

FORM ADV PART 2A**ITEM 1: COVER PAGE**

Name of Investment Firm: New Horizon Financial Strategies, LLC

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This brochure provides information about the qualifications and business practices of New Horizon Financial Strategies, LLC (NHFS). If you have any questions about the contents of this brochure, please contact NHFS at (607) 275-1275. 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.

The designation "registered investment adviser" does not imply a certain level of skill or training.

ITEM 2: MATERIAL CHANGES

Since the last annual filing of this Form ADV Part 2A, dated February 6, 2020, the following material change has occurred:

Effective 04/01/2020, New Horizon Financial Strategies, LLC is registered as an Investment Adviser with the U. S. Securities and Exchange Commission.

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ITEM 4: ADVISORY BUSINESS

New Horizon Financial Strategies, LLC (NHFS) offers initial and ongoing financial services, under separate agreements, which may include full service financial planning, limited financial planning, investment advisory services, investment advice involving securities, and investment advice not involving securities, all through consultations with clients. NHFS has been in business since 1/1/1996 and the principal owners are Paul Strebel and Angela O'Neill.

Subscription Service Financial Planning Services

NHFS will provide on-going financial advice to the Client as long as the subscription is current. The financial advice provided will take into consideration the Client's financial goals, objectives, and current situation. NHFS will provide to the Client specific recommendations which may include, but will not be limited to some or all of the following: tax planning, risk management, investments, insurance, debt management, educational funding, retirement planning, employee benefits, estate planning, corporate or business coordination with personal situation, cash flow analysis, financing options, and charitable donations. The fee paid for this service will be a fixed monthly amount and detailed in Item 5: Fees and Commission. Under rare circumstances, this fee may be negotiated at the discretion of the advisor.

Full Service Financial Planning Services

NHFS provides full service, coordinated financial planning services to evaluate securities, taxes, estate planning, insurance, business planning, retirement planning, personal investments, financing options, cash flow, company benefits, and other financial aspects of a client's situation. A written financial plan report is presented to the client to show their current situation, their goals and objectives, as well as various alternatives to show the client how to reach their goals. The fee paid for the plan is based upon the client's current income and net worth as detailed in Item 5: Fees and Commission. Under rare circumstances, this fee may be negotiated at the discretion of the advisor.

Investment Advisory Services

NHFS offers investment advisory services entailing the management and monitoring of investment portfolios on a non-discretionary basis for its clients through TD Ameritrade Institutional, Great West and Mid-Atlantic, and on a discretionary basis for its clients through TD Ameritrade Institutional, as well as recommend unaffiliated investment managers AssetMark and Focus Point. NHFS offers advice on various securities: equity securities; warrants; corporate debt securities other than commercial paper; commercial paper; certificates of deposit; municipal securities; investment company securities; United States government securities; options contracts on securities and commodities; futures contracts on tangibles and intangibles; interests in partnerships investing in real estate, oil and gas interests, leasing, mortgages, agriculture, and various other types of businesses. Investments owned by the client such as REITs, 529 plans, ETFs, and tax credit partnerships may also be included in the financial planning advice provided by NHFS.

Clients may impose restrictions on investing in certain securities or types of securities, depending upon the investment manager. For example, clients may complete a Social Policy Questionnaire to indicate socially responsible investment strategies the client prefers, as well as specific companies, industries, or asset classes that the client would like targeted or avoided for their investment. See Item 5: Fees and Commission for additional fee information. NHFS assists the client in selecting appropriate investment

objectives and asset allocation plans based on their individual needs and financial circumstances. NHFS monitors the portfolio to help achieve the agreed upon objective.

NHFS offers investment strategies through the AssetMark Platform asset allocation system. For more information regarding the AssetMark Platform, refer to Appendix 1, AssetMark Platform Disclosure Brochure, Item 4. The minimum investment required in the AssetMark is generally \$25,000 to \$50,000 for Mutual Fund accounts, \$100,000 for ETF Accounts; between \$50,000 and \$100,000 for Unified Managed Accounts, depending on the investment strategy selected for the account, and \$100,000 for Privately Managed Portfolios and Unified Managed Accounts, as described in more detail in Appendix 1 of the AssetMark Platform Disclosure Brochure. Accounts below the stated minimums may be accepted on an individual basis at the discretion of the Platform Sponsor. In addition, NHFS uses the advisor as strategist capability through the AssetMark platform. These accounts are non-discretionary, and this service is available to other RIA's.

NHFS offers investment strategies through the NHFS TD Ameritrade Institutional Private Client Model Program. NHFS rebalances these accounts as needed using asset allocation models and in accordance with client's risk tolerance. NHFS does exercise limited investment discretion, through Limited Power of Attorney, to exact trades as directed by the client, verbal or written. The execution of Limited Power of Attorney is established when a client acknowledges discretion by signing their initials on the new account application.

Mid-Atlantic and Great West are the custodians for the pension and profit-sharing programs that NHFS advises. See Item 5: Fees and Commission for additional fee information. NHFS assists the employees of the client in selecting appropriate investment objectives and asset allocation plans based on their individual needs and financial circumstances. NHFS monitors the portfolio on an annual basis to help achieve the agreed upon objective.

