

DISCLOSURE BROCHURE

PREPARED IN COMPLIANCE WITH
THE INVESTMENT ADVISERS ACT OF 1940 RULE 204-3(A)



Wealth Management, LLC

"Your wealth and life in perfect balance."

IARD #: 146967

FMR Wealth Management, LLC
REGISTERED INVESTMENT ADVISOR

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This Disclosure Brochure provides information about the qualifications and business practices of FMR Wealth Management, LLC, which should be considered before becoming a client. Please contact Ms. Pamela S. Ghezzi if you have any questions about the contents of this brochure.

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator.

BROCHURE
DATED
8
APRIL
2010

TABLE

of contents

Executive Summary	3
Who We Are	3
Our Mission	3
What We Do	3
Wealth Management Services	5
Wealth Management Composition	5
The Wealth Management Process	6
Wealth Management Fees	6
Termination of Wealth Management Services	7
Investment Management Services	8
Portfolio Management	8
Portfolio Monitoring	11
Qualifications & Advisory Responsibilities	12
Business Qualifications	12
Account Responsibility	12
Education & Business Standards	13
Method of Analysis, Sources of Information & Investment Strategies	13
Other Business Activities	13
Financial Industry Activities & Affiliations.....	15
Brokerage Affiliations	15
Insurance Company/Agency Affiliations	15
Disclosures & Conflicting Interests.....	16
Client Transactions	16
Investment or Brokerage Discretion	17
Additional Compensation	18

Material Changes

April 8, 2010 – We have moved our office for client meetings from 1155 Louisiana Avenue, Suite 204 in Winter Park to an executive office complex in Orlando. The new address is indicated on the cover of this Disclosure Brochure along with the new contact phone numbers.

EXECUTIVE

summary

WHO WE ARE

FMR Wealth Management, LLC (hereinafter referred to as “the Company”, “we”, “us” and “our”) is a Registered Investment Advisor¹ focused on assisting you and your family – including any business entity (profit or non-profit) – to pursue success and fulfillment in both your personal and financial life. We restrict the number of clients we serve to maintain a close, professional relationship, allowing us the time and resources to help you connect the wholeness of your wealth to your legacy.

OUR MISSION

It is our conviction that success, achievement, and contentment in life have little correlation to material wealth but are instead related to wise lifestyle choices. These lifestyle choices are your unique fundamental core values (e.g., intellectual, spiritual, family, financial, and philanthropic). As a result, at times the advice we offer may have little to do with your financial assets but rather what is best for you and your family. Therefore, it is this conviction that defines our mission:

“To diligently pursue the highest standards of fiduciary duty, and to hold in trust your financial goals and objectives as if they were our own; to serve as your advocate, assisting you with navigating the maze of financial alternatives and discerning offers of false promise and those that are inconsistent with your expectations.”

WHAT WE DO

We offer a unique planning process, followed by coordinated long-term solutions that stress disciplined lifestyle choices, leading to healthy financial decisions. This process is interactive, so the plans we design for you reflect how *you* define true wealth, not us.

As we evaluate your unique values, life goals, and plans there are four economic components we will consider before providing financial advice. These components are sensitively linked; if the balance of these components is weighted too heavily in one direction, then the impending results may adversely affect you. What we seek to do is examine your total financial situation to determine how any financial advice might impact the stability of these components, and then advise you based on the scenario most likely to prevent such imbalances from occurring.

These four components are:

- ❖ **Income** – Employment, investment income, windfall/inheritance, social security, and pension income.
- ❖ **Household Expenses** – Housing, utilities, transportation, insurance, education, debt repayment, taxes, and other expenses including entertainment.

¹ The term “registered investment advisor” is not intended to imply that FMR Wealth Management, LLC has attained a certain level of skill or training. It is used strictly to reference the fact that we are “registered” as an “investment advisor” with the Florida Department of Financial Services – and with such other regulatory agencies that may have limited regulatory jurisdiction over our business practices.

- ❖ **Assets** – Real estate, investments, other tangible property, and intangible property (e.g., skills, knowledge and abilities).
- ❖ **Liabilities and Net Worth** – Mortgages, credit cards, and other unsecured debts, automobiles, insurance, funded net worth and financial credit.

