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This brochure provides information about the qualifications and business practices of Hebert Advisory Services, Inc.

If you have any questions about the contents of this brochure, please contact us at 303-986-9110 or 1-800-642-0269 or via email at: Info@hebertadvisory.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Hebert Advisory Services, Inc. also is available on the SEC's website at: www.adviserinfo.sec.gov.

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

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Item 4: Advisory Business:**4A: Firm Description:**

Hebert Advisory Services, Inc. is an independent investment management firm specializing in portfolio management of individual and institutional investment accounts. In addition, Hebert also produces a proprietary technical stock market research publication known by the name of Institech. This publication is provided to other money managers and institutions within the financial services industry.

Hebert Advisory has been in business since 1992. The principal owner is Richard Hebert.

Educational Background and Business Experience of Investment Professionals:

Richard Hebert, MBA.

Year of birth: 1951

President and Principal, Chief Investment Officer, previous Vice President,
Hebert Advisory Services, Inc. 1999 to present

MBA, Honors, Finance emphasis, Regis University

BA, BS Finance, Cum Laude, Regis University

Business background: Investment Adviser Portfolio Manager, Technical Analyst, Operations and Finance Management professional 1999 to present. Senior Executive, Manufacturing Industry 1979 through 1998.

Kimberly (Kiki) Deane.

Year of birth: 1956

Vice President, Portfolio Manager, Hebert Advisory Services, Inc., 2008 to present.

Business Administration curriculum, Regis University

Business background: Capital Change Specialist, Trust Officer, Senior Executive Financial Operations and Portfolio Manager since 1988.

4B: Types of advisory services offered:

Hebert Advisory Services, Inc. provides two types of investment advisory services.

- 1) **Separately managed investment portfolio accounts** are offered to individual and institutional clients. Investment portfolios may be comprised of individual equity, fixed income, exchange traded funds or mutual fund securities. Depending on account style, different security asset classes may be used in various combinations within an individual account.

Portfolio Account styles Hebert offers:

- High Strength Growth account: Common stock, all equity portfolio.
- Growth and Income account: Common stock with some fixed income securities.
- Balanced account: Common stock combined with additional fixed income securities.
- ETF account: Combination of Exchange Traded Funds.

See Item 8; page 4, for details on methods of common stock analysis.

- 2) **Hebert's technical stock market research publication, Institech**, is offered to other professional money managers, financial institutions and individual investors. This research is subscription based and available at varying participation levels.

See Item 8; page 4, for details on how this research is used in Hebert's portfolio management.

4C: Ability to tailor services to client needs:

We are generally able to tailor our portfolio management efforts to clients needs. This is primarily dependent on overall asset value of account as larger account sizes lend themselves to more effective customization. Clients may impose restrictions on investing in certain types of securities.

4D: Wrap fee program participation:

We do not participate in wrap fee management programs with broker dealers.

4E: Amount of client assets managed:

As of 12/31/10: Hebert Advisory Services, Inc. total assets under management: \$ 28,413,621

Of that total: Discretionary assets under management: \$ 22,401,922

Non-discretionary assets under management: 6,011,699

Item 5: Fees and Compensation:**5A: Fee schedule and negotiability:**

Hebert Advisory's investment management fee is stated as an annual percentage rate according to the asset value of account. The following fee schedule is for clients' that elect to use Fidelity Investments for brokerage and custodian services for the account(s) Hebert will manage.

Clients desiring to use custodians or broker dealers other than Fidelity Investments will be negotiated on a case-by-case basis with Hebert. We may not be able to work with other broker dealers due to special operational conditions defined by the specific broker dealer. In addition, the client may be charged lower or higher investment management fees, commissions and other expenses by Hebert Advisory and/or the broker dealer. Please see Item 12, page 7, "Brokerage Practices" for more details.

Hebert Advisory Management Investment Fee Schedule:

Minimum annual fee:	\$ 1,750.00
Account values up to \$500,000:	1.70% per annum
Account value between \$500,000 and \$1,000,000:	1.55% per annum
Account value over \$1,000,000:	1.35% per annum
For Accounts over \$5,000,000 fees are negotiable	

5B: Client billing procedures:

Management fees are invoiced to clients quarterly in advance and fees are deducted from client accounts after invoicing.