Retirement Plan Services - NHFS offers retirement plan services to retirement plan sponsors and to individual participants in retirement plans. For a corporate sponsor of a retirement plan, our retirement plan services can include, but are not limited to, the following services:

Fiduciary Consulting Services

NHFS provides the following Fiduciary Retirement Plan Consulting Services:

- **Investment Policy Statement Preparation.** NHFS will help develop an investment policy statement. The investment policy statement establishes the investment policies and objectives for the Plan. The Plan Sponsor (client) will have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the investment policy statement.
- **Investment Selection Services.** NHFS will provide the client with recommendations of investment options consistent with ERISA section 404(c).
- **Investment Due Diligence Review.** NHFS will provide the client with periodic due diligence reviews of the Plan's reports, investment options and recommendations.
- **Investment Monitoring.** NHFS will assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformation to the guidelines set forth in the investment policy statement and NHFS will make recommendations to maintain or remove and replace investment options.
- **Default Investment Alternative Advice.** NHFS will provide the client with nondiscretionary investment advice to assist them with the development of qualified default investment alternative(s) ("QDIA"), as defined in DOL Reg. Section 2550.404c-5(e)(4)(i), for participants

who are automatically enrolled in the Plan or who otherwise fail to make an investment election. The client will retain the sole responsibility to provide all notices to participants required under ERISA section 404(c)(5).

- Individualized Participant Advice. Upon request, NHFS will provide one-on-one advice to Plan participants regarding their individual situations.

For Fiduciary Consulting Services, all recommendations of investment options and portfolios will be submitted to the client for their ultimate approval or rejection. For retirement plan Fiduciary Consulting Services, the retirement plan sponsor client or the plan participant who elects to implement any recommendations made by us is solely responsible for implementing all transactions. Fiduciary Consulting Services are not management services, and NHFS does not serve as administrator or trustee of the plan. NHFS does not act as custodian for any client account or have access to client funds or securities (with the exception of, some accounts, having written authorization from the client to deduct our fees).

NHFS acknowledges that in performing the Fiduciary Consulting Services listed above that it is acting as a “fiduciary” as such term is defined under Section 3(21)(A)(ii) of Employee Retirement Income Security Act of 1974 (“ERISA”) for purposes of providing non-discretionary investment advice only. NHFS will act in a manner consistent with the requirements of a fiduciary under ERISA if, based upon the facts and circumstances, such services cause NHFS to be a fiduciary as a matter of law. However, in providing the Fiduciary Consulting Services, NHFS (a) has no responsibility and will not (i) exercise any discretionary authority or discretionary control respecting management of Client’s retirement plan, (ii) exercise any authority or control respecting management or disposition of assets of Client’s retirement plan, or (iii) have any discretionary authority or discretionary responsibility in the administration of Client’s retirement plan or the interpretation of Client’s retirement plan documents, (b) is not the “Administrator” of Client’s retirement plan as defined in ERISA.

Non-Fiduciary Services

Although an investment adviser is considered a fiduciary under the Investment Advisers Act of 1940 and required to meet the fiduciary duties as defined by the Advisers Act, the services listed here as non-fiduciary should not be considered fiduciary services for the purposes of ERISA since Advisor is not acting as a fiduciary to the Plan as the term “fiduciary” is defined in Section 3(21)(A)(ii) of ERISA. The exact suite of services provided to a client will be listed and detailed in the Qualified Retirement Plan Agreement. NHFS provides clients with the following Non-Fiduciary Retirement Plan

Consulting Services:

- Participant Education. NHFS will provide education services to Plan participants about general investment principles and the investment alternatives available under the Plan. NHFS’s assistance in participant investment education will be consistent with and within the scope of DOL Interpretive Bulletin 96-1. Education presentations will not take into account the individual circumstances of each participant and individual recommendations will not be provided unless otherwise agreed upon. Plan participants are responsible for implementing transactions in their own accounts.
- Participant Enrollment. NHFS will assist the client with group enrollment meetings designed to increase retirement plan participation among employees and investment and financial understanding by the employees.
- Qualified Plan Development. NHFS will assist the client with the establishment of a qualified plan by working with them and a selected Third Party Administrator. If the client has not already

selected a Third Party Administrator, we shall assist them with the review and selection of a Third Party Administrator for the Plan.

- Due Diligence Review. NHFS will provide the client with periodic due diligence reviews of their Plan's fees and expenses and their Plan's service providers.
- Benchmarking. NHFS will provide the client benchmarking services and will provide analysis concerning the operations of the Plan.

We can also meet with individual participants to discuss their specific investment risk tolerance, investment time frame and investment selections.

Securities and other types of investments all bear different types and levels of risk. Those risks are typically discussed with clients in defining the investment policies and objectives that will guide investment decisions for their qualified plan accounts. Upon request, as part of our retirement plan services, we can discuss those investments and investment strategies that we believe may tend to reduce these risks for a particular client's circumstances and plan participants.

Clients and plan participants must realize that obtaining higher rates of return on investments entails accepting higher levels of risk. Based upon discussions with the client, we will attempt to identify the balance of risks and rewards that is appropriate and comfortable for the client and other employees. It is still the clients' responsibility to ask questions if the client does not fully understand the risks associated with any investment. All plan participants are strongly encouraged to read prospectuses, when applicable, and ask questions prior to investing.

We strive to render our best judgment for clients. Still, NHFS cannot assure that investments will be profitable or assure that no losses will occur in their portfolios. Past performance is an important consideration with respect to any investment or investment advisor, but it is not necessarily an accurate predictor of future performance.

NHFS will disclose, to the extent required by ERISA Regulation Section 2550.408b-2(c), to you any change to the information that we are required to disclose under ERISA Regulation Section 2550.408b-2(c)(1)(iv) as soon as practicable, but no later than sixty (60) days from the date on which we are informed of the change (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable).

