

Item 1 – Cover Page

ROSENBAUM FINANCIAL, INC.

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This Wrap Fee Program Brochure (“Wrap Brochure”) provides information about the qualifications and business practices of Rosenbaum Financial, Inc. If you have any questions about the contents of this Wrap Brochure, please contact us at (503) 352-1300 or mark@rosenbaumfinancial.com. Rosenbaum Financial, Inc. is an investment advisor registered with the United States Securities and Exchange Commission (“SEC”). Registration of an investment advisor does not imply any level of skill or training. The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about Rosenbaum Financial, Inc. is available on the SEC’s website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Rosenbaum Financial, Inc. is 173805.

Item 2 – Material Changes

Our previous annual update was filed on March 28, 2019. Since that date, we have no material changes.

We will ensure that all current clients receive a Summary of Material Changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. A Summary of Material Changes is also included with our Brochure on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Rosenbaum Financial, Inc. is 173805. We may further provide other ongoing disclosure information about material changes as necessary and will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Mark Rosenbaum, Chief Compliance Officer of Rosenbaum Financial, Inc. at (503) 352-1300 or mark@rosenbaumfinancial.com. Our Brochure is provided free of charge.

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Item 4 – Services, Fees and Compensation

- A** Rosenbaum Financial, Inc. (“Rosenbaum Financial” “we” or “us”) helps Clients coordinate and prioritize their financial lives with all aspects of their life goals. For many clients this involves close coordination of business, retirement and personal assets. Client input and involvement is critical to our customized approach to investment management. We spend many meetings with our clients discussing short, mid and long-term objectives prior to establishing investment policy. These discussions will not only involve questions of risk and income but also key factors such as taxes, family circumstances, emotional considerations, and inheritance objectives. Many clients have sensitive estate planning needs which are to be addressed through their investment plans. We require ongoing conversations with clients following the implementation of investment strategies. We meet with our clients to review progress, understand changes in circumstance and to address needed changes due to market movement.

Rosenbaum Financial can have discretionary authority over Client funds. Discretionary authority means that we have the authority to determine, without obtaining specific Client consent, the securities bought or sold and the amount of securities bought or sold. The only restrictions on the above discretionary authority are those set by the Client on a case-by-case basis. Discretionary authority allows us to act on behalf of the Client in most matters necessary or incidental to the handling of the account, including monitoring certain assets, without the Client’s prior approval.

Advice and services are tailored to the stated objectives of the Client(s). We create an investment policy statement (“IPS”) for each client that summarizes their investment objectives, risk tolerance, time horizon, and projected future needs. This policy guides us in objectively and suitably managing the Client’s investment accounts. It also provides a means by which to evaluate results. In addition, we also create a supplement to the IPS entitled, the “Efficient Frontier.” The Efficient Frontier is used to analyze Client risk and determine asset allocation by generating future projections on different asset allocations models ranging from conservative to aggressive. Both documents are reviewed and updated at least every other year as a part of our ongoing review process. We recognize that the IPS and Efficient Frontier set the tone for our investment work and that many clients may have objectives relating to tax and inheritance which are dealt with and recognized/discussed in other planning documents prepared by us or key, outside, legal and accounting professionals.

Our approach uses widely diversified portfolios and individualized strategies to manage investments. Our investment strategies focus on long term results using the lowest possible levels of risk to obtain highest reasonable returns. Our investment recommendations generally include mutual funds, exchange-traded funds, exchange-listed equity securities, separately managed accounts along with certain alternative investments, such as private real estate investment trusts, private partnerships, oil and gas, etc., which may have limited liquidity. We also recommend certificates of deposit, municipal securities, U.S. government securities and money market funds. If Clients hold other types of investments, we will advise them on those investments also. Clients may impose restrictions on investing in certain securities or types of securities. We consider such restrictions when preparing the Investment Policy Statement.

Rosenbaum Financial provides investment advisory and financial planning services to its Clients. Services may include the analysis of the Client's current portfolio, development of an investment policy statement, implementation of a recommended portfolio(s), and ongoing monitoring of the investment portfolio(s).

