

FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

OMB APPROVAL	
OMB Number	3235-0049
Expires	November 30, 2005
Estimated average burden hours per response. . .	.9.01

Name of Investment Adviser: NetInvestmentAdvisor.com, Inc.					
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
	P.O. Box 40052	Augusta,	GA	30909	404 550-0155

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any government authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

FORM ADV

Part II - Page 2

Applicant: NetInvestmentAdvisor.com, Inc.	SEC File Number: 801-61837	Date: 11/13/2009
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Definitions for Part II

Related person -- Any officer, director or partner of applicant or any person directly or indirectly controlling, controlled by, or under common control with the applicant, including any non-clerical, non-ministerial employee.

Investment Supervisory Services -- Giving continuous investment advice to a client (or making investments for the client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client's personal and family obligations.

1. **A. Advisory Services and Fees.** (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:		
<input type="checkbox"/>	(1) Provides investment supervisory services	_____ %
<input type="checkbox"/>	(2) Manages investment advisory accounts not involving investment supervisory services	_____ %
<input checked="" type="checkbox"/>	(3) Furnishes investment advice through consultations not included in either services described above	100%
<input type="checkbox"/>	(4) Issues periodicals about securities by subscription	_____ %
<input type="checkbox"/>	(5) Issues special reports about securities not included in any service described above	_____ %
<input type="checkbox"/>	(6) Issues, not as part of any services described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities	_____ %
<input type="checkbox"/>	(7) On more that an occasional basis, furnishes advice to clients on matters not involving securities	_____ %
<input type="checkbox"/>	(8) Provides a timing service	_____ %
<input type="checkbox"/>	(9) Furnishes advice about securities in any manner not described above	_____ %

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does the applicant call any of the services it checked above financial planning or some similar term? Yes No

C. Applicant offers investment advisory services for: (check all that apply):

- | | |
|--|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. **Types of Clients** -- Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|---|
| <input checked="" type="checkbox"/> A. Individuals | <input type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input checked="" type="checkbox"/> G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Applicant:

NetInvestmentAdvisor.com, Inc.

SEC File Number:

801- 61837

Date:

11/13/2009

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|--|---|
| <input checked="" type="checkbox"/> A. Equity Securities | <input type="checkbox"/> H. United States government securities |
| <input type="checkbox"/> (1) exchange-listed securities | |
| <input type="checkbox"/> (2) securities traded over-the-counter | <input type="checkbox"/> I. Options contracts on: |
| <input type="checkbox"/> (3) foreign issues | <input type="checkbox"/> (1) securities |
| | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | |
| <input type="checkbox"/> C. Corporate debt securities | <input type="checkbox"/> J. Futures contracts on: |
| (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> D. Commercial paper | |
| <input type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| | <input type="checkbox"/> (2) oil and gas interests |
| <input checked="" type="checkbox"/> G. Investment company securities | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (2) variable annuities | |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|--|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| (1) <input type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input type="checkbox"/> Company press releases |
| (4) <input type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Applicant: NetInvestmentAdvisor.com, Inc.	SEC File Number: 801-61837	Date: 11/13/2009
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5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No
 (If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- Name • formal education after high school
- year of birth • business background for the preceding five years

7. Other Business Activities. (check those that apply)

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

<input type="checkbox"/> (1) broker-dealer	<input type="checkbox"/> (7) accounting firm
<input type="checkbox"/> (2) investment company	<input type="checkbox"/> (8) law firm
<input type="checkbox"/> (3) other investment adviser	<input type="checkbox"/> (9) insurance company or agency
<input type="checkbox"/> (4) financial planning firm	<input type="checkbox"/> (10) pension consultant
<input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant	<input type="checkbox"/> (11) real estate broker or dealer
<input type="checkbox"/> (6) banking or thrift institution	<input type="checkbox"/> (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes No

(If yes, describe on Schedule F the partnerships and what they invest in.)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Applicant: NetInvestmentAdvisor.com, Inc.	SEC File Number: 801- 61837	Date: 11/13/2009
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9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

10. Conditions for Managing Accounts. Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes No

(If yes, describe on Schedule F.)

11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

In connection with utilizing NetInvestmentAdvisor.com's services, clients will complete an Investment Objectives Questionnaire containing questions regarding the client's financial situation, individual needs, and investment objectives. The questionnaire, and any changes or amendments made to it by the client, will become the basis for any recommended changes to the client's portfolio.