In accordance with ERISA Regulation Section 2550.408b-2(c)(vi)(A), we will disclose within thirty (30) days following receipt of a written request from the responsible plan fiduciary or Plan Administrator (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable) all information related to the Qualified Retirement Plan Agreement and any compensation or fees received in connection with the Agreement that is required for the Plan to comply with the reporting and disclosure requirements of Title 1 of ERISA and the regulations, forms and schedules issued thereunder.

If we make an unintentional error or omission in disclosing the information required under ERISA Regulation Section 2550.408b-2(c)(1)(iv) or (vi), we will disclose to you the correct information as soon as practicable, but no later than thirty (30) days from the date on which NHFS learns of such error or omission.

As of 12/31/2019, NHFS had \$12,288,238 in assets under management on a discretionary basis and \$37,848,349 on a non-discretionary basis.

ITEM 5: FEES AND COMMISSION**Subscription Service Financial Planning Services**

The fee for this service will be in the amount of \$200/month, with a minimum contract period of nine months.

Full Service Financial Planning Fees**SINGLE PERSON:**

If Income and Investable Net Worth is:

- Less than \$350,000 per year, the fee will be \$1,990
- Between \$350,001 and \$550,000 per year, the fee will be \$2,990
- Between \$550,001 and \$2,500,000 per year, the fee will be \$3,990
- Between \$2,500,001 and \$5,000,000 per year, the fee will be \$4,990
- Between \$5,000,001 and \$10,000,000 per year, the fee will be \$5,990
- Over \$10,000,001 per year, the fee will be \$7,990

MARRIED PERSON:

If Income and Investable Net Worth is:

- Less than \$350,000 per year, the fee will be \$2,990
- Between \$350,001 and \$550,000 per year, the fee will be \$3,990
- Between \$550,001 and \$2,500,000 per year, the fee will be \$4,990
- Between \$2,500,001 and \$5,000,000 per year, the fee will be \$5,990
- Between \$5,000,001 and \$10,000,000 per year, the fee will be \$6,990
- Over \$10,000,001 per year, the fee will be \$8,990

NHFS provides to clients complex Estate Planning services involving the consideration of trust, charitable giving techniques, etc. for an additional fee ranging from \$500 to \$5,000 depending on the complexity of the plan.

The effective date for this fee schedule is March 31, 2020. The fee will be 50% payable by check or credit card upon signing of the financial services and advisory agreement (the advisory agreement) and the balance due upon delivery of the financial plan report (generally within three months from the date of the agreement). At that time, the contractual relationship will be met between NHFS and the client.

Although the advisory agreement will end with the acceptance of the financial plan report by the client, NHFS intends to provide, at no charge, financial planning updating services to full service financial planning clients for a period of up to twelve months after signing the advisory agreement. Subsequent to the completion of the twelve-month period, the client may choose to engage NHFS for an additional annual review and update of their plan. After the update is delivered to the client, the new agreement will end. However, NHFS intends to provide at no charge financial planning updating services to update clients for a period of twelve months (from the renewal date). The fee for this service will be $\frac{3}{4}$ of the client's original fee, payable on the anniversary date of the original advisory agreement. The new advisory agreement will be a separate advisory agreement and the signing of the initial advisory agreement does not obligate the client in any way to engage NHFS for succeeding years. NHFS retains the right to decline

any engagement for any twelve-month period(s). Under rare circumstances, this fee may be negotiated at the discretion of the advisor.

The client acknowledges that NHFS strongly recommends at a minimum an annual review and updates to assure the planning process is current and any changes necessary to the ongoing planning are made in a timely fashion.

The client may cancel the advisory agreement without penalty within five business days of the signing of the agreement. Should the client cancel the advisory agreement after the five-day period but prior to the delivery of the plan, a refund will be paid to the client, less time spent on the plan calculated at a rate of \$275 per hour.

NHFS guarantees client satisfaction with the plan upon initial presentation of the plan. If NHFS is not able to rewrite the plan to the client's satisfaction, NHFS will refund the total of all fees paid. The client agrees to return the original plan to NHFS upon obtaining the refund.

Limitations:

Financial plans issued by NHFS will be generic in nature. Plan will discuss types of investments and product solutions necessary to achieve a client's specific goals.

Limited Financial Planning Service Fees (Including Divorce Planning)

Alternately, NHFS will work with clients on an hourly basis for specific issue planning, including divorce planning. The client acknowledges that NHFS will not be held accountable for results of recommendations that fall outside the scope of the engagement since the engagement itself is not comprehensive in nature. The fee is \$275 per hour and will be applied toward a full service financial plan fee if the client wishes, within 90 days of the hourly engagement. The effective date for this fee schedule is March 31, 2020. The fee will be 50% of the estimated cost of the limited financial plan, payable by check or credit card upon signing of the financial services and advisory agreement (the advisory agreement), and the balance due upon delivery of the limited financial plan report. At that time, the contractual relationship will be met between NHFS and the client. Under rare circumstances, this fee and/or service may be negotiated at the discretion of the advisor.

Bundling of Services

For clients participating in AssetMark, and/or the TD Ameritrade Institutional Private Client Program who are also renewing their financial planning agreement with NHFS, NHFS will apply a courtesy discount to the financial planning renewal fee equal to 33 basis points (.0033) of the total annual advisor revenue per client under management calculated as of the last day of the previous calendar year ended. Calendar years end on the last day of December.

