

## **Firm Brochure**

(Part 2A of Form ADV)



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This brochure provides information about the qualifications and business practices of highWAY Financial Networks, Inc. If you have any questions about the contents of this brochure, please contact us at: 530-223-1222, or by email at: [info@highwayfinancial.com](mailto:info@highwayfinancial.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 Highway Financial Networks, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**March 25, 2011**

Highway Financial Networks, Inc.

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

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### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 530-223-1222 or by email at: [info@highwayfinancial.com](mailto:info@highwayfinancial.com).

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## Item 4: Advisory Business

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### Firm Description

Highway Financial Networks, Inc. ("highWAY") was founded in 2001. Bryan John Erickson is the Chief Compliance Officer, President and majority owner.

highWAY provides personalized confidential financial planning and investment management to individuals, institutional clients, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

highWAY is a fee based financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products.

Investment advice is provided on both a discretionary and non-discretionary basis. When the account is being managed as non-discretionary, the client makes the final decision on investment selection. highWAY does not act as a custodian of client assets.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or risk analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

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### Types of Advisory Services

highWAY provides investment supervisory services, also known as asset management services and furnishes financial planning and investment advice through consultations.

On more than an occasional basis, highWAY furnishes advice to clients on matters not involving securities, such as taxation issues and trust services that often include estate planning.

### ASSET MANAGEMENT

highWAY offers both discretionary and non-discretionary direct asset management services to advisory clients. highWAY will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, assets allocation, portfolio monitoring and the overall investment program will be based on the above factors.

highWAY's *Prudent Investor Essentials*<sup>SM</sup> portfolios are generally comprised mutual funds and/or Exchange Traded Funds (ETF's). highWAY applies both an academic and practical analysis of the Modern Portfolio Theory to build risk-managed portfolios

that will endure throughout a client's lifetime. In addition, highWAY may employ the analysis and information provided by third-party advisers to evaluate investment products.

highWAY *Fixed Income* portfolios are comprised of fixed income investment instruments including bonds, bills, notes, certificates of deposit, commercial paper, money market funds and other obligations issued by governments, municipalities and corporations. Mutual funds and Exchange Traded Funds (ETF's) that invest in fixed income assets can be included in the fixed income portfolios

#### **FINANCIAL PLANNING AND CONSULTING**

If financial planning services are applicable, the client will compensate highWAY on an hourly fee basis described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, College Planning and Insurance. If conflict of interest exists between the interests of the investment advisor and the interests of the client, the client is under no obligation to act upon the investment advisor's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through highWAY. Financial plans will be completed and delivered inside of 6 months. Clients may terminate advisory services with 30 days written notice.

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#### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

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#### **Wrap Fee Programs**

highWAY does not participate in wrap fee programs.

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#### **Client Assets under Management**

As of December 31, 2010 highWAY has approximately \$8,000,000 of client assets under management on a discretionary basis and \$1,300,000 on a non-discretionary basis.

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### **Item 5: Fees and Compensation**

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#### **Method of Compensation and Fee Schedule**

highWAY bases its fees on a percentage of assets under management, hourly charges, fixed fees and solicitor fees from third party money managers.

#### **ASSET MANAGEMENT**

highWAY offers both discretionary and non-discretionary direct asset management services to advisory clients. highWAY will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, assets allocation, portfolio monitoring and the overall investment program will be based on the above factors.

Fees for these services will be based on a percentage of Assets Under Management as follows:

Prudent Investor Essentials			
Assets Under Management	Management Fee	Advisory Fee	Total Fee
First \$500,000	0.30%	1.30%	1.60%
\$500,000 - \$1,000,000	0.30%	1.10%	1.40%
\$1,000,001 - \$2,000,000	0.30%	0.90%	1.20%
\$2,000,001 - \$3,000,000	0.30%	0.70%	1.00%
\$3,000,001 – Over	0.30%	0.50%	0.80%

Fixed Income Portfolio			
Assets Under Management	Management Fee	Advisory Fee	Total Fee
First \$1,000,000	0.20%	0.30%	0.50%
\$1,000,001 - \$2,000,000	0.20%	0.25%	0.45%
\$2,000,001 - \$3,000,000	0.20%	0.20%	0.40%
\$3,000,001 – Over	0.20%	0.15%	0.35%