NetInvestmentAdvisor.com does not review client portfolios. Instead, all investment data is updated quarterly and clients are responsible for accessing the NetInvestmentAdvisor.com website to check for any recommended changes.

B. Describe the nature and frequency of regular reports to clients on their accounts.

NetInvestmentAdvisor.com does not issue any statements or reports. Clients receive statements directly from the custodian of their account.

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Applicant: NetInvestmentAdvisor.com, Inc.	SEC File Number: 801-61837	Date: 11/13/2009
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12. Investment or Brokerage Discretion.

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:
- | | | |
|--|---------------------------------|---|
| (1) securities to be bought or sold? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
| (2) Amount of the securities to be bought or sold? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
| (3) broker or dealer to be used? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
| (4) commission rates paid? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |

- B. Does applicant or a related person suggest brokers to clients? Yes No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4), or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the product, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|---------------------------------|---|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission) ; or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? Yes No

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Schedule F of Form ADV

Continuation Sheet for Form ADV Part II

Applicant: NetInvestmentAdvisor.com, Inc.	SEC File Number: 801-61837	Date: 11/13/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: NetInvestmentAdvisor.com, Inc.	IRS Empl. Ident. No.: 58-1884516
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Item of Form (identify)	Answer
Item 1.D.	<p>SERVICES</p> <p>The registrant, NetInvestmentAdvisor.com, Inc. (hereinafter "NIA") provides the following advisory services to its clients:</p> <p>NIA provides investment advice to individuals through consultation services and our interactive website, defined as giving investment advice to a client or making investment recommendations for a client based on the needs of the client. Through discussions / questionnaires in which goals and objectives based on a client's particular circumstances are established, NIA develops a client's investment plan according to the investment mandate and creates a recommended portfolio based on that plan.</p> <p>NIA will consult on accounts generally of the pension plan industry helping corporations with establishing 401k and similar plans. NIA will utilize its expertise as well as the expertise of sub-advisers in determining which investment options are best suited for the plan. NIA and/or its sub-adviser will also establish various asset allocation models for the employer, plan sponsor, and/or plan administrator to offer to plan participants. Model portfolio recommendations are offered on a non-discretionary basis and NIA has no supervisory or oversight responsibilities with regard to the assets invested in accordance with the model. NIA may offer additional tools through an interactive website to assist plan participants in assessing their risk profile and selecting an appropriate asset allocation model. These services may be provided through a direct relationship with the plan sponsor or through a third-party such as an administrator or consultant.</p> <p>In some circumstances, NIA may partner with various plan sponsors and/or plan administrators to offer asset allocation services to plan participants on a discretionary or non-discretionary basis. NIA may depend on sub-advisors to implement each investment strategy.</p> <p>FEE SCHEDULES</p> <p>All fees paid to NIA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees may include a management fee, other fund expenses, or a distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.</p> <p><u>Advisory Services for Individuals:</u></p> <p>NIA charges a quarterly fee of \$50 for the 1st service and \$25 each for additional service. Client has the option to add or delete services at anytime; the fee will be adjusted at that time. The fee charged is calculated as described above and is not charged on the basis of a share of capital gain upon or capital appreciation of the funds or any portion of the funds of an advisory client.</p> <p>A client agreement may be canceled at any time and for any reason by either party. Clients can terminate the agreement by accessing My Services on the NetInvestmentAdvisor.com website and un-checking the "Auto Renew" option. The account will be terminated as of the next quarterly billing period.</p> <p><u>Advisory Services for Plan Sponsors:</u></p> <p>There is no standard fee schedule for investment advisory services provided to plan sponsors. Fees are determined based on various factors specific to the plan, such as amount of assets, number of participants, and services provided by NIA. Fees may be based on assets under management, fixed fee, or any other means agreed upon by the parties.</p>

