

Premier College Funding Disclosure Brochure

May 23, 2016

Premier College Funding

This brochure provides information about the qualifications and business practices of Insight Private Advisors, LLC a registered investment adviser dba Premier College Funding, (hereinafter "Premier College Funding "or the "Firm"). If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed below. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about the Firm is available on the website www.adviserinfo.sec.gov. Insight Private Advisors, LLC is an SEC registered investment adviser. Registration does not imply any level of skill or training.

745 Route 202/206, Suite 305, Bridgewater, New Jersey 08807 | (908) 788-3799

Item 2. Material Changes

In this Item, Premier College Funding is required to discuss any material changes that have been made to the brochure since the last amendment dated March 16, 2016. Premier College Funding has the following material changes to disclose:

1. Items 5 and 12 to eliminate IPA's relationship with LPL Financial;

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Item 4. Advisory Business

Premier College Funding's mission is to help families of college-bound students better afford a college education and contribute their fair share of college costs without sacrificing retirement or life savings. This typically entails financial planning and consulting services. Prior to the rendering any of the foregoing services, clients are required to enter into one or more written agreements with Premier College Funding setting forth the relevant terms and conditions of the relationship (the "*Agreement*").

The Firm, in its current iteration, has been an independent registered investment adviser since October 2013 and is principally owned by Robert Bacino. As of May 17, 2016, Insight Private Advisors, LLC had \$251,317,520 of assets under management. \$249,154,024 of these assets is managed on a discretionary basis, and \$2,162,496 of these assets is managed on a non-discretionary basis. None of these assets are attributable to the services rendered under Premier College Funding.

While this brochure generally describes the business of Premier College Funding, certain sections also discuss the activities of its *Supervised Persons*, which refer to the Firm's officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on Premier College Funding's behalf and is subject to the Firm's supervision or control.

College Funding Consulting Services

Premier College Funding offers clients a range of planning and consulting services, which may include any or all of the following functions:

- Complete FAFSA (Free Application for Federal Student Aid)/CSS (College Scholarship Service) Profile
- Complete any additional financial aid forms required by the individual schools
- Complete College Board IDOC (Intermediate Document)
- Calculate your Expected Family Contribution (EFC)
- Advice and counsel on Stafford Loan applications
- Use of our own internal proprietary databases
- Analyze client's current financial situation
- Provide a complete financial overview of college, cash flow, and retirement and develop a plan to improve each area
- Provide strategies that legally protect your savings and retirement accounts from the financial aid formulas
- Review financial aid forms to help avoid being overlooked for grants, scholarships or loans
- Provide cost and aid information for an unlimited number of schools and recommend additional schools for consideration
- Review up to 3 award letters and evaluate the fairness of the award
- Provide "tested" appeal letters for unfair, under awards
- Complete Lifestyle and Retirement impact analysis

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In performing these services, Premier College Funding is not required to verify any information received from the client or from the client's other authorized parties (e.g., attorney, accountant, etc.) and it expressly relies on such information received from the client.

Premier College Funding may recommend the services of itself or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if clients engage Premier College Funding or Insight Private Advisors, LLC to provide additional fee-based services. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by Premier College Funding under a planning or consulting engagement or to engage the services of any such recommended professionals. Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or objectives for the purpose of reviewing, evaluating or revising Premier College Funding's previous recommendations and/or services.

Item 5. Fees and Compensation

Premier College Funding offers its services on a fixed fee basis. Additionally, certain of Premier College Funding's *Supervised Persons*, in their individual capacities, may offer securities brokerage services and insurance products under a separate commission arrangement.

Planning and Consulting Fees

Premier College Funding provides three package options that range from \$695 to \$1,295 to \$1,895 in the initial year and an additional \$295 each additional year that there is an undergraduate student enrolled. This fee covers any number of students. Regardless of which package is chosen, the fee is paid only once, without regard to what year the student is currently enrolled in High School. As such, the services will be available to the client until June 30th of the student's fresh whichever is longer.

The fee is not negotiable.

Fee Discretion

Premier College Funding, in its sole discretion, may negotiate to charge a lesser fee based upon certain criteria, such as related accounts, pre-existing client relationship, account retention and *pro bono* activities.

Additional Fees and Expenses

In addition to the fees paid to Premier College Funding, clients may also incur certain additional charges imposed by other third parties, such as filing or registration fees.

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

Premier College Funding does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

Item 7. Types of Clients

Premier College Funding provides its services to families of high school students who are planning to attend a higher education institution such as college or university and who are seeking advice on how to obtain funding for associated expenses such as tuition.