Asset based management fees will range are charged quarterly in advance based on the values of assets under management at the beginning of the calendar quarter. Investment advisory services begin with the effective date of the Agreement, which is the date the client signs the Investment Advisory Agreement. For that calendar quarter, fees will be adjusted pro rata based upon the number of calendar days remaining in the calendar quarter the Agreement was effective. Fees will generally be deducted directly from the client's brokerage account pursuant to a written agreement. highWAY reserves the right to adjust the fee schedule and a minimum account fee. In some cases, negotiation of fees may result in different fees being charged for similar services and may be less than the stated fee schedule.

Either highWAY or the client may terminate the Investment Advisory Agreement at any time upon 30 days written notice to the other party. The client is responsible to pay for any services rendered until the termination of the Agreement. Upon termination, fees charged for advisory services will be pro-rated and a refund for any unearned advisory fees will be issued. The client may cancel the Agreement without penalty within the first five days after signing the agreement.

## FINANCIAL PLANNING and CONSULTING

### FIXED FEES

Financial Planning Services are offered based on a negotiable fixed fee with a maximum fee of \$20,000 based on complexity and unique client needs. Prior to the planning process the client will be provided an estimated plan fee. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, College Planning and Insurance. The payments are received in two installments: half at the commencement of the planning process, balance of the final payment is due upon delivery of completed plan. Client may cancel within five (5) days of signing Agreement for a full refund. If the client cancels after five (5) days, any unearned fees will be refunded to the client.

### HOURLY FEES

Financial Planning Services are offered based on an hourly fee of \$250 per hour. Prior to the planning process the client will be provided an estimated plan fee. Services include but are not limited to a thorough review of all applicable topics

including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. The payments are received in two installments: half at the commencement of the planning process, balance of the final payment is due upon delivery of completed plan. Client may cancel within five (5) days of signing Agreement for a full refund. If the client cancels after five (5) days, any unearned fees will be refunded to the client.

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### **Client Payment of Fees**

Investment management fees are billed quarterly, in advance, meaning that we invoice you before the three-month billing period has started. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan.

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### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

highWAY, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

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### **Prepayment of Client Fees**

Investment management fees are billed quarterly, in advance, meaning that we invoice you before the three-month billing period has started. Payment in full is expected upon invoice presentation.

Financial Plans are billed 50% in advance. Client may cancel within five business days of signing the Investment Advisory Agreement for a full refund. If cancellation occurs after five business days, client will be entitled to a pro-rata refund based on work completed.

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### **External Compensation for the Sale of Securities to Clients**

highWAY does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of highWAY.

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## **Item 6: Performance-Based Fees**

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

highWAY does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## **Item 7: Types of Clients**

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### **Description**

highWAY generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

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### **Account Minimums**

highWAY charges a minimum annual account fee of \$50 for accounts valued less than \$25,000. However, highWAY reserves the discretion to waive the minimum annual account fee and minimum annual fee as it deems appropriate. .

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## **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

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### **Methods of Analysis and Investment Strategies**

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear.

highWAY applies both an academic and practical analysis of the Modern Portfolio Theory to build risk-managed portfolios that will endure throughout a client's lifetime. In addition, highWAY may employ the analysis and information provided by third-party advisers to evaluate investment products.

The main sources of information include financial newspapers and magazines, research materials prepared by others and corporate rating services.

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### **Investment Strategy and Method of Analysis Material Risks**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

### **Self Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10: Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer or Representative Registration**

Neither highWAY nor any of its employees are registered representatives of a broker-dealer.

### **Futures or Commodity Registration**

Neither highWAY nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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**Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Ashby Financial Services ("AFS") and LPG Insurance Services, Inc. ("LPGIS") are wholly owned subsidiaries of highWAY. AFS is a registered investment advisor. LPGIS offers a range of insurance products including life, long term care, critical care and annuities. Employees of LPGIS are licensed insurance agents. From time to time they will offer clients products from these activities.

The insurance practices represent potential conflicts of interest because it gives them an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent/agencies of their choosing.

