



SMS FINANCIAL & INVESTMENT MANAGEMENT

AN SEC REGISTERED INVESTMENT ADVISOR

Streeter, Moore & Stipe LLC
dba: SMS Financial & Investment Management
4111 S. Darlington Avenue, Suite 120
Tulsa, OK 74135
www.SMSAdvisor.com

January 1, 2011

This brochure has not been approved by the Securities and Exchange Commission or any state securities authority. Registration doesn't imply a certain level of skill or training.

2) Material Changes

Since this is our first brochure we do not have any material changes to disclose.

3) Table of Contents

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4) Advisory Business

Streeter, Moore & Stipe L.L.C.(SMS), is a full service financial and investment management firm. Approximately 75% of the Advisory Services provided by the our firm is devoted to investment related matters and approximately 25% is devoted towards non-securities related matters such as insurance advice, tax advice, financial advice, etc.

We provide investment supervisory services, defined as giving continuous advice to a client or making investments on a clients behalf based on their individual needs. Through personal discussion goals and objectives are established and based on the client's particular circumstances. With this information we develop a client's personal investment policy and create and manage a portfolio based on

that policy. Services are provided to individuals, bank or thrift institutions, pension and profit sharing plans, trusts, estates, charitable organizations and corporations. Streeter Moore & Stipe L.L.C. will manage advisory accounts on a non-discretionary basis and a discretionary basis depending on the needs and desires of the client. Account supervision is guided by the stated objectives of the client (i.e. Maximum capital appreciation, growth, income, or growth and income). Streeter Moore & Stipe L.L.C. manages approximately \$108,298,500.

We manage investment advisory accounts not involving investment supervisory services to individuals, bank or thrift institutions, pension and profit sharing plans, trusts, estates, charitable organizations and corporations. We will manage advisory accounts on discretionary and a non discretionary basis. Account supervision is guided by the stated objectives of the client (i.e. maximum capital appreciation, growth, income or growth and income). Each portfolio is designed to meet a particular investment goal the client and advisor have determined is suitable for the client's circumstances.

Once the appropriate portfolio has been determined, the portfolio will be reviewed periodically and if necessary rebalance the portfolio based on the portfolio goal and each client's individual needs. However, each client will have the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

SMS also provides advice in the form of a Financial Plan, Clients purchasing this service will receive a written financial plan, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives. In general, the financial plan will address the following areas of concern:

Personal: Family records, budgeting, personal liability, estate information and financial goals.

Tax and Cash Flow: Income tax and spending analysis and planning for past, current and future years. Applicant will illustrate the impact of various investments on a client's current income tax and future tax liability.

Death and Disability: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.

Retirement: Analysis of current strategies and investment plans to help the client achieve their retirement goals.

Investments: Analysis of investment alternatives, risk tolerance, time frame and their effect on a client's portfolio.

We gather information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals, and attitudes

towards risk. Documents are supplied by the client and a written report is prepared for them. We suggest that the client work closely with their attorney, accountant, insurance agent or stockbroker. Implementation of the financial plan recommendation is entirely at the client's discretion.

5) *Fees and Compensation*

Our clients will pay Streeter Moore & Stipe L.L.C. a fee for its investment supervisory and/or advisory services. The fee will be a percentage (not to exceed 2% annually) of the market value of all assets in the account on the last trading day of each calendar quarter.

The Advisor Fee is generally payable quarterly in arrears, although Advisory Fee's can be paid in advance if specified in the Client Agreement. Clients may terminate advisory agreement by written notice to the Advisor. Clients are obligated to pay the Advisory Fee to us pro rated through the date of termination. All fees paid to the applicant for investment advisory services are separate and distinct from the fees and expenses charged by the mutual funds to their shareholders. These fees and expenses are described in each prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge, but this is not normal. A client could invest in a mutual fund directly, without the services of applicant. In that case, the client would not receive the services provided by us which are designed, among other things to assist the client in determining which mutual fund or funds are most appropriate to each client.