We typically use the following standard fee schedule:

Assets Under Management*	Advisory Fee
Under \$500,000	1.50%
\$500,000 - \$999,999	1.25%
\$1,000,000 - \$1,999,999	1.00%
\$2,000,000 - \$3,999,999	0.80%
\$4,000,000 - \$5,999,999	0.70%
\$6,000,000 - \$7,999,999	0.60%
\$8,000,000 - \$9,999,999	0.55%
\$10,000,000 - \$14,999,999	0.50%
\$15,000,000 - \$19,999,999	0.45%
\$20,000,000 - \$29,999,999	0.40%
\$30,000,000 - \$39,999,999	0.35%
\$40,000,000 - \$49,999,999	0.30%
\$50,000,000 and Over	Negotiable

* Rosenbaum Financial generally has a \$500,000 account minimum per household that can be waived in Rosenbaum Financial's sole discretion. Fees are generally negotiable.

We bill the Client monthly in advance and send the custodian a notice of the amount of the fee to be deducted from the Client's account. Fees are paid directly to us from the account by the custodian upon our submission of an invoice to custodian. Payment of fees may result in the liquidation of Client's securities if there is insufficient cash in the account. The fee is based on the average daily market value of the Client's account over the immediately preceding month.

Market value means the value of all assets in the account (not adjusted by any margin debit). To determine value, securities and other instruments traded on a market for which actual transaction prices are publicly reported shall be valued at the last reported sale price on the principal market in which they are traded. Other readily marketable securities and other instruments shall be priced using a pricing service or through quotations from one or more dealers. All other assets shall be valued at fair value by Rosenbaum Financial and in accordance with Rosenbaum Financial's fiduciary duty.

Rosenbaum Financial's wrap fee program provides that participating Clients will pay their respective AUM fee as listed above at the same breakpoints as non-wrap fee Clients, but for wrap fee program participant Clients, Rosenbaum Financial will pay all Client transaction and ticket charges for the purchase or sale of Mutual Funds, ETF and individual equities that are purchased, transferred, or sold by Rosenbaum Financial so long as they are not any of the securities that were initially transferred into the account at or about the time of account

opening. Client will still be responsible for ticket charges or any other charges related to the sale or transfer of the initial securities transferred into their custodial account. In limited circumstances, Rosenbaum Financial may reimburse a portion of the fees associated with the preparation of a Client's tax filings. The decision of whether to reimburse and the amount of such reimbursement is made exclusively by Rosenbaum Financial at its sole discretion. Rosenbaum Financial receives a portion of the wrap fee paid by the client equal to the AUM fee charged to the Client minus the fees that it pays as listed above.

Clients that are enrolled in the wrap fee program will pay less for their advisory services than clients not enrolled in the wrap fee program because wrap fee program clients will not pay certain custody/transaction costs as described above.

- B** In determining whether to establish an account under our wrap fee program, you should be aware that the overall cost to you of the program may be higher or lower than you might incur by purchasing separately, or unbundled the types of securities available in the program. In order to compare the cost of the program with unbundled services, you should consider the turnover rate in our investment strategies, trading activity in the account and standard advisory fees and brokerage commissions that would be charged at our custodian, or at other broker-dealers and investment advisors.

Depending upon the percentage wrap-fee charged by our firm (as described more fully above), the amount of portfolio activity in your account, and the value of custodial and other services provided, the wrap-fee may or may not exceed the aggregate cost of such services if they were to be provided separately and/or if we were to negotiate transaction fees and seek best price and execution of transactions for your individual account. In as much as the execution costs for transactions effected in your account will be paid by our firm, a conflict of interest arises in that we may have a disincentive to trade securities in your account.

- C** Clients that are enrolled in the wrap fee program will still be required to pay certain fees including:
- The Client's proportionate share of any internal mutual fund's fees and charges;
 - The Client's proportionate share of internal fees and expenses of exchange-traded funds such as fees and expenses for investment advisory services, administration, and other fund-level expenses;
 - The Client's proportionate share of any fees and expenses on Separately Managed Accounts;
 - Client charges imposed by the Client's current custodian (e.g., a transfer or termination fee) before the assets are transferred to Rosenbaum Financial;
 - Client charges imposed by the Rosenbaum Financial's custodian (e.g., a transfer or termination fee) before the assets are transferred from Rosenbaum Financial;

- Client charges necessary to liquidate incoming positions into our recommended portfolio.

D Rosenbaum Financial and its investment advisor representatives receive compensation as a result of your participation in the wrap fee program. This compensation is not more than the amount Rosenbaum Financial and its investment advisor representatives would receive if you paid separately for investment advice, brokerage, and other services.