Therefore, we look at your lifestyle choices and financial goals as an interaction between your *income* and *household expenses*, your collection and management of *assets*, and your use and management of *liabilities and net worth*.

WEALTH

management services

Creating a wealth management roadmap is one of the most important services that successful people use to create an extraordinary personal life and business career. However it requires a long-term commitment, not only from us, the wealth strategist, but from you, as well. Our planning process helps to identify and/or clarify purpose, personal and family core values, needs, and priorities and align your financial decisions with your goals in all areas of your life. We recognize three primary life stages in our planning:

1. Financial Dependence/Asset Accumulation
2. Financial Independence/Asset Protection
3. Financial Transcendence/Family Legacy, Social Capital Legacy

Our wealth management process includes an evaluation of the investment and financial options available to you based upon your defined lifestyle choices. Planning includes: (i) attempting to make optimal decisions; (ii) projecting the consequences of these decisions for you in the form of a financial plan – a working blueprint; and, (iii) implementing the protocol to achieve the objectives of the plan. Once complete the plan is then used to compare future performance against the working blueprint.

WEALTH MANAGEMENT COMPOSITION

Our meetings with you will explore the following:

- ❖ Identify and clarify personal and family core values, mission, vision, and goals.
- ❖ Preparation of the Wealth Management Roadmap, which encompasses your:
 - Current financial situation.
 - Liquidity and asset preservation needs.
 - Wealth accumulation and growth.
 - Wealth distribution and transfer.

More specifically the wealth management roadmap may include, but is not limited to the following modules:

- Financial Statements – Cash Flow and Balance Sheet.
- Savings and Emergency Reserves.
- Asset Allocation and Investment Portfolio Analysis.
- Potential Income Tax consequences in collaboration with your tax advisor.
- Risk Management and Insurance Analysis.
- Retirement and Income Analysis.
- Long-Term Healthcare.
- Estate and Family Legacy Planning.
- Business Succession Planning.
- ❖ Outline of recommendations, strategies, solutions and resources.
- ❖ Prioritizing and implementing the written action plan.
- ❖ Introduction and personal orientation to our FMR Virtual Planner, your secure and encrypted, web-based planning tool with financial accounts aggregation and personal vault for private documents.

- ❖ Investment consultation utilizing our six step investment process that allows us to create and implement a customized investment strategy tailored to your long-term investment goals.
 - Introduction to our detailed, behavioral-risk assessment tool.
 - Prepare a professional investment proposal with a written Investment Policy Statement.
 - Access to our open-architecture platform with a variety of investment management solutions.
- ❖ Informative periodicals, market commentaries and research via e-mail and website.
- ❖ Facilitate meetings with you with advisors and/or specialists within our FMR Professional Network.
- ❖ Coordinate and facilitate meetings with family members, business associates, partners or other key individuals to assist with implementing your action plan.

THE WEALTH MANAGEMENT PROCESS

We incorporate the following financial planning components while working with you. This process has been set forth by the Certified Financial Planner Board of Standards, Inc.

1. Establishing and defining our relationship.
2. Gathering your personal data, including goals.
3. Analyzing and evaluating your financial status.
4. Developing and presenting financial planning recommendations and/or alternatives.
5. Implementing the financial planning recommendations.
6. Monitoring the financial planning recommendations.

WEALTH MANAGEMENT PLANNING FEES

The fee that we charge is bundled to incorporate the commitment of time and resources expected to gather, analyze, and summarize the plan and perform the services that you desire. The cost to design a wealth plan will not exceed \$16,000.00. Such fee will be fully disclosed in a Wealth Planning Agreement (“Agreement”), which will include the cost to review your financial information and prepare the desired wealth planning service. We will require full payment of the fee at the time the Agreement is signed².

It is important to note that any planning is kinetic (always in motion) and alive. A wealth management plan is a roadmap that is only as good as how well it reflects your current economic position to then guide you on a clear path to a future financial destination. However you can veer off course, intentionally or unintentionally, as circumstances in your life take you down another path. Our annual wealth management plan is designed to systematically address 13 wealth management topics to prepare for these unexpected diversions and continually keep you on the right road headed to your future financial destination.