AssetMark Fees

Accounts on the AssetMark Platform are assessed a total Account Fee. This Account Fee includes the Financial Advisor's fee plus the fees for utilizing the AssetMark Platform (together the "Advisory Fee"). Additionally, the Account Fee may also include fees payable to any third-party Discretionary Manager under the IMA, CMA or UMA investment solutions. Fees and compensation for using the AssetMark Platform including Discretionary Manager Fee Schedules, are provided in the AssetMark Platform Disclosure Brochure. After the AssetMark Platform Fee is deducted from the Advisory Fee, the resulting

net fees are payable to the Financial Advisor. Client fees are payable quarterly, in advance, based on assets under management. Clients may terminate AssetMark accounts at any time and receive a full pro-rata refund of any unearned fees. NHFS uses the following standard fee schedules for accounts on the AssetMark Platform, depending on the investment solution for the account. Client suitability for the strategist is taken into consideration when selecting the strategist. Custodial fees are deducted from client's account. NHFS, in its sole discretion, may waive its minimum fee and/or charge a lesser Investment Advisory Fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

NHFS TD Ameritrade Institutional Private Client Model Program Fees

The advisory fee is a maximum fee of 1.6% and payable in advance at the beginning of each three-month period and is deducted from the investment account by TD Ameritrade upon the request of NHFS. Client may terminate the account at any time without penalty and NHFS would return to client within 30 days of account termination a pro-rated portion of the three-month fee that was paid by client at the beginning of the quarter. Separate custodial charges and trading charges are set forth in the separate custodial agreement executed between client and custodian TD Ameritrade Institutional and are deducted from the account. Under rare circumstances, these fees and/or services may be negotiated at the discretion of the advisor.

NHFS 403(b) Asset Allocation & Rebalancing Program

NHFS offers investment strategies through the NHFS Asset Allocation & Rebalancing Program for TIAA-CREF and Fidelity Clients. Clients who have 403(b) retirement accounts may contract with NHFS on an annual basis to rebalance their accounts as needed using allocation models and in accordance with client's risk tolerance. The advisory fee is a maximum fee of 1.6%. Under rare circumstances, these fees and/or services may be negotiated at the discretion of the advisor.

Seminar Services

At times, NHFS may be requested to hold financial planning seminars for interested groups. NHFS may charge such groups a flat, fixed fee that ranges from \$25 to \$100 per person, payable in advance. NHFS will, however, pay its expenses in holding such a seminar, unless otherwise negotiated with the group.

General Information on Fees

NHFS charges 0.5% on the entire pension plan that is held at both Mid-Atlantic and Great West. Statements and all account correspondence are provided by Mid-Atlantic and Great West on a quarterly basis.

Under certain circumstances, NHFS may negotiate fees.

The fees charged will never be based on the capital gains or the capital appreciation of any funds of any client.

A client agreement may be cancelled, by either party, for any reason, upon receipt of written notice, within five days of signing initial agreement. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. After this five-day period, the client agreement may be cancelled, by either party, for any reason, within 30 days upon receipt of written notice.

ITEM 6: PERFORMANCE-BASED FEE AND SIDE-BY-SIDE MANAGEMENT

NHFS does not charge Performance-Based Fees and does not participate in Side-By-Side Management.

ITEM 7: TYPES OF CLIENTS

NHFS generally provides investment advice to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and business entities. The firm's requirements for opening or maintaining an account, such as minimum account size, are dependent upon each investment management company's requirements.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

Investing in securities involves a risk of loss that clients should be prepared to bear. NHFS uses fundamental and technical methods to analyze securities. Information relevant to client holdings regarding earnings, growth, sales growth, price earnings, ratios, book value, dividend records, annual reports, prospectuses, filings with the Securities and Exchange Commission, etc. are used and purchased from sources including Standard and Poor's, industry newsletters, periodicals, and websites. Consideration is given to new tax law proposals, the economic outlook of a particular industry, as well as general economic conditions.

NHFS also uses data from client questionnaires, including cost basis, tax consequences, and other factors relative to the client. NHFS may employ computer software packages procured from third parties in an attempt to better assist the client to formulate and communicate his or her present position and goals.

Investment strategies used to implement any investment advice given to clients include long term purchases and short term purchases. NHFS adopts a long-term strategy to meet the clients' overall financial goals. In advising retail clients of Advisor investing in the AssetMark Platform, NHFS uses model portfolios of mutual funds, Exchange Traded Funds (ETF's), individual securities, and Variable Annuity sub-accounts provided by a number of institutional investment strategists and based on the information, research, asset allocation methodology and investment strategies of these institutional strategists. Regarding Privately Managed Account and Unified Managed Account investment solutions, NHFS also introduces clients to, and advises on the selection of, independent investment managers who provide discretionary management of individual portfolios using a variety of different securities analysis methods, sources of information and investment strategies. Clients will receive separate disclosures from such investment managers regarding any such investment manager's advisory services. With respect to clients investing in the AssetMark Platform, NHFS introduces clients to, and advises on the selection of, independent investment managers who provide discretionary management of individual portfolios including a wide variety of different securities types. Clients will receive a separate disclosure from such investment managers regarding any such investment manager's advisory services.

ITEM 9: DISCIPLINARY INFORMATION

The advisers at NHFS have not been involved in material disciplinary events.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Paul A. Strebel is a partner of an accounting firm and a Certified Public Accountant. He may spend more than 50% of his time on this activity. Some of the accounting clients may become financial planning or

investment management clients and some of the financial planning or investment management clients may become accounting clients.

Paul A. Strebel and Leslie A. Strebel are partners of a business coaching and consulting firm and may spend more than 50% of their time on this activity.