Item 5 – Account Requirements and Types of Clients

Clients with a Household AUM of \$2,000,000 or greater are automatically enrolled in Rosenbaum Financial's wrap fee program. For the purpose of this Section, "Household AUM" shall be defined as the total AUM of all accounts of any blood relatives or relatives by marriage that are living in the primary residence listed on the new account form or their children that are not living at the primary residence because they are living away at school and have not yet attained the age of 25. Household AUM can also be defined through an affiliation with a business client, such as partners and/or executives of the same company. Client not qualifying to be automatically enrolled in Rosenbaum Financial's wrap fee program under the above criteria can be admitted to the wrap fee program in Rosenbaum Financial's sole discretion. Rosenbaum Financial generally provides investment advice to individuals, high net worth individuals, and entities.

Item 6 – Portfolio Manager Selection and Evaluation

- A** Investment advisor representatives of Rosenbaum Financial may act as the portfolio manager under a wrap fee program account. In circumstances where Rosenbaum Financial recommends separate account managers, we consider several factors including account size, risk tolerance, the opinion of each client and the investment philosophy of the selected registered investment advisor. The recommendation of the initial portfolio manager and or the replacement manager will be based on a number of factors including client service, customer satisfaction, and ease and efficiency of integration with other components of a Client's account. There are a number of qualitative and quantitative components of our evaluation of a manager. Qualitative components include, but are not limited to, size and effectiveness of analyst team, adherence to strategy objectives (style drift), clearly defined investment process and ability to clearly communicate the successes and failures of that process. Quantitative components include performance and fee structure. We strive to evaluate funds against an accurate peer group rather than a general market index. Other factors such as manager tenure and firm turnover will also factor into our decisions. The Chief Compliance Officer or other firm manager conduct regular portfolio performance evaluations where the performance of the portfolio being evaluated may be compared to other similarly managed accounts. Each portfolio evaluated may be evaluated based on its particular circumstances. Therefore, the portfolio performance evaluations of accounts may not be conducted on a uniform or consistent basis.
- B.** Investment advisor representatives of Rosenbaum Financial may act as the portfolio manager under a wrap fee program account. Rosenbaum Financial and its investment advisor representatives receive compensation as a result of your participation in the program. This compensation is not more than the amount Rosenbaum Financial and its investment advisor representatives would receive if you paid separately for investment advice, brokerage, and

other services. Related persons are subject to the same selection criteria as outside portfolio managers.

C Advisory Business.

Information regarding types of advisory services offered, how advisory services are tailored to individual needs of clients, and differences between the wrap fee program and separately managed accounts can be found in Item 4 above.

Performance-Based Fees and Side-By-Side Management.

Rosenbaum Financial does not charge any performance-based fees for its services and does not provide side-by-side management.

Methods of Analysis, Investment Strategies and Risk of Loss.

Rosenbaum Financial believes in a long-term, balanced, disciplined approach to investing. As such, we build globally diversified portfolios that include stocks, bonds, real estate, alternative assets, private partnerships, and cash. These asset classes are accessed via mutual funds, exchange traded funds, private partnerships and individual stock and bond issues. When used in a managed account, these mutual funds will be no-load or load waived share classes. Investing takes place within the context of the plan that is tailored to each client's unique situation. We develop a statement of investment policy with each Client, outlining the investment philosophy, management procedures, long-term goals, risk tolerance, and other factors as they pertain to the investor(s).

Our approach attempts to maximize risk adjusted returns. We are looking for investments or combinations of investments that will provide higher returns relative to the amount of risk assumed.

ROSENBAUM FINANCIAL CORE EQUITY PORTFOLIO (CEP)

Clients who desire core equity growth as a long term piece of their portfolio will often participate in a group of mutual funds we select and monitor. These combinations of funds and ETFs are carefully researched and selected based on historical and expected future net performance, risk adjusted returns, manager and team interviews and tenure and adherence to stated objectives among many other factors. The funds and markets they represent are evaluated at least annually and rebalanced at the same time. The combination of equities represented will provide access to many markets the combination of which, over time, we believe will provide the opportunity for a more stable portfolio and higher returns.

The CEP may or may not include investment to the following market segments:

- Large, mid, small, micro – growth & value-United States
- Developed international, emerging markets, developed small cap, individual countries-International
- Commodities
- High yield bonds
- Private equity

- Private Partnerships
- Global infrastructure
- Domestic and international real estate
- Utilities
- Timber
- Master Limited Partnerships
- Structured Products such as customized Barrier Notes
- Hedging positions*

*Other categories may be added as market conditions warrant

ROSENBAUM FINANCIAL CORE BOND PORTFOLIO (CBP)

For a core fixed income portfolio, we apply many of the same principals used in the construction of our equity portfolios. Fixed income investments are subject to a number of different types of risks, including but not limited to: credit, interest rate, and reinvestment risks. This diversified portfolio is an attempt to mitigate the impact of any one of these risk.