Our annual wealth management planning service will not exceed \$10,000.00 and will be billed quarterly in advance. Wealth management planning services are all-inclusive should we manage portfolio assets in excess of \$500,000.

² The recommendations made in a wealth management plan are generally completed within 60 to 90 days from you signing the Agreement. However, implementing the plan using outside professionals (i.e., attorneys, CPAs, etc...) may require additional time that is out of our control. Therefore when we refer to the completion of the wealth management plan, we are referring to us (you and FMR Wealth Management, LLC) finalizing your financial benchmarks/objectives before approaching any outside professional.

TERMINATION OF WEALTH MANAGEMENT SERVICES

You are given five (5) full business days after entering into a Wealth Management Agreement in which to cancel and obtain a full refund.

After the five (5) waiting period, Wealth Management Services can be terminated at any time. However, we have the option to consider any refund of the planning fees paid for our time in: (i) meeting with you to get to know you and general communications to ensure a successful start of our relationship; (ii) the administrative services involved in gathering information and preparing initial planning documents; and, (iii) the design of any wealth management plans.

INVESTMENT

management services

Our Investment Management Services are designed to build long-term wealth while maintaining risk tolerance levels acceptable to you. We offer two Investment Management Service options based on your financial needs. These services include: (1) Portfolio Management; and, (2) Portfolio Monitoring.

I. PORTFOLIO MANAGEMENT

Our portfolio management approach incorporates your financial needs and investment objectives, time horizon, and risk tolerance, as outlined in your Investment Policy Statement, to yield an effective investment strategy. Your portfolio is then tailored to these unique investment parameters using equities (stocks), debt instruments (bonds), investment company products (mutual funds), and Exchange Traded Funds ("ETFs") to design your unique investment strategy.

In addition, depending on your risk tolerance, we may also recommend using the following investment vehicles to achieve your desired investment objective: leveraged index funds, closed-end funds, hedge funds, derivatives, private placements and other publicly traded securities.

Investment Strategy

We are not bound to a specific investment strategy or ideology for the management of your investment portfolio except for how such strategy might affect the risk tolerance levels we pre-defined for you during the getting-to-know-you process. However, our investment strategies generally incorporate these methodologies:

Modern Portfolio Theory

Modern Portfolio Theory ("MPT")³ is the analysis of a portfolio of stocks as opposed to selecting stocks based on their unique investment opportunity. The objectives of MPT is to determine your preferred level of risk then construct a portfolio that maximizes your expected return for that given level of risk. Our investment methodology follows five (5) basic premises, each of which is derived from MPT.

1. You, as with all clients, are inherently risk-averse.
2. The markets are basically efficient.
3. The focus of attention is shifted away from individual securities analysis to consideration of portfolios as a whole, predicated on explicit risk-reward parameters.
4. For any level of risk that you are willing to accept, there is a rate of return that should be targeted.
5. Portfolio diversification is not so much a function of how many issues are involved, but more a function of the relationships and proportions of each asset to its correlating asset.

³ Modern Portfolio Theory was developed and introduced by Harry M. Markowitz in his paper "Portfolio Selection" published in 1952 by the *Journal of Finance*.

Asset Allocation

Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. From this there are more narrow and aggressive Asset Allocation derivatives that we may use. Ultimately, the exact composition makeup and allocation of securities are determined by your investment parameters as set out in your Investment Policy Statement, which can compose a more detailed and/or complex structure.

Portfolio Management Fee

Our management fee represents the annual percentage charged for portfolio management provided on an asset-based fee arrangement. The fee for a quarter will be one-fourth of the annual percentage (i.e., $2.70\% \div 4 = 0.675\%$) multiplied by corresponding market value of the assets within the tier on the last business day of the previous calendar quarter. We retain discretion to negotiate the management fee under the maximum annual fee rate indicated for each tier on a client-to-client basis depending on the size, complexity, and nature of the portfolio managed.