Streeter Moore & Stipe L.L.C.'s fee schedule is as follows:

\$ 20,000 to \$500,000	1.5%
\$500,001 to \$1,000,000	1.25%
\$1,000,001 or higher	1%

We reserve the right to negotiate Advisory Fees.

SMS generally places client assets in noncommissioned products, except in instances in which a certain product meets a certain need although it bears a commission.

Some associated persons of SMS are securities licensed through Financial Services International Corporation (fsic) a registered broker/dealer, member FINRA, SIPC. Clients are not obligated to execute securities transaction through associated advisors of applicant.

However, if a client chooses to execute securities transactions through these individuals, the clients are advised that they may or may not pay a commission to them and as such there exist a conflict of interest.

The Advisors of SMS may charge hourly fees of \$100 per hour for preparation of a financial plan and for review services. The number of hours required to complete a financial plan and to provide review services will depend on the complexity of the case and will be negotiated with the client prior to engagement. When calculating the fees to complete a written financial plan, half of the estimated fee is due up-front, and the balance is due upon presentation of plan.

Clients expressly understand that financial planning advice is not contingent upon product sales of any kind. Clients are free to select any licensed broker for securities and any licensed insurance agent for fixed products. However, the client may choose to execute the corresponding transactions through associates of SMS as long as the advisor representatives are properly licensed. Clients are not obligated to purchase insurance products from associated advisors of applicant. However, if clients do choose to purchase insurance products it may or may not pay a commission to them and as such there exist a conflict of interest.

6) *Performance Based Fees & Side by Side Management*

Streeter Moore & Stipe LLC does not provide performance based investment advisory services.

7) *Types of Clients*

Streeter Moore & Stipe LLC generally provides investment advice to individuals, banks or thrift institutions, pension and profit sharing plans, Trusts, Estates, charitable organizations, corporations or other business entities. Investment Advisor Representatives can provide and manage investment advisory accounts exceeding \$20,000. There is no minimum dollar value of assets as a condition in order to provide financial planning services.

8) *Methods of Analysis, Investment Strategies, and Risk of Loss*

Streeter Moore & Stipe LLC and its Advisor Representatives use several different methods of security analysis. They include Cyclical Analysis, Fundamental Analysis, which analyzes company or economic fundamentals, Technical Analysis which analyzes a investments past performance and uses the charts to find patterns to use as a indicator of a investments future performance. Most investments will fluctuate with changes in market conditions and when sold the investor may receive back more or less than their original investment amount.

The investment strategies that SMS primarily uses to implement any investment advice given to clients include Long Term purchases, which are securities held at least a year and Short Term purchases which are securities sold within a year. Other investment strategies that we use can include Trading, securities sold within 30 days, margin transactions and option writing, including covered options, uncovered options or spreading strategies. Strategies involving frequent trading can negatively affect an individual's investment performance.

9) Disciplinary Information

Streeter Moore & Stipe LLC does not have any material legal or disciplinary events to disclose.

10) Other Financial Industry Activities and Affiliations

Streeter, Moore & Stipe LLC generally places client assets in noncommissioned products, except in instances in which a certain product meets a certain need although it bears a commission.

Some associated persons of SMS are securities licensed through Financial Services International Corporation (fsic) a registered broker/dealer, member FINRA, SIPC. Clients are not obligated to execute securities transaction through associated advisors of applicant.

However, if clients choose to execute securities transactions through these individuals, the clients are advised that they may or may not pay a commission to them and as such there exist a conflict of interest.

Some associated persons of SMS are licensed to offer fixed and variable insurance products through various insurance companies. Clients are not obligated to purchase insurance products from associated advisors of SMS. However, if clients do choose to purchase insurance products they may or may not pay a commission to them and as such there exist a conflict of interest.

11) Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

a. Code of Ethics

Code of Ethics for Advisor Representatives:

I will not engage in any conduct involving dishonesty, fraud, deceit, or commit any act that reflects adversely on my integrity, trustworthiness, or professional competence.