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant: NetInvestmentAdvisor.com, Inc.	SEC File Number: 801-61837	Date: 11/13/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: NetInvestmentAdvisor.com, Inc.	IRS Empl. Ident. No.: 58-1884516																								
Item of Form (identify)	Answer																								
Item 2G	<p>TYPES OF CLIENTS NIA assists associations and other organizations with developing and implementing 401(k) plans for members. Custodial and administrative services are offered by unaffiliated third parties. NIA subsequently provides investment advice to the participants of the plan.</p>																								
Item 5	<p>EDUCATION AND BUSINESS STANDARDS NIA requires any associated person involved in determining or giving investment advice to have applicable experience and fulfill any licensing and registration requirements.</p>																								
Item 6	<p>EDUCATION AND BUSINESS BACKGROUND</p> <table border="0"> <tr> <td>Eugene Howerdd, President/CEO</td> <td>DOB 11/13/34</td> </tr> <tr> <td>Georgetown University, BS Degree</td> <td>1956</td> </tr> <tr> <td>NetInvestmentAdvisor.com CEO/President</td> <td>2003-Present</td> </tr> <tr> <td>WMA Investment Advisors, President</td> <td>1996-2001</td> </tr> <tr> <td>Howerdd Financial Corporation, President</td> <td>1989-Present</td> </tr> <tr> <td>Round Hill Estates Inc., President</td> <td>1965-Present</td> </tr> </table> <table border="0"> <tr> <td>Katherine Howerdd Price, Vice President/Chief Compliance Officer</td> <td>D.O.B. 04/21/1959</td> </tr> <tr> <td>Mt. Vernon College</td> <td>1978-1980</td> </tr> <tr> <td>NetInvestmentAdvisor.com, VP/CCO</td> <td>2003-Present</td> </tr> <tr> <td>Howerdd Financial Corp., VP/Secretary</td> <td>2006-Present</td> </tr> <tr> <td>Round Hill Associates, VP/Secretary</td> <td>2003-Present</td> </tr> <tr> <td>Pinnacle Outdoor, Exec. Admin. Assistant</td> <td>1998-2003</td> </tr> </table>	Eugene Howerdd, President/CEO	DOB 11/13/34	Georgetown University, BS Degree	1956	NetInvestmentAdvisor.com CEO/President	2003-Present	WMA Investment Advisors, President	1996-2001	Howerdd Financial Corporation, President	1989-Present	Round Hill Estates Inc., President	1965-Present	Katherine Howerdd Price, Vice President/Chief Compliance Officer	D.O.B. 04/21/1959	Mt. Vernon College	1978-1980	NetInvestmentAdvisor.com, VP/CCO	2003-Present	Howerdd Financial Corp., VP/Secretary	2006-Present	Round Hill Associates, VP/Secretary	2003-Present	Pinnacle Outdoor, Exec. Admin. Assistant	1998-2003
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Items 7C	<p>OTHER BUSINESS ACTIVITIES Eugene Howerdd is the owner of Howerdd Financial Corporation a financial consulting and business development company which assists companies in designing and packaging financial products to offer to their clients, and assists financial product providers in the introduction and establishment of relationships with distribution networks. Compensation is on an annual retainer basis or as a percentage of provider's fee by the corporate client. Howerdd Financial Corporation may provide consulting services to entities that also have a business relationship with NIA.</p> <p>Mr. Howerdd is also the controlling stockholder in Round Hill Estates Inc., a family real estate holding and development company. Over the years, Round Hill Estates has developed and operated hotel, golf club and related properties as well as shopping centers and office properties.</p> <p>Mr. Howerdd may, at times, develop other businesses that may or may not be related to the advisory activities of NetInvestmentAdvisor.com. In the case where outside business activities pose a conflict to NetInvestmentAdvisor.com's clients, the conflicts will be adequately disclosed.</p> <p>Mr. Howerdd's past Board service includes directorships of banks (Federal Home Loan Bank of Atlanta, Barclays PLC US Board), financial consulting firms, hospitals (St. Joseph's Hospital of Augusta, GA, Highlands Cashiers Hospital of Highlands, NC), and the United States Golf Association Executive Committee.</p> <p>Katherine H. Price is also involved with the administration and operation of Eugene Howerdd's other business entities. Time spent on business activities for Eugene Howerdd and Katherine Price is, on average, 50% to NetInvestmentAdvisor.com and 50% to all other business activities collectively.</p>																								