Paul A. Strebel and Leslie A. Strebel are shareholders in Mipalee Inc. dba Lee Alexander and Company. Time spent on this activity is approximately 20 hours per month.

Paul A. Strebel is a Professor of Personal Financial Management, Financial Planning and Wealth Management, and Financial Accounting Principles at Cornell University. Time spent on this activity is approximately 200 hours per semester.

NHFS may refer clients to licensed insurance agents for implementation of financial plan recommendations. Leslie Strebel and Angela O'Neill are licensed insurance agents. As licensed insurance agents, they could earn a commission on the sale of such insurance. All clients should know that they are not obligated to use Leslie or Angela or companies represented by Leslie or Angela, and there are no fee sharing arrangements. Paul A. Strebel is not a licensed insurance agent and therefore will not receive any commission from the sale of such insurance. Paul A. Strebel may indirectly derive compensation if clients choose to implement insurance recommendations through Leslie A. Strebel. SAL, Inc. d/b/a Financial Solutions is registered as an insurance agent in the state of New York and various other states as needed. Thus, it may also earn reasonable and customary commissions on the sale of insurance products.

All clients maintain the right to choose any registered representative, broker/dealer, or insurance company they wish to implement financial plan recommendations.

Each client that is a Plan has a named fiduciary. The Plan Fiduciary is solely responsible for determining whether a particular security is an appropriate investment for the Plan in light of the Plan's overall investment objectives. The Plan Fiduciary must make the investment decisions about purchases of any products based on his or her understanding of the Plan's needs and objectives, and NHFS is in no way responsible for any investment decisions. The Plan Fiduciary is free to seek independent advice about the appropriateness of any investment for the Plan.

NHFS may have arrangements with unrelated third party service providers, including but not limited to other registered investment advisors such as Focus Point Solutions, Inc. (FPS) to service client accounts, including, but are not limited to research, due diligence, reporting, portfolio analysis, and back office administration. FPS generally does not have any direct contact with our clients. FPS provides services directly to us and we are solely responsible for Client accounts. Upon entering into an agreement for advisory services with NHFS, clients authorize us to use these unrelated third-party service providers to service their account, including billing and the deduction of fees from client accounts. Clients agree to allow us to share non-public, personal information with these unrelated third-party service providers for the purpose of administering and managing client's account. We require unrelated third-party service providers to execute a confidentiality agreement and not share client information with any unauthorized person or entity. The use of unrelated third-party service providers will not cause a client to incur any additional fees. We pay unrelated third-party service providers for services out of the total advisory fee charged to a client. Our fee schedule is disclosed under Item 5 above.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING***CODE OF ETHICS******Code of Ethics Introduction***

CFP® Board adopted the Code of Ethics to establish the highest principles and standards. These Principles are general statements expressing the ethical and professional ideals certificants and registrants are expected to display in their professional activities. As such, the Principles are aspirational in character and provide a source of guidance for certificants and registrants. The Principles form the basis of CFP® Board's Rules of Conduct, Practice Standards and Disciplinary Rules, and these documents together reflect CFP® Board's recognition of certificants' and registrants' responsibilities to the public, clients, colleagues and employers.

These principles apply to all CFP® certificants or those seeking CFP® certification and provide guidance to them in the performance of their professional services.

Principle 1 – Integrity

Provide professional services with integrity.

Integrity demands honesty and candor which must not be subordinated to personal gain or advantage. Certificants are placed in positions of trust by clients, and the ultimate source of that trust is the certificant's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity

Provide professional services objectively.

Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which a certificant functions, certificants should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence

Maintain the knowledge and skill necessary to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Certificants make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness

Be fair and reasonable in all professional relationships.

Disclose conflicts of interest. Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated.

Principle 5 – Confidentiality

Protect the confidentiality of all client information.

Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism

Act in a manner that demonstrates exemplary professional conduct.

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business-related activities. Certificants cooperate with fellow certificants to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence

Provide professional services diligently.

Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Participation or Interest in Client Transactions and Personal Trading

Clients are not obligated to implement any recommendations made during the financial planning process. If a client chooses to implement any recommendations, the client may choose to implement them through NHFS or with any appropriately licensed individual or firm outside of NHFS.

On occasion, Paul A. Strebel, Leslie A. Strebel, and Angela O'Neill may buy or sell securities that they recommend to clients. There is no conflict of interest as the securities are widely held and publicly traded.

NHFS and persons associated with NHFS are permitted to buy and/or sell securities that NHFS recommends.

In accordance with Section 204A of the Advisers Act, NHFS also maintains and enforces written policies reasonably designed to prevent the unlawful use of material non-public information by NHFS or any of its Associated Persons.

As a personal financial planning client of a CFP®, registered CERTIFIED FINANCIAL PLANNER™, you have the right to receive annually the current NHFS Form ADV 2A and 2B or the current revision of the disclosure you received when our advisory relationship began, as well as our Code of Ethics. The NHFS Form ADV 2A and 2B and Code of Ethics are also available upon request to prospective clients.

ITEM 12: BROKERAGE PRACTICES

NHFS does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients' money over using a lower-cost custodian.