Premier College Funding is focused –on “late-stage” college financial planning and its market is primarily parents of sophomores, juniors and seniors in high school. The Firm services families at all income levels; however, most of the client base is in the middle-to-upper income ranges. Most of the clients have been able to save something toward their child’s college covered educational associated costs and expenses.

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

Premier College Funding does not utilize investment strategies under a planning and consulting engagement. For more information related to the methods of analysis, investment strategies and risks of loss associated with Insight Private Advisors, LLC, please consult the Disclosure Brochure for Insight Private Advisors, LLC.

Item 9. Disciplinary Information

Premier College Funding has not been involved in any legal or disciplinary events that are material to a client’s evaluation of its advisory business or the integrity of its management.

Item 10. Other Financial Industry Activities and Affiliations

Insight Private Advisors, LLC

Premier College Funding is a dba of Insight Private Advisors, LLC. Certain *Supervised Persons* of Insight Private Advisors, LLC also serve in the same or similar capacity for Premier College Funding. A conflict of interest exists to the extent that Premier College Funding recommends the services of Insight Private Advisors, LLC where Premier College Funding’s *Supervised Persons* receive additional compensation.

Registered Representatives of Broker Dealer

Certain of the Firm’s *Supervised Persons* are registered representatives of *Purshe Kaplan Sterling Investments (“PKS”)* and may provide clients with securities brokerage services under a separate commission-based arrangement. This arrangement is described at length in Item 5.

Receipt of Insurance Commission

Certain of Premier College Funding’s *Supervised Persons*, in their individual capacities, are also licensed insurance agents. When appropriate, these *Supervised Persons*, in their individual capacities, may recommend the purchase of certain insurance products to advisory clients on a fully-disclosed commission basis. A conflict of interest exists to the extent that Premier College Funding recommends the purchase of insurance products where its *Supervised Persons* receive

insurance commissions or other additional compensation. As a result, Premier College Funding has procedures in place to ensure that any recommendations made by such Supervised Persons are in the best interest of its clients.

Item 11. Code of Ethics

Premier College Funding has adopted a code of ethics in compliance with applicable securities laws (“*Code of Ethics*”) that sets forth the standards of conduct expected of its *Supervised Persons*. Premier College Funding’s *Code of Ethics* contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its *Supervised Persons* and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The *Code of Ethics* also requires certain of Premier College Funding’s personnel (“*Access Persons*”) to report their personal securities holdings and transactions and obtain pre-approval of certain investments (e.g., initial public offerings, limited offerings). However, Premier College Funding *Supervised Persons* are permitted to buy or sell securities that it also recommends to clients if done in a manner consistent with the Firm’s policies and procedures. This *Code of Ethics* has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by *Access Persons* to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated below.

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

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

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

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

Item 12. Brokerage Practices

Premier College Funding does not recommend brokerage or clearing services of any particular financial institution. Insight Private Advisors generally recommends that clients utilize the

brokerage and clearing services of PKS for investment management accounts. For more information related to the brokerage practices of Insight Private Advisors, please consult the Disclosure Brochure of Insight Private Advisors.

Software and Support Provided by Financial Institutions

IPA may receive from *PKS or Charles Schwab and Co, Inc. ("Schwab")*, a registered broker dealer and custodian which is independently owned and operated from IPA, without cost to IPA, computer software and related systems support, which allow IPA to better monitor client accounts maintained at *PKS or Schwab*. IPA may receive the software and related support without cost because IPA renders investment management services to clients that maintain assets at *PKS and Schwab*. The software and support is not provided in connection with securities transactions of clients (i.e., not "soft dollars"). The software and related systems support may benefit IPA, but not its clients directly. In fulfilling its duties to its clients, IPA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that IPA's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence IPA's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support or services.

Item 13. Review of Accounts

Reports

Based on the package chosen, Clients may be provided with reports from Premier College Funding summarizing its analysis and conclusions as requested by the client or as otherwise agreed to in writing by Premier College Funding.

Item 14. Client Referrals and Other Compensation

Premier College Funding is required to disclose any direct or indirect compensation that it provides for client referrals. Premier College Funding does not provide direct or indirect compensation for client referrals.

Item 15. Custody

Premier College Funding is not deemed to have custody of client accounts for any reason.

Item 16. Investment Discretion

Premier College Funding is required to disclose if it accepts discretionary authority to manage securities accounts on behalf of clients. Premier College Funding is considered to exercise

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investment discretion over a client's account if it can effect transactions for the client without first having consent. Premier College Funding does not exercise discretion on behalf of clients.

Item 17. Voting Client Securities

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

Item 18. Financial Information

Premier College Funding is not required to disclose any financial information pursuant to this Item due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and

The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.