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant: NetInvestmentAdvisor.com, Inc.	SEC File Number: 801-61837	Date: 11/13/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: NetInvestmentAdvisor.com, Inc.	IRS Empl. Ident. No.: 58-1884516
Item of Form (identify)	Answer
Item 9	<p>PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS NIA, its employees or other affiliated persons, (hereinafter "associated persons") may, for their personal accounts, buy or sell securities identical to those recommended to clients. Additionally, any associated person(s) may have a position in a certain securities which may also be recommended to a client. However, no associated person shall prefer his or her own interest to that of any advisory client. As these situations may represent a potential conflict of interest, NIA has established a Code of Ethics which includes certain provisions in order to protect the interests of clients and comply with Rule 204A-1 of the Investment Advisers Act of 1940.</p> <p>Personal Securities Transactions These requirements and restrictions apply to all personal securities transactions of the associated person and his/her immediate household. All access persons are required to file quarterly personal securities transactions reports and annual holdings reports to the CCO. All access persons are required to obtain pre-clearance from the CCO before participating in private placements or initial public offerings.</p> <p>NIA will provide a copy of the Code of Ethics upon written request to Katherine Price, CCO at P.O. Box 40052, Augusta, GA 30909.</p>
Item 12	<p>INVESTMENT OR BROKERAGE DISCRETION In many cases, NIA does not have investment or brokerage discretion over any accounts. For some clients, NIA may recommend which securities and the amounts of securities (represented as a percent of the overall total) to be bought or sold, but it is only a recommendation and the client may choose whether or not to act upon the recommendation.</p> <p>Where NIA does have discretionary authority to execute client transactions, NIA depends on the services of a sub-adviser to implement the client's investment strategy. Nonetheless, all transactions are executed through the broker also acting as custodian for the client account. Because of the nature of the accounts, NIA may not have the ability to recommend the use of any other custodian or broker.</p>
Other	<p>PROXY VOTING NIA does not vote proxies for clients.</p> <p>COMPLIANCE PROGRAMS In compliance with Rule 206(4)-7 of the Investment Advisers Act of 1940, NIA has appointed a Chief Compliance Officer, adopted policies and procedures reasonably designed to prevent violations of federal securities laws, and will review the policies and procedures for their adequacy and effectiveness at least annually.</p> <p>PRIVACY POLICY The SEC adopted Regulation S-P, a comprehensive set of rules intended to implement privacy requirements aimed at preventing financial institutions from disclosing various types of non-public personal information gathered from individual clients to certain unaffiliated entities. A copy of NIA's privacy policy is posted on the website.</p>

NetInvestmentAdvisor.com, Inc.

Sub-Advisor Documents

Horizon Investments, LLC Privacy Policy

Horizon Investments, LLC Disclosure Documents

Horizon Investments LLC Customer Privacy Information

Horizon Investments does not disclose any non-public information about you to non-affiliated third parties unless:

- Authorized by you;
- To protect the confidentiality or security of our records pertaining to you, with regards to any service, product or transaction;
- To protect against or prevent actual or potential fraud, unauthorized transaction, claims, or other liability;
- To persons holding a legal or beneficial interest relating to you;
- To persons acting in a fiduciary or representative capacity on behalf of you;
- To respond to judicial process or government regulatory authorities;
- To comply with Federal, State, or local laws, rules or other applicable legal requirements and;
- To comply with a properly authorized civil, criminal, or regulatory investigation, or subpoena or summons by Federal, State, or local authorities.

Horizon Investments collects non-public information from:

- You on applications or other forms;
- Information about your transactions with our affiliates, others, or us.

Horizon Investments has internal security procedures to protect non-public information as follows:

- Except as otherwise described in this Notice, we restrict access to your non-public personal financial information to our employees who need to know to provide our services to you as permitted by law.
- We maintain physical, electronic, and procedural safeguards that comply with legal requirements to guard your non-public personal financial information. We have installed usernames, passwords, and other safety features on our web site applications to protect your data.
- If you close your account(s) or become an inactive client, we will continue to adhere to the privacy policies and practices as described in this Notice.

You do not need to do anything in response to this notice.
This notice is merely to inform you about our privacy policies and practices.

Horizon Investments, LLC
INVESTMENT ADVISOR BROCHURE
Dated March 4, 2009

I. Advisor Services and Fees

Horizon Investments, LLC ("Horizon") is in the business of providing investment advice and supervisory services to individuals, 401(k) plans, pension and profit sharing plans, trusts, estates, charitable organizations and corporations. Horizon predominately gives allocation advice on the purchase and sale of mutual funds.

