLC is not required to include a balance sheet for its most recent fiscal year.

### **B. Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

Rowe Consulting Group, LLC is not subject to a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

### **C. Bankruptcy Petition During the Past Ten Years**

Finally, Rowe Consulting Group, LLC has not been the subject of a bankruptcy petition at any time.

## **Item 19 – Requirements for State-Registered Advisers**

### **A. Educational Background and Business Experience**

Robert B. Rowe, Born 6-11-1949

#### **Formal Education after High School**

- Lincoln College, certificate. 1970
- Illinois State University, with a Bachelor of Science in business administration – 1972

#### **Industry Designations**

- Certified Investment Management Analyst (CIMA)<sup>1</sup> -1987
- Retirement Mastery Consultant (RMC)<sup>2</sup> – 2010
- Who's Who in Investment Management Consulting- 1999

#### **Business Background**

- Rowe Consulting Group, LLC - Managing Member, 2/2011 to Present
- Enhanced Investment Partners, Inc. - Managing Member, 2003 - Present
- AZA Capital Management, Investment Advisor Representative 03/2011 to 08/2011
- Rowe Decision Analytics II, LLC - Managing Member, 2/1998 to Present
- Raymond James and Associates, Senior Vice President - investments, Senior Investment Consultant, 05/2005 to 02/2011
- Morgan Stanley, Senior Vice President-Investments, Senior Investment Management Consultant, 03/1998 to 06/2005
- Prudential Securities, Senior Vice President-Investments, Senior Investment Management Consultant, 3/1990 to 3/1998

### **B. Disciplinary Information**

As previously stated in Item 9 of this Disclosure Brochure, I, Robert B Rowe Jr. CIMA have never been subject to a legal or disciplinary event.

### **C. Other Business Activities**

**Rowe Decision Analytics II, LLC (RDA)** an on-line investment policy web application service provider that assists investment management consultants, financial advisors, financial planners, and bank trust officers prepare documented investment policy statements detailing investor's investment goals, objectives and policies. Investment policy statements are provided for qualified retirement plans (public and corporate funds, not for profit organizations, individual investors, partnerships, corporations, 401(k) savings plans, trusts and cash management accounts.

**Rowpyn Investment Partners LLC; (Rowpyn)** is a domestic equity investment rotation Equity Investment Rotation (EIR) strategy firm, and the exclusive intellectual property owner and licensor of the Rowpyn Equity Investment Rotation (EIR) Methodology.

**Enhanced Investment Partners LLC; (Enhanced)** *Enhanced's initial registration application as an Investment Advisory Firm will be submitted in October 2011* - provides a proprietary domestic Equity Investment Rotational (EIR) methodology to Mid-Market and Institutional level investment portfolios . These services involve providing clients with continuous oversight and on-going supervision and re-allocation of their domestic equity portfolios.

#### ***Performance Based Fees***

As previously disclosed in Item 6, Rowe Consulting Group, LLC charges a Performance based fee on client account that enroll in our Performance Fee Account program. The fee for this strategy will include a 20% of the gain achieved in each client account in excess of a previously agreed upon benchmark charged quarterly, in arrears.

As described above in *Item 5 – Fees and Compensation*, Rowe Consulting Group, LLC provides services and is compensated in a way in which it accepts performance fees. That is, fees based on a share of capital gains and/or capital appreciation of the assets of a client. Rowe Consulting Group, LLC also provides services and is compensated in a way in which it accepts asset based fees. That is, fees based on the total amount of assets owned by the client.

#### ***Potential Conflict of Interests***

Rowe Consulting Group, LLC provides services and is compensated in a way in which it accepts performance fees. That is, fees based on a share of capital gains or capital appreciation of the assets of a client, which are adjusted to the total amount of assets owned by the client and entrusted to Rowe Consulting Group. There are conflicts of interest Rowe Consulting Group, LLC faces by managing these accounts at the same time. For example, the nature of a performance fee poses an opportunity for Rowe Consulting Group, LLC to earn more compensation than under a stand-alone asset based fee. Thus Rowe Consulting Group, LLC may favor performance fee accounts over those accounts where Rowe Consulting Group, LLC receives only an asset based fee. One way Rowe Consulting Group, LLC may favor performance fee accounts is that Rowe Consulting Group, LLC may devote more time and attention to performance fee accounts than to accounts under an asset-based arrangement.

There are other conflicts associated with performance fees that are not as common under an asset-based fee arrangement. The nature of performance fees can encourage unnecessary speculation with client assets in order to earn or increase the amount of the fee. The result of riskier investments can have a positive effect in that results could equal higher returns when compared to an asset-based account. On

the other hand, riskier investments historically have a higher chance of losing value. Also, since in a performance fee arrangement an adviser is compensated based on capital gains or capital appreciation, these arrangements could give an investment adviser an incentive to time transactions in a client's account on the basis of fee considerations rather than on what is necessarily in the best interest of the client.

Performance fees can potentially cause an investment adviser to engage in transactions or strategies which will increase the amount of the performance fees, but which may not increase the overall performance of the client's account. For example, an account may lose value during a year and no performance fee will be earned. In the following year, Rowe Consulting Group, LLC may receive a performance fee for simply recouping losses from the previous year. Rowe Consulting Group, LLC controls for this potential conflict of interest by using a high-water mark. A performance fee may also encourage Rowe Consulting Group, LLC to make riskier and more speculative investments. Rowe Consulting Group, LLC does not represent that the amount of the performance fees or the manner of calculating the performance fees is consistent with other performance related fees charged by other investment advisers under the same or similar circumstances. The performance fees charged by Rowe Consulting Group, LLC may be higher than the performance fees charged by other investment advisers for the same or similar services.