Regarding the AssetMark Platform, NHFS assists the client in selecting the risk/return objective and Portfolio Strategists that best suit the client's objectives. The client then specifically directs the account to be invested in accordance with the chosen asset allocation. When the client selects the asset allocation, the client further directs that the account be automatically adjusted to reflect any adjustment in the asset allocation by the selected Portfolio Strategist. This client authorization results in the purchases and sale of certain mutual funds or ETFs (or transfers between variable annuity sub-accounts) without further authorization by the client or any other party at such time as the Portfolio Strategist changes the composition of the selected model asset allocation. The client receives confirmation of all transactions in the account and is free to terminate participation in the Platform and retain or dispose of any assets in the account at any time. NHFS has no authority to cause any purchase or sale of securities in any client account, or change the selected model asset allocation or to direct the account to be invested in any manner other than as previously authorized by the client (written or verbal). If a client selects an IMA, UMA or CMA investment solution, the third-party Discretionary Managers are granted the authority to manage the accounts on a discretionary basis, including the authority to buy, sell, select, remove and select securities and other investments for the account, and to select broker-dealers or others through which transaction will be effected.

ITEM 13: REVIEW OF ACCOUNTS

Financial planning reviews are performed on an annual basis if the client chooses to engage NHFS for an additional twelve-month period. There are no different levels of review. However, at the request of the client, NHFS intends to provide, at no charge, financial planning updating services to update clients for a period of twelve months (from renewal date).

NHFS advisors perform investment advisory services reviews on an as needed basis. There are no different levels of review.

NHFS advisors review and update the financial plans and investment portfolios. Clients receive regular custodial account statements and transaction ledgers from custodians.

1. Clients with investments on the AssetMark Platform will receive periodic custodial account statements from their account custodian not less frequently than quarterly. Custodians, Pershing and TD Ameritrade, issue monthly custodial account statements, while AssetMark Trust issues quarterly custodial account statements. Additionally, NHFS issues quarterly written reports to its investment advisory clients. These written reports generally contain a list of assets, investment results, and statistical data related to the client's account, and are made available via mail or electronic delivery. The information in these reports may vary from custodial statements based on

accounting procedures, reporting dates, or valuation methodologies of certain securities. We urge clients to carefully review these reports and compare the statements that they receive from their custodian to the reports that we provide.

Clients with investments at TDAmeritrade Institutional will receive monthly custodial account statements from TDAmeritrade. These written reports are made available via mail or electronic delivery.

Clients with pension and profit-sharing plans at Mid-Atlantic and Great West will receive quarterly custodial account statements from their respective custodian of the plan and will receive an annual review of their account.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

NHFS may recommend Leslie A. Strebel to financial planning clients that wish to implement their plan by purchasing insurances through Financial Solutions. Leslie A. Strebel benefits directly from commissions earned through financial plan implementation. Paul A. Strebel benefits indirectly from commissions earned by his wife, Leslie A. Strebel.

NHFS may recommend Angela O'Neill to financial planning clients that wish to implement their plan by purchasing insurances and/or securities through Angela O'Neill. Angela O'Neill benefits directly from commissions earned through financial plan implementation.

NHFS may earn incentive awards for placing business with third party providers that may include but are not limited to training, seminars, marketing expense reimbursement, and due diligence trips.

Additionally, fees may be earned directly by Leslie A. Strebel and Angela O'Neill, and they may receive incentive awards earned partially through the implementation of the plan recommendations (should the client choose Leslie or Angela for implementation). A client or prospective client has the right to ask Paul, a CFP® certificant, at any time for information about his compensation related to the services he provides. Paul will communicate the requested information in reasonable detail as it relates to the client's financial planning engagement, including compensation derived from plan implementation. The disclosure of compensation:

1. May be expressed as an approximate dollar amount or percentage, or as a range of amount or percentages;
2. Shall be made at a time and to the extent that the requested information may be reasonably ascertained;
3. Will be based on reasonable assumptions, with estimates clearly identified, and;
4. Will be updated in a timely manner if actual compensation significantly differs from any estimates.

With respect to the AssetMark Platform, NHFS may, subject to negotiation with AssetMark, receive certain allowances, reimbursements or services from AssetMark in connection with NHFS investment advisory services to its clients, as described below and in the Appendix 1 of the AssetMark Platform Disclosure Brochure. Under AssetMark's Gold/Platinum Premier Consultant Program, NHFS would be entitled to receive a quarterly business development allowance for reimbursement for qualified marketing/practice management expenses incurred by NHFS. These amounts range from \$5,000 to \$10,000 annually, depending on the amount of the adviser's client assets managed within the Platform. Historically, NHFS stays within the \$5,000 to \$7,000 range. AssetMark may also bear the cost of airfare for firms such as NHFS to attend AssetMark's annual conference or to conduct due diligence visits to

AssetMark's offices. In addition, AssetMark may, from time to time, contribute to the costs incurred by participating firms such as NHFS with conferences or other client events conducted by such firms and their representatives. AssetMark may also provide opportunities for participating firms such as NHFS to receive fee reductions and /or allowances of client assets invested through the Platform. These arrangements are entered into between AssetMark and a firm such as NHFS on an individually negotiated basis. NHFS may agree to provide AssetMark with introductions to and information concerning its advisory representatives and provide the representatives with information concerning AssetMark's Platform and products, and permit AssetMark to participate in broker-dealer meetings and workshops. In addition to the fee reductions and/or allowances granted the firm by AssetMark, AssetMark may agree to provide the firm or its representatives with organizational consulting, education, training and marketing support.

ITEM 15: CUSTODY

NHFS does not provide custodial services to its clients. Client assets are held with banks, financial institutions, or registered broker-dealers that are "qualified custodians." Clients will receive statements directly from the qualified custodians at least quarterly. We urge clients to carefully review those statements and compare the custodial records to the reports that we provide them. The information in our reports may vary from custodial statement based on accounting procedures, reporting dates or valuation methodologies of certain securities.