Horizon performs individual account management services for a percentage of assets under management. The fees are generally as follows: Up to .50% per quarter for the first \$20,000,000 under management. **However, these fees are negotiable.** Horizon generally would like the minimum account size to be \$25,000 (although Horizon reserves the right in its sole discretion to accept accounts of a smaller size).

Clients are billed directly or alternatively they can authorize Horizon to deduct fees from (i) their account(s) held at a third party custodian or (ii) their checking account via ACH draft. Horizon will provide clients and the custodian with a fee statement. Fees owed are calculated on January 1, April 1, July 1 and October 1 of each year. Horizon's fees are deducted in arrears, except for fees collected for services sub-advised by Principal Guard, LLC, which are collected annually in advance and are **NON-REFUNDABLE**. Horizon also manages 401(k) plans and its fees for each such plan are negotiated at the time with the plan sponsor and other related parties.

In addition to fees paid to Horizon, each custodian also charges various fees based on account maintenance (custodial) issues including transaction costs, transfers, withdrawals, and termination. These fees will be disclosed in the custodian contracts and related documents. Each custodian may also collect additional revenue from the mutual fund families in which client accounts are invested, such as 12b-1 distributions, to offset custodial charges.

Horizon also manages subaccounts (funds) pursuant to variable annuity contracts with some clients. Variable annuities are primarily insurance products with a variety of fees including fees associated with the riders and options which are selected by annuitants and disclosed in each variable annuity contract.

Horizon also makes its trading signals available to other investment advisors. Horizon can customize its trading signals for other advisory firms. Horizon's fees for providing these signals are negotiable and vary from client to client. The minimum fee is \$20,000.

Horizon has contracted with Founders Financial Securities, LLC (an investment advisor registered with the SEC pursuant to the Investment Advisers Act of 1940, as amended), to provide Horizon with investment advice, analysis and consultation concerning the management of various client's assets managed using Horizon's Freedom Portfolios (freedomAggressive, freedomGrowth, freedomModerate, freedomConservative and freedomPreservation). Founders Financial Securities, LLC receives sub-advisory fees (equal to .125% of the client's assets under management), which is deducted and paid from Horizon's advisory fees.

Horizon has also contracted with Principal Guard, LLC (an investment advisor registered or in the process of registering with the State of North Carolina), to provide Horizon with investment advice, analysis, consultation and transactional support concerning the management of various client's assets managed using the Horizon Lifetime Income Strategy and the Traditional Enhanced portfolios. Principal Guard, LLC receives a sub-advisory fees (equal to .25% of the client's assets under management), from Horizon from the Program Fee (applicable to the Horizon Lifetime Income Strategy and Traditional Enhanced portfolios), which is collected by Horizon annually in advance. This fee is **NON-REFUNDABLE**

II. Types of Clients

Horizon performs investment advisor services for individuals, 401(k) plans, pension and profit sharing plans, trusts, estates, investment companies, charitable organizations, corporations, and other business entities including both taxable and tax-exempt entities.

III. Types of Investments

Horizon is in the business of trading and giving advice on mutual funds, and variable annuities subaccounts, variable life insurance subaccounts, exchange-listed securities and funds, securities traded over-the-counter, US Treasury Security, Fixed income products, commercial paper, and other various investment products from time to time.

IV. Methods of Analysis, Sources of Information, and Investment Strategies

Horizon's team incorporates analysis from both a quantitative and economic perspective. The research-driven methodology produces market trajectories to be used in Horizon's active asset allocation framework. Horizon utilizes high-frequency data to obtain leading indicators of future market activity and to identify current trends in market leadership. This analysis also incorporates the global weights for geography, size, and style and then modifies the global weights based on the current economic environment. Industry overweights are determined based on the underlying support for the specific sectors as well as quantitative allocation research.

Horizon's research is used in conjunction with other sources of information such as financial newspapers, public economic news, Bloomberg, the Morningstar database of mutual funds, prospectuses, company press releases, and interviews with mutual fund managers

The application of Horizon's strategy can involve short term trading. Mutual fund short sales can occur.

Horizon also has the ability to provide a principal protection strategy as an overlay to its strategies utilizing Principal Guard, LLC as a sub-adviser.

V. Education and Business Standards

Horizon requires that all employees and solicitors acting on behalf of Horizon be in full compliance with all state and federal laws.