If I provide investment advice to clients or prospective clients, I will make a reasonable inquiry into the investment experience, risk and return objectives, and financial constraints of the client or prospective client before making any investment recommendation or taking investment action and will reassess and update this information as needed. If I am responsible for managing a portfolio to a specific mandate, strategy, or style, I will only make investment recommendations or take investment actions that are consistent with the stated objectives, and constraints of the portfolio.

I will exercise diligence, independence and thoroughness in conducting investment analysis, making investment recommendations, and taking investment actions; and I will have a reasonable and adequate basis, supported by appropriate research and investigation, for making any investment analysis, recommendation, and taking any action.

I will create and maintain appropriate records to support my investment analyses, recommendations, actions, performance, and other investment-related communications with clients and prospective clients.

Upon request I will disclose to clients and prospective clients the basic format and general principles of the investment processes by which investments are analyzed, securities are selected, and portfolios are constructed and will promptly disclose any changes that might materially affect those processes. I will use reasonable judgment in identifying which factors are important to client investment analyses, recommendations, or actions and include those factors in communications with clients and prospective clients.

I will make full and fair disclosure of all matters that could reasonably be expected to impair my independence and objectivity or interfere with my respective duties to Streeter Moore & Stipe LLC, clients, or prospective clients. I will ensure that disclosures are prominent, are delivered in plain language, and communicate the relevant information effectively.

I will not knowingly make any statement that misrepresents facts relating to investment analysis, recommendations, actions, or other professional activities.

I will not make or imply any assurances or guarantees regarding any investment except to communicate accurate information regarding the

characteristics and terms of the investment instrument and the issuer's obligations under the instrument

When I communicate investment performance information, I will make reasonable efforts to ensure that it is fair, accurate, and complete.

I will keep information about current, former, and prospective clients confidential unless: 1) the information concerns illegal activities on the part of the client or prospective client, 2) disclosure is required by law, or 3) the client or prospective client provides written permission allowing disclosure of the information.

I will place the interests of Streeter Moore & Stipe LLC before my own and will not deprive the firm of the advantage of my skills and abilities, divulge confidential information, or otherwise cause harm to the firm.

I will comply with the policies and procedures established by the firm to the extent that there is no conflict with applicable laws, rules, and regulations.

I will endeavor to understand and comply with all applicable laws, rules, and regulations of any government, governmental agency, regulatory organization, licensing agency, or professional association governing professional activities. I will not knowingly participate

I will comply with the policies and procedures established by the firm to the extent that there is no conflict with applicable laws, rules, and regulations.

I will endeavor to understand and comply with all applicable laws, rules, and regulations of any government, governmental agency, regulatory organization, licensing agency, or professional association governing professional activities. I will not knowingly participate or assist in, and will dissociate myself from, any violation of such laws, rules, or regulations.

I will make reasonable efforts to detect and prevent violations of applicable laws, rules, and regulations by anyone subject to my supervision or authority.

If I possess material nonpublic information related to the value of an investment I will not act, or cause others to act, on the information, until that information is made public.

I will not offer, solicit, or accept any gift, benefit, compensation or consideration that could be reasonably expected to compromise my own or another's independence and objectivity. I will not accept gifts, benefits, compensation, or consideration that competes with, or might reasonably be expected to create a conflict of interest with the firm unless I obtain written consent.

I will not purchase or sell any security prior to a block transaction(s) being implemented for an advisory account, and therefore, preventing me from benefiting from transactions placed on behalf of advisory accounts.

I will not invest in IPO's prior to secondary trading, and must receive pre-clearance to invest in private placements by the firm's compliance officer.

I will promptly report any observed violations of this Code of Ethics to the firm's compliance officer.