ITEM 16: INVESTMENT DISCRETION

NHFS has discretionary authority to manage securities accounts on behalf of clients who participate in the NHFS TD Ameritrade Institutional Private Client Model Program. The execution of Limited Power of Attorney is established when a client acknowledges discretion by signing their initials on the new account application.

With respect to the AssetMark Platform, with the exception of Advisor Strategist program described in the next paragraph, NHFS does not take any independent discretionary authority over client accounts. NHFS does, however, offer clients participation in the AssetMark Platform, an asset allocation Platform more fully described in the Appendix 1 – Platform Disclosure Brochure. Asset allocations composed by a group of independent investment strategists ("Portfolio Strategists") are offered under the Platform, with the different model allocations designed to satisfy a gradient of risk/return objectives. The Portfolio Strategists have no direct relationship with NHFS or client, make no analysis of and do not consider the clients' individual circumstances or objectives, and do not tailor the model asset allocation to any specific clients' needs, circumstances or objectives, but only to the stated risk/return objectives.

The Advisor as Strategist Program on the AssetMark Platform enables NHFS to implement asset allocation models on behalf of our clients as well as the clients of other advisors on the AssetMark Platform. A portion of the fees paid by clients of other affiliated advisors is paid to NHFS. The assets in these models are considered discretionary.

ITEM 17: VOTING CLIENT SECURITIES

NHFS does not retain any right to vote client proxies on behalf of its clients. Clients receive their voting proxies and other solicitations directly from their custodian and the fund companies that their securities accounts are invested in. Clients may contact their custodian or fund companies directly regarding questions about a particular solicitation.

With respect to the AssetMark Platform, the client retains the right to vote proxies if the account is invested in a Mutual Fund, ETF, or Variable Annuity Investment Solution. If the account is invested in an IMA, CMA, or UMA Investment Solution, the client designates the applicable Discretionary Manager as their agent to vote proxies on securities in the account. Client acknowledges that as a result of this voting designation they are also designating the Discretionary Manager as their agent to receive proxies, proxy solicitation materials, annual reports provided in connection with proxy solicitations, and other materials provided in connection with the above actions relating to the assets in the account. However, the client retains the right to vote proxies and may do so by notifying advisor in writing of the desire to vote future proxies.

ITEM 18: FINANCIAL INFORMATION

NHFS does not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance, so has not provided a balance sheet here.

FORM ADV PART 2B: BROCHURE SUPPLEMENT - PAUL STREBEL

ITEM 1: COVER PAGE

Name of Investment Firm: New Horizon Financial Strategies, LLC

Address: 944 Dryden Road, Ithaca, NY 14850

Phone Number: (607) 275-1275

Website: www.strebelcpa.com

Date: 4/13/2020

This brochure supplement provides information about Paul Strebel that supplements the NHFS brochure (Form ADV Part 2A). All clients are offered a copy of this brochure annually. Please contact NHFS at (607) 275-1275 if you did not receive the NHFS brochure or if you have any questions about the contents of this supplement.

ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Paul Strebel: Born 1958; BBA in Accounting; has been a Certified Public Accountant since 1991; has been a CERTIFIED FINANCIAL PLANNER™ certificant since 1985; has been a business development consultant to business owners, including other financial professionals, since 1999; has been with NHFS since February 1996.

Employment/Business Affiliations:

Strebel & Strebel, CPAs, Ithaca, NY, CPA Firm, CPA/Partner, 1/1986 to Present.

Strebel & Richards, CPAs, Randolph, NJ, CPA Firm, CPA/Partner, 01/2012 to 12/2019.

ITEM 3: DISCIPLINARY INFORMATION

There are no legal or disciplinary events material to Paul Strebel.

ITEM 4: OTHER BUSINESS ACTIVITIES

Paul A. Strebel is a partner of an accounting firm and a Certified Public Accountant. He may spend more than 50% of his time on this activity. Some of the accounting clients may become financial planning or investment management clients and some of the financial planning or investment management clients may become accounting clients. Paul A. Strebel and Leslie A. Strebel are partners of a business coaching and consulting firm and may spend more than 50% of their time on this activity.

Paul A. Strebel and Leslie A. Strebel are shareholders in Mipalee, Inc. dba Lee Alexander and Company. Time spent on this activity is approximately 20 hours per month.

Paul A. Strebel is a Professor of Personal Financial Management, Financial Planning and Wealth Management, and Financial Accounting Principles at Cornell University. Time spent on this activity is approximately 200 hours per semester.

ITEM 5: ADDITIONAL COMPENSATION

Paul Strebel does not receive an economic benefit from providing advisory service to someone who is not a client. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the supervised person's regular salary.

ITEM 6: SUPERVISION

NHFS requires those involved in determining or giving investment advice to clients to hold at least a four-year degree with a minimum of 10 years' experience advising clients on financial planning and investment issues or a Master's degree in Personal Financial Planning or be a CERTIFIED FINANCIAL PLANNER™ certificant. NHFS requires ongoing participation in educational programs made available to financial service professionals.

Paul Strebel is a Partner for NHFS and may be contacted at (607) 275-1275. Leslie Strebel is the secondary contact person and may be reached at the same phone number.

FORM ADV PART 2B: BROCHURE SUPPLEMENT - LESLIE STREBEL

ITEM 1: COVER PAGE

Name of Investment Firm: New Horizon Financial Strategies, LLC

Address: 944 Dryden Road, Ithaca, NY 14850

Phone Number: (607) 275-1275

Website: www.strebelcpa.com

Date: 4/13/2020

This brochure supplement provides information about Leslie Strebel that supplements the NHFS brochure (Form ADV Part 2A). All clients are offered a copy of this brochure annually. Please contact NHFS at (607) 275-1275 if you did not receive the NHFS brochure or if you have any questions about the contents of this supplement.

ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Leslie Strebel: Born 1958; BA in Psychology; has been President of Financial Solutions, a financial services firm, since 1997; was District Manager for Massachusetts Mutual Life Insurance Company for six years until 1996; has been a business development consultant to business owners, including other financial professionals, since 2000. Broker affiliation was with Aurora Private Wealth Capital (APW Capital Inc.), from June 2011 to December 2018. Leslie Strebel has been with NHFS since January 2001.

Employment/Business Affiliations:

Aurora Private Wealth Capital (APW Capital Inc.), Parsippany, NJ, 6/2011 to 12/2018.

Ensemble Financial Services, Inc., Pittsford, NY 10/2009 to 6/2011.

FSC Securities Corporation, Atlanta, GA, RIA, Advisory Rep., 1/1999 to 9/2009.

SAL, Inc., Ithaca, NY, Financial Services Firm, Registered Rep, Insurance Agent, 1/1999 to Present.

ITEM 3: DISCIPLINARY INFORMATION

There are no legal or disciplinary events material to Leslie Strebel.

ITEM 4: OTHER BUSINESS ACTIVITIES

NHFS may refer clients to Leslie Strebel, who is a licensed insurance agent, for implementation of financial plan recommendations. Leslie Strebel benefits directly from commissions earned through financial plan implementation. All clients should know that they are not obligated to use Leslie or companies represented by Leslie, and there are no fee sharing arrangements. No product or services are provided in exchange for client referrals.

Paul A. Strebel and Leslie A. Strebel are partners of a business coaching and consulting firm and may spend more than 50% of their time on this activity.

Paul A. Strebel and Leslie A. Strebel are shareholders in Mipalee Inc. dba Lee Alexander & Co. Time spent on this activity is approximately 3 hours per month.

Leslie A. Strebel serves on the Tompkins Time Traders board. Time spent on this activity is approximately 4 hours per month.

ITEM 5: ADDITIONAL COMPENSATION

Leslie Strebel does not receive an economic benefit from providing advisory service to someone who is not a client. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the supervised person's regular salary.

ITEM 6: SUPERVISION

NHFS requires those involved in determining or giving investment advice to clients to hold at least a four-year degree with a minimum of 10 years' experience advising clients on financial planning and investment issues or a Master's degree in Personal Financial Planning or be a CERTIFIED FINANCIAL PLANNER™ certificant. NHFS requires ongoing participation in educational programs made available to financial service professionals.

Paul Strebel is a Partner for NHFS and may be contacted at (607) 275-1275. Leslie Strebel is the secondary contact person and may be reached at the same phone number.

FORM ADV PART 2B: BROCHURE SUPPLEMENT - ANGELA O'NEILL

ITEM 1: COVER PAGE

Name of Investment Firm: New Horizon Financial Strategies, LLC

Address: 944 Dryden Road, Ithaca, NY 14850

Phone Number: (607) 275-1275

Website: www.strebelcpa.com

Date: 4/13/2020

This brochure supplement provides information about Angela O'Neill that supplements the NHFS brochure (Form ADV Part 2A). All clients are offered a copy of this brochure annually. Please contact NHFS at (607) 275-1275 if you did not receive the NHFS brochure or if you have any questions about the contents of this supplement.

ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Angela O'Neill: Born 1967; BBA in Accounting; has been a CERTIFIED FINANCIAL PLANNER™ certificant since 2019; was a Financial Advisor for Smith Barney for nine years until 2006. Broker affiliation was with Aurora Private Wealth Capital (APW Capital Inc.), from June 2011 to June 2019. Angela O'Neill has been with NHFS since September of 2006.

Employment/Business Affiliations:

Aurora Private Wealth Capital (APW Capital Inc.), Parsippany, NJ, 6/2011 to 6/2019.

Ensemble Financial Services, Inc., Pittsford, NY 10/2009 to 6/2011.

FSC Securities Corporation, Atlanta, GA, Registered Representative, 9/2006 to 9/2009.

Smith Barney, Ithaca, NY, Financial Advisor, 10/1997 to 9/2006.

ITEM 3: DISCIPLINARY INFORMATION

There are no legal or disciplinary events material to Angela O'Neill.

ITEM 4: OTHER BUSINESS ACTIVITIES

NHFS may refer clients to Angela O'Neill, who is a licensed insurance agent, for implementation of financial plan recommendations. Angela O'Neill benefits directly from commissions earned through financial plan implementation. All clients should know that they are not obligated to use Angela or companies represented by Angela, and there are no fee sharing arrangements. No product or services are provided in exchange for client referrals.

ITEM 5: ADDITIONAL COMPENSATION

Angela O'Neill does not receive an economic benefit from providing advisory service to someone who is not a client. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the supervised person's regular salary.

ITEM 6: SUPERVISION

NHFS requires those involved in determining or giving investment advice to clients to hold at least a four-year degree with a minimum of 10 years' experience advising clients on financial planning and investment issues or a Master's degree in Personal Financial Planning or be a CERTIFIED FINANCIAL PLANNER™ certificant. NHFS requires ongoing participation in educational programs made available to financial service professionals.

Paul Strebel is a Partner for NHFS and may be contacted at (607) 275-1275. Leslie Strebel is the secondary contact person and may be reached at the same phone number.