5C: Other fees or expenses:

Clients may incur trade costs or commissions and other custodian fees or expenses. Please see Item 12, page 7, "Brokerage Practices" for more details.

5D: Advance fee payment and refunds:

Management fees are invoiced to clients quarterly in advance and fees are deducted from client accounts. The client has the right to cancel Hebert's management at any time and for any reason upon 30 days written notice to Hebert. In the event of such written cancellation notice, the client shall be entitled to a pro rata refund of prepaid management fees from the effective date of termination notice to the end of the termination quarter.

5E: Supervised Persons compensation:

Hebert Advisory Services, or any of its' supervised persons, does not accept compensation for the purchase or sale of securities or other investment products of portfolio management clients.

Item 6: Performance Based Fees and Side by Side Management:

Hebert Advisory Services, or any of its' supervised persons, does not accept performance based fees.

Item 7: Types of clients provided investment advice by Hebert Advisory.

We offer separately managed investment portfolio accounts to individuals, institutions and businesses. Hebert managed accounts are suitable for individual taxable, retirement and trust accounts as well as for Foundation, Endowment and other business or non-proto type accounts.

Recommended initial investment is \$200,000 per account.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss:**8A: Methods of analysis and investment strategies:**

Our overall investment strategy and method of equity analysis relies primarily on our proprietary technical research, Institech. This specialized research has two main features we employ:

- 1) Institech provides an overall current market description of bullish or bearish conditions and to what degree.
- 2) Each security covered within the Institech universe, approximately 4000 securities, is ranked on a percentile price performance basis compared to the universe of covered stocks. This ranking indicates comparative relative strength, aiding in buy and sell decisions.

We overlay our Institech technical research with independent, quality fundamental research providing a comprehensive security analysis from both the technical and fundamental perspective.

Our equity investment strategy is generally to be fully invested during bullish periods and to be less invested during bearish periods, as determined by our Institech research. During bearish periods weaker issues are generally sold with proceeds going into cash until more favorable market conditions return.

Our fixed income investment strategy is generally to pursue a buy and hold approach using investment grade fixed income type securities.

Investing in securities involves risk of loss, regardless of analysis methods and asset classes involved. Clients should be prepared to bear this risk of loss.

8B: Material risks involved:

Material risks from our equity investing strategy involve typical stock market risk. There is the risk that our Institech market condition description is inaccurate (ahead of or behind actual market action) resulting in missed investing opportunities and/or unanticipated losses.

Material risks from our fixed income strategy may involve interest rate fluctuations, inflation expectations or realizations, bankruptcy or default of issuer. There is the risk that debt securities rating firms have incorrectly rated a security up or down from where it actually resides resulting in capital loss.

8C: Particular securities and material risks involved:

We do not primarily recommend any particular type of security that would require comments on material or significant risks.

Item 9: Disciplinary Information:**9A: Criminal or Civil action:**

Hebert Advisory Services and/or any management person of the firm regarding civil or criminal action:

- 1) Has not been charged with, convicted of, or involved with any felony or misdemeanor that involves investments or an investment related business.
- 2) Is not the named subject of a pending criminal proceeding that involves an investment related business.
- 3) Has not been found to have been involved in a violation of an investment related statute or regulation.
- 4) Has not been the subject of any order, judgment or decree enjoining or limiting the firm or management person from engaging in any investment related activity.

9B: SEC Administrative Proceeding:

Hebert Advisory Services and/or any management person of the firm regarding SEC, any other federal regulatory agency, any state regulatory agency or any foreign regulatory agency administrative proceeding:

- 1) Has not been found to have caused an investment related business to lose its authorization to do business.
- 2) Has not been found to have been involved in a violation of an investment related statute or regulation.

9C: Self Regulatory Proceeding:

Hebert Advisory Services and/or any management person of the firm regarding a self regulatory organization (SRO) proceeding:

- 1) Has not been found to have caused an investment related business to lose its authorization to do business.
- 2) Has not been found to be involved in a violation of an SRO's rules.

Item 10: Other Financial Industry Activities and Affiliations:**10A: Management Persons and broker dealer registrations:**

Hebert Advisory Services and/or any management person of the firm is not registered and does not have an application pending to register as a broker-dealer or registered representative of a broker-dealer.