I have been provided with a copy of the code of ethics and any amendments and I will promptly return a signed and dated acknowledgment of this Code of Ethics to the firm's compliance officer.

b. Participation or Interest in Client Transactions & Personal Trading

It is expressed policy of Streeter, Moore & Stipe LLC that no person employed by applicant may purchase or sell any security prior to a block transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

SMS or individuals associated with SMS may buy, or sell securities identical to those recommended to customers for their personal accounts. Additionally, any associated advisor may have an interest or position in a certain securities which may also be recommended to client. As these situations represent a conflict of interest, applicant has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1) A director, officer or employee of applicant shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived in whole or part by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of applicant shall prefer his or her own interest to that of the advisory clients.
- 2) All clients are fully informed that certain individuals may receive separate compensation when effecting transactions during the implementation process.
- 3) SMS emphasizes the unrestricted right of the client to decline to implement any advice rendered.
- 4) SMS requires that all individuals must act in accordance with all Federal and State regulations governing registered investment advisory practices.

5) Any individuals not in observance of the above may be subject to termination.

12) Brokerage Practices

Clients in need of brokerage and/or custodial services will have a broker or custodian recommended to them. The principal officers and other associated persons of SMS are securities licensed through either Financial Services International Corporation (fsic) or Silver Oak Securities Inc., broker/dealers and FINRA members firms. Both broker/dealers are required to supervise securities trading activities of its representatives. The following advisors are associated with Financial Services International Corporation (fsic): Stephen Streeter & Robert Bandy. Clearing firms available and approved through Financial Services International Corporation (fsic) are Raymond James & Associates, Charles Schwab, Russell Investment Group, Fidelity Institutional, and SEI Investments.

Clients may request the brokerage transactions be directed to a particular broker or dealer. However, if a broker/dealer believes that the use of that broker dealer would hinder their meeting it's supervisory obligations, Applicant will not be able to accept the account.

a. Soft Dollar Practices

Services provided by Raymond James Financial Services (RJFS) or Raymond James & Associates (RJA) to financial advisory firms include research (including mutual fund research, third-party research, and Raymond James & Associates, Inc's (RJA) proprietary research), brokerage, custody, access to mutual funds and other investments that are available only to institutional investors or would require a significantly higher minimum initial investment. In addition, RJFS and RJA makes available software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution, provide research, pricing information, quotation services, including market data services, and other market data, assist with contact management, facilitate payment of fees to the firm from client accounts, assist with performance reporting, facilitate trade allocation, and assist with back-office support, record-keeping, and client reporting. RJFS and RJA also provides access to financial planning software, practice management consulting support, best execution assistance, consolidated statements assistance, educational and industry conferences, marketing and educational materials, technological and information technology support, and RJFS corporate discounts. Many of these services may be used to service all or a substantial number of the firms' accounts, including accounts not maintained at RJFS or RJA.

b. Client Referrals

Streeter Moore & Stipe LLC does not compensate clients through client brokerage for client referrals. This would create a conflict of interest with the client.

c. Directed Brokerage

Streeter Moore & Stipe LLC does not routinely allow clients to direct brokerage practices, even though we are able to do so. If a client is directing their own brokerage we may be unable to obtain the most favorable execution of client transactions and may be more costly for clients.

d. Trade Aggregation

Streeter Moore & Stipe LLC does not routinely offer aggregate trading since our main custodian Raymond James does not offer volume discounts on trade execution costs.

13) Review of Accounts

Financial Planning: A Financial Planning client's entire plan is reviewed periodically, The frequency depends on the clients income, assets and objectives. Annual reviews are normal, but reviews may be less frequent. Special client situations or changes in market conditions could also trigger additional reviews. Reviews are conducted by associated advisors.

Financial Planning: Clients are furnished with updated net worth statements as often as desired. Other reports covering specific portions of their plan such as tax projections, estate planning, budgeting and cash flow may be provided periodically during the year. Clients may receive an updated financial plan upon request; otherwise, plans will be provided no more than annually.

Investment Management: Reviews are provided as often as quarterly to most clients on either a discretionary or a non-discretionary basis. The reports will be reviewed by associated advisors. Each reviewer handles less than 150 clients.