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**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

highWAY may at times utilize the services of Third Party Money Managers to manage client accounts. In such circumstances, highWAY will share in the Third Party asset management fee. This situation creates a conflict of interest. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of highWAY. These fees do not include brokerage fees that may be assessed by the custodial broker dealer. Fees for these services will be based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule will be attached to Exhibit D in highWAY's Investment Advisory Agreement.

Prior to referring any clients to third party advisors, highWAY will make sure that they are properly licensed or notice filed with the Department of Corporations.

This relationship will be disclosed to the client in each contract between highWAY and Third Party Money Manager. highWAY does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client will initial highWAY's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including ADV2 disclosures.

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**Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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**Code of Ethics Description**

The employees of highWAY have committed to a Code of Ethics. The purpose of our Code of Ethics is to ensure that when employees buy or sell securities for their personal account, they do not create actual or potential conflict with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

highWAY and its employees do not recommend to clients securities in which we have a material financial interest.

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**Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

highWAY and its employees may buy or sell securities that are also held by clients. In order to avoid potential conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide highWAY with copies of their brokerage statements.

The Chief Compliance Officer of highWAY is Bryan Erickson. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment. Since most employee trades are in products such as mutual funds, government securities, bonds or are small in size, they do not impact the securities markets.

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**Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

highWAY does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

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**Item 12: Brokerage Practices**

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**Factors Used to Select Broker-Dealers for Client Transactions**

highWAY may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. highWAY will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. highWAY relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by highWAY.

- *Directed Brokerage*

In circumstances where a client directs highWAY to use a certain broker-dealer, highWAY still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: highWAY's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients, and potential conflicts of interests arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. highWAY does not exercise discretion over client assets.

- *Soft Dollar Arrangements*

highWAY utilizes the services of custodial broker dealers. Economic benefits are received by highWAY which would not be received if highWAY did not give investment advice to clients. These benefits include: A dedicated trading desk, a

dedicated service group and an account services manager dedicated to highWAY's accounts, ability to conduct "block" client trades, electronic download of trades, balances and positions, duplicate and batched client statements, and the ability to have advisory fees directly deducted from client accounts.

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### **Aggregating Securities Transactions for Client Accounts**

highWAY is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of highWAY. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

## **Item 13: Review of Accounts**

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### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Generally client accounts will be reviewed at the inception of the client relationship and on a recurring basis thereafter as agreed to with the client. Account reviews will be performed by the highWAY representative responsible for the client account with assistance from other member's of highWAY professional staff. These reviews are designed to monitor and analyze client transactions, positions, and investment levels. Particular attention is given to changes in company fundamentals, industry outlook, market outlook and price levels, allocation drift and manager style drift.

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### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of the client's accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

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### **Content of Client Provided Reports and Frequency**

Clients receive account statements no less than quarterly for managed accounts. Account reports are issued by the Advisor's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

## **Item 14: Client Referrals and Other Compensation**

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### **Economic benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

highWAY does not receive any economic benefits from external sources.

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### **Advisory Firm Payments for Client Referrals**

highWAY does not compensate for client referrals.

## **Item 15: Custody**

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### **Account Statements**

All assets are held at qualified custodians which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by highWAY.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

highWAY accepts both discretionary and non-discretionary authority to manage securities accounts on behalf of clients. For non-discretionary clients, highWAY obtains specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. highWAY consults with the client prior to each trade.

The client approves the custodian to be used and the commission rates paid to the custodian. highWAY does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

highWAY does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, highWAY will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided because highWAY does not serve as a custodian for client funds or securities and highWAY does not require prepayment of fees of more than \$500 per client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

highWAY has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions during the Past Ten Years**

Neither highWAY nor its management has had any bankruptcy petitions in the last ten years.