The CBP may or may not include investments in the following market segments:

- Varying Durations- Long, Mid, Short
- Corporate
- Governments
- High Yield
- Bank Loan
- Convertible
- Inflation Protected
- International – Developed and Emerging
- Mortgage Backed
- Asset Backed
- Floating Rate
- Alternative – long/short*

*Other categories may be added as market conditions warrant

We also may supplement client portfolios with hedged equity positions if we need to reduce the risk of a portfolio to meet the individual client's needs. These portfolios are constructed to attempt to mitigate downturns, recognizing that in rising markets there will be a cost for the risk management.

The Hedged Equity portfolios may or may not include investments in the following market segments:

- Long/Short

- Market Neutral
- Arbitrage
- Tactical or Strategic Allocation
- Managed Futures
- Absolute Return Strategies

A portion of these portfolios may also be invested in a proprietary tactical allocation model based on historical valuations, price movement, momentum, and market breadth.

We primarily use mutual funds and ETF's for all of the above investments. We research fund information using both trusted third party sources and interviews and questionnaires completed by the funds parent companies when appropriate. The main sources of information we rely upon when conducting our research and analysis are sophisticated Morningstar databases, financial information provided by leading national and international institutions, and outside experts we pay for modeling and investment selection expertise.

We use our best judgment and good faith efforts in rendering services to Client. We cannot warrant or guarantee any particular level of account performance, or that accounts will be profitable over time. Not every investment recommendation we make will be profitable. Investing in securities involves risk of loss that Clients should be prepared to bear. Clients assume all market risk involved in the investment of account assets. Investments are subject to various market, currency, economic, political and business risks.

Except as may otherwise be provided by law, we are not liable to Clients for:

- any loss that Clients may suffer by reason of any investment recommendation we made with that degree of care, skill, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; or
- any independent act or failure to act by a custodian of Client accounts.

It is the responsibility of the Client to give us complete information and to notify us of any changes in financial circumstances or goals.

You should consider the following high-level summary of investment risks. This list is not intended to be an exhaustive description of all risks you may encounter in engaging our firm for advisory services. We encourage you to inquire with us frequently about the risks related to any investments in your account.

Risk of Loss. Securities investments are not guaranteed, and you may lose money on your investments. As with any investment manager that invests in common stocks and other equity securities, our investment recommendations are subject to market risk—the possibility that securities prices will decline over short or extended periods of time. As a result, the value of your account(s) will fluctuate with the market, and you could lose money over short or long periods of time. You should recognize whenever you determine to invest in the securities markets your entire investment is at risk. Clients should not invest money if they are unable

to bear the risk of total loss of their investments.

Market Risk. The value of your portfolio may decrease if the value of an individual company or multiple companies in the portfolio decreases or if our belief about a company's intrinsic worth is incorrect. Further, regardless of how well individual companies perform, the value of your portfolio could also decrease if there are deteriorating economic or market conditions. It is important to understand that the value of your investment may fall, sometimes sharply, in response to changes in the market, and you could lose money. Investment risks include price risk as may be observed by a drop in a security's price due to company specific events (e.g. earnings disappointment or downgrade in the rating of a bond) or general market risk (e.g. such as a "bear" market when stock values fall in general). For fixed-income securities, a period of rising interest rates could erode the value of a bond since bond values generally fall as bond yields go up. Past performance is not a guarantee of future returns.

Third Party Money Manager ("TPMM") Risk. A TPMM's past track record of success cannot be relied upon as a predictor of success in the future. In addition, the underlying holdings of your TPMM account(s) are determined by the TPMM directly, and may change overtime without advance warning to us, creating the potential for overlap with other investments held in your account. This increase in the correlation of your holdings will increase the risk of loss where the value of any overlapping holdings should decrease. There is also a risk that a TPMM may deviate from the stated investment mandate or strategy of the account, which could make the holding(s) less suitable for the client's portfolio. Our firm does not control any TPMM's daily business and compliance operations, and thus our firm may be unaware of any lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Private Investment Risk. Your participation in any privately offered investments or purchase of any privately offered securities involves a substantially higher degree of risk and is generally more speculative than investments in publicly offered (registered) securities. Private investments may include privately offered real estate investment trusts, Delaware Statutory Trusts, private equity funds, hedge funds, commodity pools, and other similar investment vehicles. Private investments are not appropriate for all clients and may be entirely illiquid. You should be financially capable of accepting an extremely high degree of risk and should have significant resources beyond those invested in any private investment(s). Stated differently, your private investments should purely represent "risk capital" within your overall portfolio, the complete loss of which would have an immaterial and insubstantial effect on your overall financial circumstances and financial goals. Clients should carefully review any disclosure documents, operating agreements, subscription materials, private placement memoranda, prospectuses and similar documentation provided by the issuers of private securities with their independent legal and tax advisors before investing.