Investment Management: Account custodians will provide reports as often as monthly to most clients which show all account activity since the prior report and show current market values, estimated income, internal rates of return, and portfolio diversification. Clients are encouraged to participate in meetings with advisor to discuss and review the account. Additional reports may also be provided by the advisor as often as quarterly.

14) Client Referrals and other Compensation

The Advisers Act establishes requirements that must be met if an investment adviser pays a cash fee for referrals or solicitations. If the firm pays cash solicitation fees it must disclose its referral arrangements to clients and maintain certain related records, to include copies of: the written agreements between the adviser and the referring party; the referring party's written disclosure documents; and, from each client, acknowledgments of receipt of written disclosure documents from the adviser and the referring party (which must be signed and dated).

In order for the firm to pay a cash fee, directly or indirectly, to a solicitor with respect to solicitation activities, the solicitor may not be barred from the industry or have an investment related conviction in the last ten years and the cash fee must be paid pursuant to a written agreement to which the firm is a party.

The firm may engage solicitors to whom it pays cash or a portion of the advisory fees paid by clients referred to it by those solicitors. In such cases, this practice is disclosed in writing to the client, and complies with the other requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940. If the solicitor is an associated person of the firm, this status must be disclosed to the client at the time of referral. If the solicitor is not an associated person of the firm, they must hand out a written disclosure document to the client describing their compensation arrangement with the firm.

Solicitors in no way will advise or make recommendations for client's accounts. Solicitors will be paid either a fee or a percent of the client's asset management fees.

15) Custody

In general, client funds and securities may be kept in multiple locations. Streeter Moore & Stipe LLC does not directly hold client funds or securities. Some client accounts may be debited for their quarterly fees and some other accounts may receive a bill for the quarterly fees. Clients should review their client statements from Raymond James or another qualified custodian for accuracy.

16) Investment Discretion

Streeter Moore & Stipe LLC or any related person may have the authority to determine, without obtaining specific clients consent either: the securities to be bought or sold, amount of the securities to be bought or sold, broker or dealer to be used or commission rates paid.

17) Voting Client Securities

Streeter Moore & Stipe LLC's Investment Management Agreement specifically states that the firm does not have the authority to exercise the power to vote any securities or retain any proxy authority.

18) Financial Information

The Securities and Exchange Commission requires that a advisor must provide a balance sheet for the most recent year if they have custody of client securities or if clients pay in advance more than \$500 or if client is billed more than 6 months in advance. Streeter Moore & Stipe LLC does not meet the conditions that are required to provide a financial statement.



Brochure Supplement

For

Stephen Streeter

Streeter, Moore & Stipe LLC
Dbas: SMS Financial & Investment Management
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Brochure Supplement for Stephen Streeter

1. Educational Background and Business Experience

Originally from Claremore, Oklahoma, Stephen graduated from Oklahoma State University with a degree in Finance minoring in both Accounting and Economics.

Upon graduation Stephen began his financial services career in 1990 at Liberty Bank of Tulsa. In 1995 Stephen set up Financial Planning Concepts as a Registered Investment Advisor which is currently operating as Streeter Moore & Stipe LLC also known as SMS Financial & Investment Management.

2. Disciplinary Information

Stephen does not have any disciplinary information to disclose.

3. Other Business Activities

As founder of Streeter Moore & Stipe LLC, Stephen has responsibilities that include the day to day management of the firm.

Stephen is co-owner of BTO Properties LLC, that buys, sells and leases real estate.

Stephen is licensed through the State of Oklahoma to sell Health, Life, Annuity and Long Term Care Insurance. Clients are not obligated to purchase insurance through Stephen; however, if clients decide to purchase products they may or may not pay a commission to him and as such there may exist a conflict of interest.

Stephen is securities licensed through Financial Services International Corporation (fsic) a registered broker/dealer, member FINRA, SIPC. Clients are not obligated to execute securities transaction through them. However, if a client chooses to execute securities transactions, the client is advised that they may or may not pay a commission to them and as such there may exist a conflict of interest.

4. Additional Compensation

Stephen Streeter does not have any arrangements in which someone other than a client gives him economic benefit for providing advisory services.