## **Item 19: Requirements for State Registered Advisors**

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### **Principal Executive Officers and Management Persons**

#### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

Accredited Investment Fiduciary (AIF): Accredited Investment Fiduciaries are licensed by the Center for Fiduciary Studies, LLC to use the AIF mark. AIF certification requirements:

- Complete training curriculum
- Pass the 60 questions AIF exam with 75% correct answers
- Sign and agree to abide by a code of ethics
- Complete six hours of continuing professional education, four of which are fi360 Training CE
- Maintain current contact information in fi360's designee database
- Submit yearly renewal application with \$325 in annual dues

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

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**Bryan J. Erickson****Educational Background:**

- Year of birth: 1965
- Chapman University; 1983-1985

**Business Experience:**

- highWAY Financial Networks.; Chief Executive Officer/IAR; 10/2007-Present
- Ashby Financial Services; Owner; 01/2011-Present
- LPG Insurance Services, Inc.; Chief Executive Officer; 12/2001-Present
- Legacy Planning Group, Inc.; Chief Executive Officer; 04/2000-10/2007

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**Other Business Activities Engaged In**

Bryan Erickson has financial industry affiliated businesses as an insurance agent and as an owner of AFS, a registered investment advisor owned by highWAY Financial Networks. From time to time, he offers clients advice or products from the insurance activities. Clients are not required to purchase any products.

These practices represent potential conflicts of interest because it gives them an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent/agencies of their choosing.

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**Performance Based Fee Description**

No Performance Based Fees

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**Disclosure of Material Facts Related to Arbitration or Disciplinary Actions**

None to report

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**Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

None to report

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**Gary J. Sipos MBA, AIF®****Educational Background:**

- Year of birth: 1960
- St. Mary's College; M.B.A.; 2003
- Loyola Marymount University; B.S.E.E; 1983

**Business Experience:**

- highWAY Financial Networks; Executive Vice President/Owner/IAR; 10/2007 – Present
- Gary Sipos Insurance Services; Independent Insurance Agent; 6/2009 – Present
- Legacy Planning Group, Inc.; Executive Vice President; 09/2006 - 10/2007

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**Disciplinary Information**

None to report

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**Other Business Activities**

Gary Sipos is an independent insurance agent. From time to time, he offers clients advice or products from those activities. Clients are not required to purchase any products.

These practices represent potential conflicts of interest because it gives them an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent/agencies of their choosing.

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**Additional Compensation**

Mr. Sipos receives commissions from insurance companies on the products he sells.

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**Supervision**

Gary Sipos is supervised by Bryan Erickson, Chief Compliance Officer. He reviews Gary's work through frequent office interactions as well as remote interactions.

Bryan Erickson's contact information: PHONE: 530-223-1222 EMAIL: info@highwayfinancial.com

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**Arbitration Claims, Self-Regulatory Organization or Administrative Proceeding and Bankruptcy Petition**

None to report

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**Myron H. Ashby CFP®, M.Div.****Educational Background:**

- Year of birth: 1963
- University of California Extension, Santa Cruz; completed Certified Financial Planner (CFP®) and Certificate in Personal Financial Planning; 2004
- Trinity Evangelical Divinity School ; Master of Divinity; 1995
- California State University, San Jose; BS, Aviation; 1991

**Business Experience:**

- highWAY Financial Networks; Financial Advisor/Owner; 01/2011-Present
- Ashby Financial Services; Financial Advisor; 06/2007- Present
- Worldventures; Sales; 05/2010 to Present
- Myron Ashby Insurance Services; Independent Insurance Agent; 4/2010 to Present
- Reinhart Advisory Services; Financial Advisor; 04/2004 - 06/2007
- Medallion Financial Group; Financial Advisor; 04/1998 - 03/2004

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**Disciplinary Information**

None to report

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**Other Business Activities**

Myron Ashby is also a financial advisor with Ashby Financial Services and he is an independent insurance agent. From time to time, he offers clients advice or products from those activities. Clients are not required to purchase any products.

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**Additional Compensation**

Mr. Ashby receives commissions from insurance companies on the products he sells.

These practices represent potential conflicts of interest because it gives Mr. Ashby an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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**Supervision**

Myron Ashby is supervised by Bryan Erickson, Chief Compliance Officer. He reviews Myron's work through frequent office interactions as well as remote interactions.

Bryan Erickson's contact information: PHONE: 530-223-1222 EMAIL: info@highwayfinancial.com

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**Arbitration Claims, Self-Regulatory Organization or Administrative Proceeding and Bankruptcy Petition**

None to report