Voting Client Securities.

Without exception, we do not vote proxies on behalf of Clients. We do not have authority to vote Client securities. Clients will receive proxies and other solicitations directly from the custodian or transfer agent. If any proxy materials are received on behalf of a Client, they will be sent directly to the Client or a designated representative of the Client, who is responsible to vote the proxy. Rosenbaum Financial may provide recommendations on how to vote proxies to Clients; however, Clients are never obligated to act on such recommendation.

Item 7 – Client Information Provided to Portfolio Managers

Once the client selects an investment advisor representative and an advisory relationship is initiated, the investment advisor representative will obtain information from the client on the client's financial background, prior investment experience, investment objectives, goals and restrictions, if any, and risk tolerance, among other things. This information is shared with any separate account manager selected by the client.

Item 8 – Client Contact with Portfolio Managers

Rosenbaum Financial does not place any restrictions on its client's ability to contact and consult with their portfolio managers.

Item 9 – Additional Information

A Disciplinary Information.

Rosenbaum Financial is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our firm, or the integrity of our management. No principal or person associated with Rosenbaum Financial has any information to disclose which is applicable to this Item.

Other Financial Industry Activities and Affiliations.

Rosenbaum Financial may, on occasion, recommend that all or a portion of a Client's assets be managed by an unaffiliated investment manager or sub-advisor. Fees charged by a sub-advisor will be fully disclosed to Clients. Sub-advisory fees may be deducted directly from Client accounts and may result in increased fees to Client. In all discretionary accounts, except to the extent the Client directs otherwise, we are authorized to use our discretion in selecting or changing a sub-Advisor and/or outside money manager to the account without prior approval from a Client. Clients may be required to execute a limited power of attorney with a sub-advisor selected by us.

Rosenbaum Financial may, on occasion, provide consulting services to qualified and non-qualified retirement plans including 401(k), Profit Sharing, and Defined Benefit Plans where investment advisory Clients are trustees of those plans. To fulfill our fiduciary duty, Clients are informed that they are under no obligation to use any individual associated with Rosenbaum Financial for these consulting services, and that they may use any firm, entity or agent they choose for these services.

Rosenbaum Financial may, on occasion, provide to its Clients business succession consulting. As fiduciaries we must act primarily for the benefit of investment advisory Clients. As such, we will only provide Clients business succession consulting services when fully disclosed, suitable, and appropriate. Clients are informed that they are under no obligation to use any individual associated with Rosenbaum Financial for business consulting services. Clients may use any firm, entity or agent they choose for these services.

Insurance related business is transacted with advisory Clients, and individuals may receive commissions from products sold to Clients. Clients are advised that the fees paid to

Rosenbaum financial for investment advisory services are separate and distinct from the commissions earned by any individual for selling Clients insurance products. If requested by a Client, we will disclose the amount of commission expected to be paid.

The receipt of commissions by an affiliated entity or individuals associated with the firm presents a conflict of interest. As fiduciaries we must act primarily for the benefit of investment advisory Clients. As such, we will only transact insurance related business with Clients when fully disclosed, suitable, and appropriate. Further, we must determine in good faith that any commissions paid to our representatives are appropriate. Clients are informed that they are under no obligation to use any individual associated with Rosenbaum Financial for insurance products or services. Clients may use any insurance or brokerage firm or agent they choose.

B Code of Ethics, Participation or interest in client transactions and personal trading.

Rosenbaum Financial has a Code of Ethics which all employees are required to follow. The Code of Ethics outlines our high standard of business conduct, and fiduciary duty to Clients. The Code of Ethics includes provisions relating to the confidentiality of Client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things.

A copy of the code of ethics is available to any Client or prospective Client upon request by contacting Mark Rosenbaum at (503) 352-1300 or mark@rosenbaumfinancial.com.