5. Supervision

Streeter Moore & Stipe LLC monitors the advice of its representatives in several different ways including email search and review, monitoring client paperwork and client agreements and random annual audits of client accounts. For questions or concerns, clients will need to contact Stephen Stipe the Chief Compliance Officer at Streeter, Moore & Stipe LLC. He can be reached at our Tulsa office at (918) 499-1700.



Brochure Supplement

For

Stephen Stipe

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Brochure Supplement for Stephen Stipe

1. *Educational Background and Business Experience*

After graduating high school in Leander Texas, Stephen attended Austin Community College in Austin Texas. In 1990 he transferred to the University of Mary-Hardin Baylor (UMHB) in Belton Texas. He graduated in 1994 with a Bachelor's degree in Business Administration. He majored in Finance and Economics.

Stephen began his career in 1992 as registered representative with PFS Investments. After graduation from college he began his career with Edward Jones in Dallas Texas. In 1995 he moved to Tulsa and in 1998 he helped to build a new company called Streeter Moore & Stipe LLC. A few years later the name was changed to SMS Financial & Investment Management.

2. *Disciplinary Information*

Stephen does not have any disciplinary information to disclose.

3. *Other Business Activities*

Stephen has additional responsibilities at Streeter Moore & Stipe other than a financial advisor. He is also the Chief Compliance officer for the firm. Stephen is also licensed through the State of Oklahoma to sell Accident & Health, Life, Annuity and Long Term Care insurance. Clients are not obligated to purchase insurance products from Stephen. However, if clients do choose to purchase insurance products it may or may not pay a commission to them and as such there exist a conflict of interest.

4. *Additional Compensation*

Stephen Stipe does not have any arrangements in which someone other than a client gives him an economic benefit for providing advisory services.

5. *Supervision*

Streeter Moore & Stipe LLC monitors the advice of its representatives in several different ways including email search and review, monitoring client paperwork and client agreements and random annual audits of client accounts. Since Stephen Stipe is the Chief Compliance Officer at Streeter Moore & Stipe LLC, clients will need to contact Stephen Streeter with questions or concerns. He can be reached at our Tulsa office at (918) 481-6262.



Brochure Supplement

For

Rob Bandy

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Brochure Supplement for Rob Bandy

1. Educational Background and Business Experience

After graduating high school in Eureka Springs, Arkansas, Robert attended the University of Arkansas in Fayetteville Arkansas. In 1991 he graduated with honors from the University of Arkansas with a Bachelor's degree in Business Administration.

2. Disciplinary Information

Robert Bandy does not have any disciplinary action to disclose

3. Other Business Activities

Robert has past experience in additional business activities. After graduating from college at the University of Arkansas, Robert was an owner in a successful condominium development as well as two successful equipment leasing companies. He was also part of a restaurant development venture that was unsuccessful and filed bankruptcy. In addition Robert has a business interest in an online advertising and marketing company.

Robert is also licensed through the State of Oklahoma to sell Health, Life, Annuity and Long Term Care Insurance. Clients are not obligated to purchase insurance through Robert. However, if clients do decide to purchase products they may or may not pay a commission to them and as such there may exist a conflict of interest.

Robert is securities licensed through Financial Services International Corporation (fsic) a registered broker/dealer, member FINRA, SIPC. Clients are not obligated to execute securities transactions through them; however, if a client chooses to execute securities transactions through them, the client is advised that they may or may not pay a commission to them and as such there may exist a conflict of interest.

4. Additional Compensation

Robert Bandy does not have any arrangements in which someone other than a client gives him economic benefit for providing advisory services.

5. *Supervision*

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Brochure Supplement

For

David Shoesmith

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Brochure Supplement for David Shoesmith

1. Educational Background and Business Experience

David received his bachelor's degree in Finance with Insurance and Risk Management from Southwest Missouri State University (currently Missouri State University) in 1995. David earned his Chartered Financial Consultant (ChFC) designation in 2001 from the American College. The program consists of an eight course program and 16 hours of examination. The ChFC program focuses on the complete financial planning process as an organized way to collect and analyze information on a client's total financial situation; identify and establish specific goals; and formulate, implement and monitor a comprehensive plan to achieve those goals. The subject matter covered by the program includes financial planning, wealth accumulation and estate planning, income taxation, investment and retirement planning using stocks, bonds, and mutual funds.