Rowe Consulting Group, LLC has established policies and procedures to address the various conflicts of interest associated with charging a performance fee:

- Rowe Consulting Group, LLC devotes equal time to the management of performance fee accounts and asset based accounts.
- Only clients that are able to assume additional risk are solicited to engage in a performance fee arrangement. Rowe Consulting Group, LLC provides such client's full disclosure of the additional risks associated with a performance fee arrangement.
- Rowe Consulting Group, LLC's managing members will typically manage personal accounts using a similar investment strategy used for clients.
- Rowe Consulting Group, LLC has implemented internal compliance policies and procedures designed to comply with applicable state and federal securities law. Procedures are available to clients upon request.

#### **D. Additional Compensation**

Please refer to Item 10 and Item 14 of this Disclosure Brochure for a description of the additional compensation earned.

#### **E. Supervision**

Robert B Rowe Jr. CIMA is the sole owner of Rowe Consulting Group LLC (an investment advisor firm) and ultimately responsible for all activities and services provided by the firm.

#### **F. Requirements for State-Registered Advisers**

I have not been the subject of any client arbitrations or similar legal disputes.

I have not been the subject of a bankruptcy proceeding.

<sup>1</sup> *The CIMA certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB (Association to Advance Collegiate Schools of Business) accredited university business school, and pass an online Certification Examination. CIMA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA). Further, Robert Rowe has taught the session courses at Wharton on Investment Policy Statements and Asset Allocation. Robert Rowe is a member in good standing with IMCA.*

<sup>2</sup> *The Retire Mastery Consultant (RMC) Certificate program is sponsored by Matrix Financial Solutions, a Broadridge Financial Solutions Company is designed for financial advisors, retirement plan consultants and retirement plan specialists who are engaged in designing and delivering comprehensive retirement plan solutions—from investment selection to administrative servicing options. To earn the RMC Certificate candidates must complete 15-credit hours of study including, Introduction to Open Architecture - 2 credits, On-Line Education – 4 credits, RMC Institute – 9 credits (onsite educational workshop offered twice a year), and successfully complete a proficiency exam. Retire Mastery Consultant (RMC) Certificate holders must complete five hours of continuing education each year. Credits toward these continuing education requirements will be awarded for a variety of activities including completing online training programs and articles (plus a brief examination), attending selected sessions at the annual Matrix Get Connected conference, and attending selected training programs and conferences offered by other industry organizations.*

## **Customer Privacy Policy**

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to non-affiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Rowe Consulting Group, LLC does not share or disclose customer information to non-affiliated third parties except as permitted or required by law.

Rowe Consulting Group, LLC is committed to safeguarding the confidential information of its clients. Rowe Consulting Group, LLC holds all personal information provided by clients in the strictest confidence and it is the objective of Rowe Consulting Group, LLC to protect the privacy of all clients. Except as permitted or required by law, Rowe Consulting Group, LLC does not share confidential information about clients with non-affiliated parties. In the event that there were to be a change in this policy, Rowe Consulting Group, LLC will provide clients with written notice and clients will be provided an opportunity to direct Rowe Consulting Group, LLC as to whether such disclosure is permissible.

To conduct regular business, Rowe Consulting Group, LLC may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to Rowe Consulting Group, LLC
- Information about the client's transactions implemented by Rowe Consulting Group, LLC or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service and provide related services for client accounts, it is necessary for Rowe Consulting Group, LLC to provide access to customer information within the firm and to non-affiliated companies, (optional to include examples of outside firms), with whom Rowe Consulting Group, LLC has entered into agreements. To provide the utmost service, Rowe Consulting Group, LLC may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on Rowe Consulting Group, LLC's behalf.

- Information Rowe Consulting Group, LLC receives from the client on applications (name, Social Security number, address, assets, etc.)
- Information about the client's transactions with Rowe Consulting Group, LLC or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Rowe Consulting Group, LLC

Since Rowe Consulting Group, LLC shares non-public information solely to service client accounts, Rowe Consulting Group, LLC does not disclose any non-public personal information about Rowe Consulting Group, LLC's customers or former customers to anyone, except as permitted by law. However, Rowe Consulting Group, LLC may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that Rowe Consulting Group, LLC has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, Rowe Consulting Group, LLC will allow its clients the opportunity to opt out of such disclosure.



## **Information Required by Part 2B of Form ADV: *Brochure Supplement – Richard B. Rowe***

The following are responses to each item found in the Form ADV Part 2B instructions.

### **Item 1 – Cover Page**

All information required in the Form ADV Part 2B instructions can be found on the cover page of this Disclosure Brochure.

### **Item 2 – Educational Background and Business Experience**

Please see Item 19 of this Disclosure Brochure for my education and business experience background.

### **Item 3 – Disciplinary Information**

As previously stated in Item 9 of this Disclosure Brochure, I have never been subject to a legal or disciplinary event.

### **Item 4 – Other Business Activities**

Please see Item 10 and Item 19 of this Disclosure Brochure for details regarding my other business activities.

### **Item 5 – Additional Compensation**

Other than the fees detailed in Item 5 of this Disclosure Brochure, Rowe Consulting Group LLC receive no other compensation related to advisory services provided to clients.

### **Item 6 – Supervision**

I am the sole owner of my investment advisor firm and ultimately responsible for all activities and services provided by my firm.

### **Item 7 – Requirements for State-Registered Advisers – Legal and Financial Disclosure**

Robert B. Rowe Jr. CIMA has not been the subject of any client arbitrations, similar legal disputes or any bankruptcy filings.