10B: Management Persons commodities or futures registrations:

Hebert Advisory Services and/or any management person of the firm is not registered and does not have an application pending to register as a futures commission merchant, commodity pool operator, or commodity trading advisor.

10C: Management Persons conflict of interest information:

Hebert Advisory Services does not have a relationship or arrangement that is material to our advisory business with related persons or firms outside of Hebert Advisory such as, but not limited to:

- 1) Broker-dealers or security dealers
- 2) Investment companies or pooled investment vehicles.
- 3) Other investment advisor or financial planner.
- 4) Future commission merchant, commodity pool operator.
- 5) Banking or thrift institution.
- 6) Accountant or accounting firm.
- 7) Lawyer or law firm.
- 8) Insurance company or agency.
- 9) Pension consultant.
- 10) Real estate broker or dealer.
- 11) Sponsor or syndicator of limited partnerships.

10D: Other investment advisors and conflicts of interest:

We do not select or recommend other investment advisors for clients.

Item 11: Code of Ethics, Interest in Client Transactions and Personal Trading.**11A: Code of Ethics pursuant to SEC rule 204A-1:**

We have adopted the Code of Ethics and Standards of Professional Conduct as developed by the Chartered Financial Analyst (CFA) Institute. Copies of this Code will be provide to any client or prospective client upon request.

11B: Interests in securities for clients and conflicts of interest:

Hebert Advisory and/or related persons do not recommend, buy or sell securities to or from clients in which we have a material interest.

11C: Personal trading and conflicts of interest:

Hebert Advisory personnel may engage in personal trading on occasion and may invest in similar securities as clients. Client trading executions take precedent. Personal trading in similar securities is not permitted prior to client executions, either buys or sells. All personal trading must not conflict with client trading activities.

11D: Conflicts of interest with buying and selling of same securities:

Hebert Advisory the firm, its personnel, including principals, directors and management, may enter into the same investment agreements as its clients. These accounts will be treated no differently than existing client accounts and be included in all typical portfolio management activities.

Item 12: Brokerage Practices:**12A: Selecting or recommending Broker Dealers for client transactions:**

We do not recommend or select broker dealers other than Fidelity Investments. See “Directed Brokerage” comments below.

12A1: Soft dollar practices:

We do not receive research or other products or services from a broker dealer or a third party In connection with client securities transactions (“soft dollar benefits”).

12A2: Brokerage for Client referrals:

We do not recommend or select broker dealers other than Fidelity Investments for client referrals. See “Directed Brokerage” comments below.

12A3: Directed Brokerage:

a) We request that clients set up brokerage accounts at Fidelity Investments under Hebert’s investment advisory platform and portfolio management. Fidelity client accounts are individual brokerage accounts and the sole property of the client. The client engages Fidelity as the broker dealer and third party custodian of their respective account(s). Not all advisers request that clients work with specific broker dealers.

Hebert does not take possession of client accounts or funds at any time. We do not receive commissions, rebates, discounts or any other monetary or in-kind compensation from Fidelity Investments for directing clients to use Fidelity’s brokerage and custodian services.

We believe this arrangement at Fidelity Investments is in the best interest of clients as we are able to efficiently bunch and trade orders, manage accounts and gain operational efficiencies by using the electronic advisory platform that Fidelity offers.

We are also required to mention that by using a directed brokerage approach such as this, that we may be unable to achieve most favorable execution of client transactions and that this practice may cost clients more money.

Trading costs at Fidelity Investments:

Clients will be charged trade commissions for each trade performed through Fidelity Investments as trades occur. Trade commissions will be reflected on each trade confirmation. Trade commissions are strictly for trading activity and attributable only to Fidelity. We do not receive any compensation or participate in any revenue sharing arrangements with Fidelity for trade activity.

Fidelity trade commission fee schedule:

Clients may elect to receive statements, trade confirmations and other financial reports and information either electronically or via paper reports through the US mail from Fidelity Investments.

For clients choosing electronic delivery, Fidelity will charge client accounts \$7.95 per equity trade for individual trades up to 10,000 shares of the same security per day.

For clients choosing paper delivery, Fidelity will charge client accounts \$14.00 per equity trade for individual trades up to 10,000 shares of the same security per day.

