



ADV PART II SUMMARY

Advisory Services and Fees

100% of investment supervisory and investment services are fee-only including, but not limited to, a percentage of the market value of the assets under management, an hourly rate or a pre-determined minimum fee. Fees are determined based on the anticipated amount of work needed and are determined on a case by cases basis. The complicated nature of the engagement, the amount of work involved, the value of the current portfolio and/or the projected future value of the portfolio determines the fee schedule. Investment fees are determined and set at the onset of the engagement and are part of the Investment Advisory Agreement.

Compensation for assets under management is payable quarterly as a percentage of the average balance of the beginning day and ending day in the quarter. Fees are pro-rated on a daily basis at initiation and termination of the agreement. There are no refunds of any fees. All clients may terminate their investment advisory contracts at will with written notice. There are no contract dates.

We do not accept any sales commissions, referral fees or other forms of compensation from any third parties. We utilize mutual funds as an excellent investment to diversify portfolios. While we do not use commission-based or “load” funds, all mutual funds have an internal charge. This internal fee is charged by the mutual fund and is built in to cover the cost of managing the fund but is not to be confused with a commission or any fees we receive.

Types of Clients

Investment advice is provided for individuals, profit sharing plans, trusts, estates, charitable organizations, corporations, or business entities.

Types of Investments

Advice is offered on exchange-listed securities, certificates of deposits, exchange traded funds, mutual funds, variable annuities, and United States government securities.

Education and Business Background

Brett R. Smith was born in 1954. He has actively worked in the field of taxation and finance for over 20 years. He is a registered investment advisor, a member of the National Association of Personal Financial Advisors (NAPFA), a member of the Financial Planning Association (FPA), a member of the Personal Finance Division of the American Institute of Certified Public Accountants (AICPA) and a member of the National Association of Tax Professionals (NATP.) He holds the following degrees and certifications:

- Bachelor of Science in Business Administration – Public Accounting Major – Kansas State University
- Bachelor of Science – Economic Major – Colorado State University
- Master of Business Administration – Colorado University
- Master of Taxation – Denver University
- Certified Public Accountant (CPA)
- Certified Financial Planner (CFP)
- Personal Financial Specialist (PFS)

Method of Analysis, Sources of Information & Investment Strategies

Fundamental security analysis methods are used. The main sources of information are financial newspapers and magazines, research materials prepared by others, annual reports, prospectuses, filings with the Securities and Exchange Commission and company press releases. Investment strategies are long-term.

Other Business Activities

Brett R. Smith & Company, CPAs, LLC is a full service accounting and tax preparation firm that works in cooperation with Brett R. Smith CPA Wealth Management, LLC. Brett R. Smith & Company employs an experienced staff of personnel including CPAs, accountants and administrative assistants who perform accounting tasks and prepare and process tax returns for individuals and businesses. Brett Smith does tax planning and tax preparation for most of the investment clients.

BRS Farms, LLC is a crop farming business located in Kansas. Brett Smith does not personally perform any of the physical farming duties associated with planting or harvesting. All farming operations are performed by hired individuals. In an average year, Brett Smith spends five days on site which is predominantly on the weekends.

Participation or Interest in Client Transactions

Brett makes recommendations of security transactions to clients and personally buys or sells the securities. He receives no sales commissions for the securities he recommends and is a fee-only investment planner. A copy of his code of ethics is available to all clients and prospective clients upon request.

Review of Accounts

Portfolios and accounts of assets under management clients are reviewed on an ongoing basis. Quarterly portfolio statements are generated and provided to assets under management clients. Work performed for hourly rate clients are done at the request and direction of the client.

Investment or Brokerage Discretion

Brett has full authority over the specific securities to be bought or sold as well as the amount to be bought or sold. Brett does not utilize broker/dealers. Brett will suggest TD Ameritrade, Inc. as the account custodian, but the client has the authority to accept or decline his suggestion.

Trade Error Correction

It is Brett's policy to ensure clients are made whole following a trade error caused by employees of Brett R. Smith CPA Wealth Management, LLC. If said trade error occurs in a client's account that results in a loss, Brett R. Smith CPA Wealth Management, LLC will reimburse the client.

Additional Compensation

There are no direct or indirect arrangements created for compensation or economic benefit for client referrals. All compensation comes directly from the client.

Confidentiality & Privacy

The CPA and CFP certification does not allow disclosure of client information to any third parties without client approval. The firm prides itself with the highest integrity in all facets of business including confidentiality. At no time will names, addresses or other information be sold or given to third parties. A copy of the firm's privacy policy is available and provided to all clients and prospective clients upon request.