ACCOUNT BALANCE*	ANNUAL FEE RATES
First \$100,000	1.50%
Next \$400,000.....	1.25%
Next \$500,000.....	1.00%
Over \$1,000,000.....	See Portfolio Monitoring

* The account minimum is typically \$100,000.00 smaller accounts may be accepted at our discretion.

Protocols for Investment Services

The following protocols establish how we handle our portfolio management accounts and what you should expect when it comes to: (i) your bill for investment services; (ii) withdrawing funds from your account(s); (iii) other fees charged to your account(s); and, (iv) termination.

Non-Discretion

We do not take discretion over the management of your portfolio. Prior to executing any securities transactions, we will contact you with our recommendation to get your consent on the trade(s). With regards to the Portfolio Strategists and Investment Managers, they, however, do establish trading authority to execute securities transactions at anytime without your consent or advice.

Billing

Your account will be billed quarterly in advance based on the account value on the last day of the previous calendar quarter. For the first billing quarter, if the management account was not opened at the beginning/end of the quarter, the fee will be based upon a prorated calculation of the aggregate market value of your assets to be managed for the period.

Advisory fees will be debited from free credit balances or money market fund balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees. Such liquidation may affect the relative balances of the account.

Fee Exclusions

The above fees for all our management services are exclusive of any charges imposed by the custodial firm, such as: (i) any Exchange/SEC fees; (ii) service or account charges, including, debit balances or postage/handling fees; and/or, (iii) transaction fees earned by the custodial firm for securities transactions.

In addition, all fees paid to us for management services are separate from any fees and expenses charged to shareholders of mutual fund shares by the investment company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as: 12b-1 fees and contingent deferred sales charges. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. You are encouraged to carefully read the fund prospectus.

Deposits and Withdrawals

Assets deposited by you into your account between billing cycles will not result in additional management fees being billed to you unless such deposits exceed \$25,000. Such deposits of this amount or greater, in most cases, will require modifications and adjustments to your investment allocation. Therefore, a pro-rata fee based upon the number of days remaining in the current quarterly period may be assessed to you for deposits exceeding the above amount.

For assets you may withdraw, we do not make partial refunds of your management fees. Just as with deposits, withdraws may require modifications and adjustments to be made in the account to correct your allocation of assets.

Termination Provisions for Investment Services

You have five (5) full business days after entering into an Investment Advisory Agreement to change your mind and cancel our investment services and not incur any management fee costs (custodial fees may still apply). In the event that termination occurs after the five (5) day waiting period, you will be entitled to a pro-rated refund of the prepaid quarterly management fee based upon the number of days remaining in the quarter after the termination notice goes into affect.

To terminate investment advisory services, either party (you or us) by written notification to the other party, may terminate the Investment Advisory Agreement at any time, provided such written notification is received at least 30 days prior to the date of termination. Such notification should include the date the termination will go into affect along with any final instructions on the account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity). Once the termination of investment advisory services has been implemented, neither party has any obligation to the other – we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.

II. PORTFOLIO MONITORING

For clients meeting our typical account minimum, we offer an open-architecture investment platform that engages third party Portfolio Strategists and Investment Managers who are charged with selecting the asset classes and deciding the right mix of stocks, bonds, and cash for your portfolio. To be considered for selection, these firms must:

- ❖ Have considerable expertise in asset allocation and portfolio strategy;
- ❖ Conduct substantial research across global capital markets;
- ❖ Have an investment policy committee comprised of senior investment professionals; and,
- ❖ Adhere to a defined and disciplined investment process.

Monitoring Services

As a team, we will take you through our six-step consulting process, which serves as the framework for understanding your financial circumstances and risk tolerance. This process allows us to create and implement a customized investment strategy tailored to achieve your desired objectives. Throughout this process we will continually monitor the progress of your investment portfolio, oversee the Portfolio Strategist's decisions to rebalance and realign your portfolio, and then clearly communicate changes to you.