VI. Education and Business Background of Investment Advisor

Robert J. Cannon, President and Chief Executive Officer, graduated from Furman University in 1994 with a Bachelor of Arts degree in Political Science. He has been in various capacities with Horizon since 1999 including trading, operations, and marketing. He along with Mr. Johnson is a co-founder of Horizon Investments LLC. Mr. Cannon is a managing member. Mr. Cannon was born in 1972.

Kevin W. Blocker, Director of Research and Development, graduated from Wofford College with Bachelors degrees in Computer Science, Spanish and Mathematics in 2000. He has been with Horizon in an analyst role since February 2001. He is a Chartered Alternative Investment Analyst. Mr. Blocker was born in 1978.

Jeffrey J. Roach, Ph.D., Chief Economist, joined Horizon Investments, LLC in September 2006 and was previously a Senior Economist with Bank of America Corporate Investments. Mr. Roach also worked as a financial analyst at Plastic Omnium Industries and as a valuation specialist with the Actuarial Department of Liberty Life Corporation. Jeff holds a B.S. in Mathematics from Bob Jones University, an M.A. in Economics from Clemson University and a Ph.D. in Economics from Clemson University. Mr. Roach was born in 1973.

Thaddeus W. Cook, General Counsel and Chief Compliance Officer, joined Horizon Investments, LLC in September of 2005 and was previously an attorney for Bank of America, NA representing the global corporate and investment bank of Banc of America Securities LLC with respect to fixed income assets and high yield special situations. Tad holds a B.A. in Criminal Justice from University of North Carolina at Charlotte and a J.D. from Thomas M. Cooley Law School. Mr. Cook was born in 1962.

VII. Other Business Activity

Horizon is not currently engaged in any other business activity.

VIII. Other Financial Industry Activities or Affiliations

Horizon is neither a Broker/Dealer nor a custodian. Horizon uses Trust Company of America, Charles Schwab & Co. Inc., Prudential Annuities, ING, Allianz, Jackson National, MG Trust Company, DWS Scudder, Zurich Life Insurance Company, Transamerica and Security Benefit Group for the purpose of effecting client transactions. Custodians, other than the annuity product platforms, are formally reviewed by Horizon for best execution and service considerations annually.

IX. Participation or Interest in Client Transaction

Horizon has adopted a Code of Ethics which sets forth Horizon's policy concerning this and other issues. Horizon's Code of Ethics is available upon request. The Company's Code may also be viewed online at www.horizoninvestments.com.

X. Conditions for Managing Accounts

Horizon's minimum account size for individual separate is \$25,000 (although Horizon reserves the right in its sole discretion to accept accounts of a smaller size).

XI. Review of Accounts

The Management Committee meets regularly to review transactions and allocation models. Individual clients' accounts are screened for allocation differences and rebalancing. Mr. Cannon, Mr. Blocker, and Mr. Roach comprise the Investment Committee.

Clients receive a monthly and/or quarterly statement from their respective custodian summarizing all trades made during the month or quarter, client's balance, cash or margin, and the amount of fees paid from the clients accounts. If requested, and agreed upon by Horizon, the client may receive more frequent reports.

XII. Investment or Brokerage Discretion

Horizon has full discretion with respect to the purchase and sale of investment instruments in the client's account and the amounts of such purchases or sales (except in instances when Horizon is the Sub-advisor or a signal provider.) Horizon does not consult clients regarding account transactions. Horizon has the authority to select the Broker/Dealer to be used in effecting trades in clients' accounts. The client pays all transaction fees incurred in the trading of client's assets.

XIII. Additional Compensation

Horizon has entered into solicitor relationships with other investment advisers, broker-dealers, and financial planning firms and shares advisory fees with solicitors on a negotiated basis for soliciting business for Horizon. This split fee is paid in arrears and in most instances continues to be paid to solicitors for as long as Horizon receives fees on the account.

XIV. Code of Ethics

In order to provide an understanding of Horizon's standards for meeting our fiduciary responsibility to clients, Horizon has developed a Code of Ethics that must be adhered to by all of its employees. This Code sets forth standards of conduct expected of advisory personnel and addresses conflicts that arise from personal trading by advisory personnel. This code includes limitations on personal trading by employees, reporting requirements for employee's securities holdings and personal securities transactions, and insider trading policies and procedures. A copy of the Company's Code of Ethics is available to clients and potential clients upon request. The Company's Code may also be viewed online at www.horizoninvestments.com.