David started his career as a Registered Representative in 1997, and has been specializing in fee-based asset management as a Registered Investment Advisor Representative since 2000.

2. Disciplinary Information

David does not have any disciplinary information to disclose.

3. Other Business Activities

David is president of Shoesmith Financial Services Inc; in which he spends approximately 5 hours a week. Duties are to recommend and review insurance products as needed.

David is also licensed through the State of Oklahoma to sell Accident & Health, Life, Annuity and Long Term Care insurance. Clients are not obligated to purchase insurance products from David. However, if clients do choose to purchase insurance products it may or may not pay a commission to them and as such there exist a conflict of interest.

4. Additional Compensation

David does not have any arrangements in which someone other than a client gives him an economic benefit for providing advisory services.

5. *Supervision*

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Brochure Supplement

For

JoAnna McCall

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Brochure Supplement for JoAnna McCall

1. *Educational Background and Business Experience*

JoAnna became a Certified Financial Planner Practitioner in 1999. CFP® certificates must pass the comprehensive CFP® Certification Examination, pass CFP Board's *Candidate Fitness Standards*, agree to abide by CFP Board's *Code of Ethics and Professional Responsibility* which puts clients' interests first and comply with the *Financial Planning Practice Standards* which spell out what clients should be able to reasonably expect from the financial planning engagement.

JoAnna has been a Certified Public Accountant since 1982. A Certified Public Accountant must be of good moral character, must submit to a national criminal history record check, must be a resident of Oklahoma, and must have graduated from an accredited four-year college or university with a major in accounting or with a non-accounting major supplemented by what the Oklahoma Accountancy Board determines to be the equivalent of an accounting major of any four-year college or university.

JoAnna is also licensed through the State of Oklahoma to sell Accident & Health, Life, Annuity and Long Term Care insurance. Clients are not obligated to purchase insurance products from applicant. However, if clients do choose to purchase insurance products, she may be paid a commission. Due to this, there exists a conflict of interest.

2. *Disciplinary Information*

JoAnna does not have any disciplinary information to disclose.

3. *Other Business Activities*

JoAnna is president of JoAnna McCall, PC, a firm which offers tax preparation services and insurance products.

4. *Additional Compensation*

JoAnna receives compensation in the form of commissions from fixed annuities, long-term care insurance and other insurance products. She is also paid for tax return preparation. JoAnna does not have any arrangements in which someone other than a client gives her an economic benefit for providing advisory services.

5. *Supervision*

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SMS FINANCIAL & INVESTMENT MANAGEMENT

AN SEC REGISTERED INVESTMENT ADVISOR

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For

William Drumm

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Brochure Supplement for William Drumm

1. *Educational Background and Business Experience*

William received his bachelor's degree in Business Administration with a major in accounting from Oklahoma State University in 1975. William passed his CPA in July 1985.

William started his career as a Registered Representative in 2001, and has been specializing in fee-based asset management as a Registered Investment Advisor Representative since 2001.

2. *Disciplinary Information*

William does not have any disciplinary information to disclose.

3. *Other Business Activities*

William is president of Drumm & Associates PC. He spends 90% of time per week with duties are to prepare income taxes, accounting, and payroll services.

4. *Additional Compensation*

William doesn't have any additional compensation to disclose.

5. *Supervision*

Streeter Moore & Stipe LLC monitors the advice of its representatives in several different ways including email search and review, monitoring client paperwork and client agreements and random annual audits of client accounts. For questions or concerns, clients will need to contact Stephen Stipe the Chief Compliance Officer at Streeter, Moore & Stipe LLC. He can be reached at our Tulsa office at (918) 499-1700.