Portfolio Strategists Fee Structure

The Portfolio Strategist who will be used to manage your account(s) will disclose their fees for management services in their Disclosure Brochure (the Portfolio Strategist's ADV Part II and/or Schedule H), which we will provide you prior to opening an account. The fees that will be charged to your account(s) will include:

1. The Portfolio Strategist's management fee;
2. Our monitoring fee (not to exceed 1.50%) that the Portfolio Strategist will pay us from their management fee, or we will bill for separately; and,
3. Trading commissions and/or account charges, depending on if the Portfolio Strategist is "wrapping" all the fees, which may be imposed by the custodian or broker/dealer used to custody your account(s).

The Portfolio Strategist's Disclosure Brochure contains all pertinent disclosures relating to their management services, fee structure for such services, and their termination provisions – you are encouraged to carefully review these disclosures.

QUALIFICATIONS

& advisory responsibilities

BUSINESS QUALIFICATIONS

Ms. Pamela S. Ghezzi is responsible for the leadership and direction of the Company, as well as, ensuring the investment activities are being performed to your expectations.

Ms. Ghezzi has over 14 years of professional experience consulting in the areas of investments, insurance and risk management. Ms. Ghezzi's education, qualifications, and professional experience include the following:

Ms. Pamela S. Ghezzi

CRD #: 2574193
Year of Birth: 1954

- Education:** University of Tennessee – B.S. (Cum Laude)
University of Central Florida – Postgraduate studies, Health Sciences Admin.
College for Financial Planning prerequisite courses
American Association of Long Term Care Insurance™
Long Term Care Professional
The Society of Certified Senior Advisors™
Certified Senior Advisor®
Life, Health & Variable Insurance Licenses (Florida)
FINRA Exams: Series 65, Series 6 & 63 (Both currently retired)
- Business:** 04/2008 – Present FMR Wealth Management, LLC
Position: Managing Member & Compliance Officer
- 04/2008 – Present FMR Management Resources, Inc.
Position: Consultant
- 03/1999 – 07/2008 Lincoln Financial Securities Corporation
Position: Registered Representative
- 03/1995 – 03/1999 MONY Securities Corporation
Position: Registered Representative

ACCOUNT RESPONSIBILITY

Each account is reviewed on an ongoing basis by Ms. Ghezzi to ensure that your needs and objectives are being met. All accounts are reviewed in the context of your stated investment objectives and guidelines. Any adjustments made to your predefined guidelines are dictated by your wealth management plan, Investment Policy Statement and cash needs.

You will receive at least quarterly statements from the brokerage firm where your account(s) are custodied. Each statement will summarize the specific investments currently held, the value of your portfolio, and account transactions. It is highly recommended that your wealth management plan be reviewed at least annually. Material changes in your personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, it is your responsibility to communicate these changes to us so that the appropriate adjustments can be made.

EDUCATION & BUSINESS STANDARDS

Any Investment Advisory Representatives retained by us will be required to have earned a four-year undergraduate degree or the equivalent and suitable experience in fields directly related to investments and financial planning, as well as the required examinations and qualifications to act as such.

METHOD OF ANALYSIS, SOURCES OF INFORMATION & INVESTMENT STRATEGIES

Method of Analysis

The method of analysis depends on your Investment Policy Statement, strategy and philosophy and/or the style of the Portfolio Strategist that you have asked us to monitor.

Sources of Information

We rely on numerous financial publications as well as independent research sources for information. Other sources may include, but are not limited to, domestic, international and governmental newspapers, bulletins, magazines, books and other publications. On occasion, we will use material prepared by investment companies and research releases prepared by other research companies.

Investment Strategies

We generally recommend long-term investment strategies requiring a minimum three-to-five-year time horizon. Also, the strategy used depends on the Portfolio Strategist you selected.

OTHER BUSINESS ACTIVITIES

Ms. Pamela S. Ghezzi devotes approximately 90% of her time to duties other than providing Wealth Management Services. Those businesses in which Ms. Ghezzi is involved are listed as follows:

- ❖ **Financial Management Resources, Inc.** – FMR is a trusted and experienced private advisory firm consulting with owners of closely held businesses in the areas of: owner succession/exit planning, income tax savings strategies, employer-sponsored retirement plans, and executive compensation. The FMR Team consists of disciplined and knowledgeable client service professionals who collaborate with CPA's and attorneys to provide their clients compelling solutions relevant to their goals. Ms. Ghezzi is a consultant for Financial Management Resources, Inc.
- ❖ **Independent Insurance Agency** - Ms. Ghezzi also maintains independent insurance licenses to sell various insurance products to you as part of a full range of financial services offered by the Company.