Trades over 10,000 shares per day of the same security will be charged an additional \$0.01 per share traded for either electronic or paper receipt of documents. Fidelity may charge additional higher rates for special situation trades such as, but not limited to: Trade away, step outs, RVP/DVP, certain unit investment trusts, foreign securities ADR/ADS and other unique trade situations.

All costs are direct from Fidelity Investments and passed through to the client accounts as charged by Fidelity Investments. Non-prototype or certain corporate accounts may not be eligible for electronic delivery of statements and trade confirmations due to Fidelity Investments fiduciary regulations.

b) Clients may direct brokerage to custodians other than Fidelity Investments on a case-by-case basis pending detailed discussions and negotiations with Hebert management prior to establishing a formal agreement with Hebert.

We may not be able to work with other broker dealers or custodians due to constraints or conditions imposed by the brokerage house on the client or us. The client may be charged lower or higher, investment management fees, commissions and other expenses by Hebert Advisory and/or the broker dealer or custodian with this brokerage arrangement.

In addition, we may not be able to aggregate orders, trade certain securities or achieve favorable transaction executions at broker dealers other than Fidelity Investments.

12B: Aggregation of security purchases and sales:

We aggregate purchases and sales of securities for clients during normal trade activities where two or more clients from the same broker dealer have the same securities designated for trading. Trade orders can only be aggregated at each broker dealer and not combined between broker dealers. Individual trades or rebalancing trades of single accounts will not be aggregated.

Item 13: Review of Accounts:**13A: Periodic review of Client accounts.**

We review client accounts on a regular basis. Our Institech technical research is published weekly and we base our routine portfolio reviews on that output. Reviews focus on individual securities held in accounts based on relative fundamental and technical values. Portfolio accounts are evaluated based on quantitative analysis, diversification, risk and performance. The Chief Investment Officer and Portfolio Manager conduct the reviews.

13B: Other than periodic review of Client accounts.

We review accounts outside of our typical weekly review under certain conditions, such as but not limited to: new accounts coming in, substantial client additions to, or withdrawals from accounts, liquidations or rebalancing and client account update requests.

13C: Reports provided to Clients.

We provide specialized reports to clients on request. Reports such as: Unrealized Gains and Losses, Realized Gains and Losses and periodic Portfolio Performance reports are available to clients as requested.

The custodian supplies regular monthly and yearly brokerage reports to clients as well as year-end tax reports if required.

Item 14: Client referrals and Other Compensation:**14A: Non-client investment advice provided to clients.**

We do not engage non-client parties or receive any compensation from others to provide investment advice to Hebert clients.

14B: Compensation for Client solicitation or referral.

We engage third party marketing firms and individuals as Solicitors of client referrals for Hebert Advisory investment management services. Solicitors enter into individual negotiated arrangements with Hebert and are compensated with a percentage of the investment management fee Hebert charges. Clients do not pay any additional amounts or fees as a result of a Solicitor referral for their account.

Item 15: Custody of Client Accounts, Funds or Securities.

We do not have or take custody of client funds at any time. Client accounts are held in custody at broker dealers, trust companies or other federal or state recognized and regulated institutions. Clients will receive periodic reports and statements from the custodian and are urged to carefully review the information received for accuracy.

Item 16: Investment Discretion.

Hebert Advisory provides discretionary portfolio investment management generally without limitations imposed by clients. Limitations are accepted in certain instances based on individual client situations. Situations such as, but not limited to, the following may be considered: securities or industries that clients have objections or philosophical differences with, securities of companies that employ clients or relatives or special individual client circumstances.

Item 17: Voting Client Securities.**17AB: Authority to vote client securities.**

We do not accept authority to vote client securities. Clients will receive proxy materials directly from their custodian or transfer agent and may elect to vote proxies on their own. Clients may contact us for advice or questions regarding specific proxy voting issues.

Class action participation:

We do not file or respond to class action issues on behalf of client owned securities. Clients inclined to participate in class actions may do so on their own behalf.

Item 18: Financial Information.**18AB: Requirements of reporting financial information.**

We do not require prepayment of investment management fees six months or more in advance therefore no financial information reporting is required.

18C: Hebert Advisory or its principals have not been the subject of a bankruptcy petition at any time during the past ten years.