We do not own or manage any companies or investments that we advise our Clients to buy.

Rosenbaum Financial or individuals associated with our firm may buy and sell some of the same securities for their own account that Rosenbaum Financial buys and sells for its Clients. When appropriate we will purchase or sell securities for Clients before purchasing the same for our account or allowing representatives to purchase or sell the same for their own account. In some cases, Rosenbaum Financial or representatives may buy or sell securities for their own account for reasons not related to the strategies adopted for our Clients. Our employees are required to follow the Code of Ethics when making trades for their own accounts in securities which are recommended to and/or purchased for Clients. The Code of Ethics is designed to assure that the personal securities transactions will not interfere with decisions made in the best interest of advisory Clients while at the same time, allowing employees to invest their own accounts.

Rosenbaum Financial will disclose to advisory Clients any material conflict of interest relating to us, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

As any advisory situation could present a conflict of interest, we have established the following restrictions to ensure our fiduciary responsibilities:

1. A director, officer, associated person, or employee of Rosenbaum Financial shall not buy or sell securities for his personal portfolio where his decision is substantially derived, in whole or in part, by reason of his employment unless the information is

also available to the investing public on reasonable inquiry. No person of Rosenbaum Financial shall prefer his or her own interest to that of the advisory Client.

2. Rosenbaum Financial maintains a list of all securities holdings for itself and for anyone associated with its advisory practice that has access to advisory recommendations. An appropriate officer of Rosenbaum Financial reviews these holdings on a regular basis.
3. Any individual not in observance of the above may be subject to termination.

Review of Accounts.

Accounts are reviewed by Mark Rosenbaum who is responsible for overseeing all regulatory compliance for the firm. The frequency of reviews is determined based on the Client's investment objectives. Accounts are generally reviewed quarterly, but in any event, no less than annually.

More frequent reviews may be triggered by a change in Client's investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in the economic climate.

Investment advisory Clients receive standard account statements from the custodian of their accounts on a monthly basis or quarterly if there is no activity in the account. Rosenbaum Financial also provides Clients with a written report summarizing the account activity generally quarterly, but in any event, no less than annually.

Client Referrals and Other Compensation.

Generally speaking, we will recommend that Clients establish brokerage accounts with TD Ameritrade Institutional is a division of TD Ameritrade Inc., ("TD Ameritrade"), a registered broker-dealer and member FINRA/SIPC, so long as they continue to meet the above criteria. We participate in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through its participation in the Program.

We work with primarily these broker dealers for administrative convenience and also because these broker dealers offer a good value to our Clients for the transaction costs and other costs incurred.

As disclosed above, we participate in TD Ameritrade's institutional customer program and we may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our Clients, although we receive economic benefits through our participation in the program that is typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); 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, research, technology, and practice management products or services provided to us by third-party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through the program may benefit us but may not benefit its Client accounts. These products or services may assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop its business enterprise. The benefits we receive or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, our endeavors at all times are to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our decision to use TD Ameritrade for custody and brokerage services. We receive from TD Ameritrade Institutional a division of TD Ameritrade, Inc., ("TD Ameritrade") certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program.

TD Ameritrade provides the Additional Services to us at its sole discretion and at its own expense, and we do not pay any fees to TD Ameritrade for the Additional Services. We have entered into a separate agreement ("Additional Services Addendum") with TD Ameritrade to govern the terms of the provision of the Additional Services.

Our receipt of Additional Services raises potential conflicts of interest. By providing Additional Services to us, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, our Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with us, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, we may have an incentive to recommend to our Clients that their assets under management be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Our receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek the best execution of trades for Client accounts.

From time to time, we are provided marketing and due diligence support by Fund companies. Typically that support is in the form of funds used to defray costs associated with client dinner events and travel costs associated with certain investment due diligence trips. The client dinner events and due diligence may be used to benefit and service all or a substantial number of Rosenbaum Financial's accounts, including accounts not holding any Fund company equities. Our receipt of this additional compensation does not diminish our duty to act in the best interests of our Clients.

Financial Information.

Rosenbaum Financial does not collect more than \$1,200, more than six months in advance of services from any Client.

Rosenbaum Financial does have discretionary authority over Client funds or securities, but we have no financial commitments that would impair our ability to meet contractual and fiduciary commitments to Clients.

Neither Rosenbaum Financial, nor any of the principals, have been the subject of a bankruptcy petition at any time in the past.