Even though Ms Ghezzi is involved in these other business activities, her ability to offer these other services is intended to enhance the wealth management planning services offered by the Company. However, we fully disclose potential conflicts of interest inherent in offering all of these services.



QUALIFICATIONS & ADVISORY RESPONSIBILITIES

In those instances where you become a client of ours and a client of one of these entities, referrals to and from these entities could be considered bias, and a conflict of interest. Ms. Ghezzi is a control person and an independent insurance agent, respectively, with the above named entities and is able to influence the direction of your investment activities. For more information, please refer to the "*Disclosures and Conflicting Interests*" section of this brochure.

FINANCIAL

industry activities & affiliations

BROKERAGE AFFILIATIONS

Shareholders Service Group, Inc.

The Company maintains a custodial relationship with Shareholders Service Group, Inc. ("SSG"), a licensed broker-dealer (member FINRA/SIPC) through their clearing firm Pershing, LLC.

SSG provides on-line services for account administrative and operational support, including electronic trading, account forms and applications, trading authorization, accounting and reporting, and other relevant administration and support services.

We are not a subsidiary of, or affiliated with SSG in any manner. We have sole responsibility for investment advice rendered, and advisory services are provided separately and independently from SSG.

INSURANCE COMPANY/AGENCY AFFILIATIONS

Ms. Pamela S. Ghezzi is licensed as a resident Life, Health, and (no-load) Variable Annuity Insurance Agent by the State of Florida and is licensed as a non-resident agent in other states. At your request, Ms. Ghezzi will periodically recommend life, disability, long-term health care insurance, and annuities, relevant to your goals and expectations. Ms. Ghezzi is currently the only RA licensed to sell insurance related products and earn commissions from the sale of these products.

DISCLOSURES

& conflicting interests

CLIENT TRANSACTIONS

We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or any of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

Participation or Interests

It is against our policies for Ms. Pamela S. Ghezzi, or any future owners, officers, or employees to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by Ms. Ghezzi, and such investment is not in violation of any SEC and/or State rules and regulations.

Ms. Ghezzi is permitted to personally invest her own monies in stocks (OTC and Listed), bonds, investment company products and other publicly traded securities, which may also be, from time to time, recommended to you. Such investment purchases are independent of, and are not connected in any way to, investment decisions made on your behalf. Personal trading activities conducted by our officers, directors and employees are monitored by Ms. Ghezzi to ensure that such activities do not impact upon your security or create conflicts of interest.

Insider Trading Activities

The Company is in compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988. The Company does not share any non-public information with anyone who does not need to know.

Code of Ethics

As a fiduciary, the Company has an affirmative duty to render continuous, unbiased investment advice, and at all times act in your best interest. To maintain this ethical responsibility to you, the Company has adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim, "Do the right thing!" The Company's Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

Proxy Voting

We are hereby expressly precluded from voting proxies. You understand and agree that you retain the right to vote all proxies, which are solicited for securities held in the managed accounts. Any proxy solicitations received at our place of business will be immediately forwarded to you for your evaluation and decision.

INVESTMENT OR BROKERAGE DISCRETION

Securities and Amount Bought or Sold

The new account form provided by Shareholders Service Group, Inc. ("SSG") authorizes us to view your account, bill our management fee, and to buy and sell securities. However, we do not take discretion over the management of your portfolio. Prior to executing any securities transactions, we will contact you with our recommendation to get your consent on the trade(s).

Direction of Transactions and Transaction Fees (Best Execution)

We have selected SSG as the custodian of choice based on their competitive transaction charges; our familiarity with SSG's trading platform, and on-line services for account administration and operational support. However, since we do not recommend, suggest or make available a selection of custodians, other than SSG for you to choose to custody your account(s), best execution may not always be achieved and you may pay higher transaction fees.

There will be no attempt by us to recommend SSG solely on the lowest transaction fees and related costs. Your investment needs, general reputation, trading capabilities, investment inventory, the financial strength, and our personal experience working with SSG has been considered, among other items, in suggesting SSG to you.

Selection of Portfolio Strategists

We will make available a select group of Portfolio Strategists in which you may choose to manage your account(s). We will assist you in determining which will provide the most effective financial growth based upon stated investment objectives and risk tolerance level.

While we have exercised our best efforts evaluating the investment performance and cost of service offered by these Portfolio Strategists, we make no representation that the Portfolio Strategists in which we may refer you have the best investment performance or have the lowest portfolio management costs. In addition, the selection of such Portfolio Strategists will be limited to those we have entered into service agreements. Therefore, it is possible that you might be able to contract for similar services elsewhere or separately with equal or better performance at lower cost.

ADDITIONAL COMPENSATION

Benefits & Conflicts between Affiliated Companies

As previously mentioned Ms. Pamela S. Ghezzi serves as a consultant to FMR Management Resources, Inc. In her capacity as a consultant, Ms. Ghezzi will recognize revenues if you are referred this company and you choose to engage them for service. Revenues could come in the form of advisory/consulting fees, a salary, and/or bonus rewards. This can present a conflict of interest, in that, such referrals create an incentive to only refer you to FMR Management Resources for some form of remuneration, thereby eliminating the possibility for you to be referred to someone who may provide better services at lower cost.

Notwithstanding such economic benefit and potential conflicts of interest we strives to serve your best interests, as well as ensuring such disclosure is being properly made to you in compliance with the Investment Advisor Act of 1940, Rule 275.206.

Financial Planning Economic Benefits & Conflicts

You are cautioned to consider your options carefully when Ms. Pamela S. Ghezzi, or any future Investment Advisor Representatives ("RA") of the Company, recommends the purchase of insurance products. Ms. Ghezzi is a licensed insurance agent and there is a potential conflict of interest. The implication on our part and Ms. Ghezzi is to recommend only those products in which she will receive a commission. Consequently, the objectivity of the advice rendered to you could be subjective and create a disadvantage.

In addition, there are also potential conflicts of interest when Ms. Ghezzi suggests the need for outside consultations and professional services (i.e., attorneys and other accountants, etc.) to implement certain aspects of an estate or wealth management plan. Even though we do not share in any fees earned by the outside professionals those persons to which we refer business do. This creates incentive on Ms. Ghezzi to refer your business to only those professionals that in turn refer potential new clients to us. This can eliminate the possibility for you to be referred to someone who may provide better services at lower cost.

Therefore, to ensure you understand the full relationship of Ms. Ghezzi to any related persons and outside parties that Ms. Ghezzi may refer business, as well as the choices and risks you have in receiving wealth management planning and investment management services, the following disclosures are provided:

- ❖ You do not have to accept our recommendation to use SSG as the custodian. However we may not be able to provide you complete institutional services if you elect to use another broker-dealer.
- ❖ Investments involve risk and some investment decisions will result in losses. You understand that we cannot guarantee that your investment objectives will be achieved by working with us.
- ❖ You are under no obligation to have any related parties that we recommend prepare planning documents (i.e., estate, tax, etc...). You are free to choose those outside professionals to implement the recommendations made in the financial or estate plan.
- ❖ If requested by you to implement any insurance recommendations made in the financial plan, Ms. Ghezzi will execute such transactions through those insurance companies in which she is a licensed insurance agent. In such cases, Ms. Ghezzi will receive the normal commissions associated with such insurance transactions.



- ❖ We do not receive any economic benefit from referring you to another professional without first notifying you of such possibilities. We act completely in a fiduciary capacity – **your interests are first and foremost.**

Notwithstanding such potential conflicts of interest, Ms. Ghezzi strives to serve your best interest; as well as, ensuring such disclosure is being properly made to you in compliance with the Investment Advisor Act of 1940, Rule 275.206.

END OF THE DISCLOSURE BROCHURE