

# **s<sup>2</sup>(fa)** SCOTT SNOW (financial advisors) LLC

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## **EFFECTIVE DATE** MARCH 31, 2011

This disclosure brochure provides clients with information about the qualifications and business practices of Scott Snow (financial advisors) LLC, an independent investment advisory firm registered with the United States Securities and Exchange Commission ("SEC"). Please contact Scott Snow, Managing Director and Chief Compliance Officer of Scott Snow (financial advisors) LLC, at (440) 871-7669 if you have any questions about the contents of this disclosure brochure.

The information in this disclosure brochure has not been approved or verified by the SEC or by any state securities authority. Registration with the SEC does not imply that Scott Snow (financial advisors) LLC or any individual providing investment advisory services on behalf of Scott Snow (financial advisors) LLC possess a certain level of skill or training. Additional information about Scott Snow (financial advisors) LLC is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Scott Snow (financial advisors) LLC is 121222.

## **ITEM 2 MATERIAL CHANGES**

This disclosure brochure, dated March 31, 2011, was prepared in accordance with the new SEC requirements and rules outlined under Part 2A of Form ADV: Firm Brochure. Pursuant to new SEC rules, we will use this section of the brochure to notify our clients of any material changes within 120 days of the Firm's year-end since our last brochure was updated.

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#### ITEM 4 ADVISORY BUSINESS

Scott Snow (financial advisors) LLC (“s<sup>2</sup>(fa)”), is a privately held Ohio limited liability company that has been providing fee-only investment advisory services and wealth management related services to its clients since it was formed in 2005. s<sup>2</sup>(fa) has been registered with the SEC since its inception in 2005. Throughout this disclosure brochure, the company is referred to as “s<sup>2</sup>(fa)”. The sole owner of s<sup>2</sup>(fa) is Scott Snow.

Scott Snow (financial advisors) LLC (“s<sup>2</sup>(fa)”), provides fee-only investment advisory services and wealth management related services that are tailored to each client (i.e., individuals, pension and profit sharing plans, trusts and private foundations, etc.).

#### INVESTMENT ADVISORY SERVICES

The investment advisory services rendered to clients result in identifying asset allocations that take into account various aspects of a client’s personal circumstances, particularly the client’s age, investment goals and objectives, time horizon, financial circumstances, investment experience, investment restrictions and limitations, and risk tolerance (“client circumstances”).

Depending on the terms of a client’s engagement, s<sup>2</sup>(fa) may provide some or all of the following services:

- Assistance in reviewing the client’s current investment portfolio against the client’s circumstances as disclosed to s<sup>2</sup>(fa) in response to a questionnaire and/or in meetings with an s<sup>2</sup>(fa) financial advisor.
- Discussing with the client and explaining the contents of written disclosures made by mutual funds or outside service providers including broker-dealers and advisers (although the client must understand that s<sup>2</sup>(fa) does not provide legal counsel and that, with respect to legal matters, the client should obtain advice from client’s own legal counsel).
- Preparation of an analysis of the client’s financial circumstances, investment holdings, strategy and goals that reviews basic investment concepts and describes the advantages of diversification.
- Assistance in identifying a targeted asset allocation and portfolio design based on modern portfolio theory and the client’s circumstances. Generally, an Investment Policy Statement is prepared that reflects the client’s circumstances, identifies the target asset allocation and any restrictions imposed.
- Supplying client with mutual fund or investment manager recommendations matched to each asset class identified in the client’s target asset allocation for consideration by the client.
- Monitoring the performance of the client’s investments and reporting to the client, generally on a quarterly basis (more or less frequently if agreed to by the client) with respect to performance of the client’s portfolio against appropriate benchmarks.
- Assisting the client in understanding, accessing, and evaluating the portfolios and strategies employed by mutual funds and/or investment managers. Monitoring and assessing the performance of funds and/or managers in which the client has decided to invest and/or engage, respectively, based on performance reports generated by independent research providers, measured against benchmarks identified by the client and/or s<sup>2</sup>(fa) for each asset class and/or portfolio.
- Proposing changes in the client’s Investment Policy Statement and/or target asset allocation to take into account changes in the client’s circumstances, in the characteristics or performance record of any of the assets in which the client has invested, and/or in the characteristics or performance record of any investment manager engaged by the client.
- Conducting a historical review of the client’s past investment performance.
- Conducting a review and analysis of the client’s current investment policy.
- s<sup>2</sup>(fa) may provide coordinated tax-related advice that may affect the diversification, risk or performance of that client’s portfolio.

In fulfilling the terms of the engagement, s<sup>2</sup>(fa) relies upon the accuracy and completeness of information provided by its clients. s<sup>2</sup>(fa) shall not be required to verify any information received directly from the client or indirectly from the client's other professionals (i.e., accountant, attorney, etc.). It is the client's responsibility to inform s<sup>2</sup>(fa) of changes to his goals and objectives, financial circumstances, investment experience, investment restrictions and limitations, and risk tolerance ("client circumstances") to re-evaluate previous advice related to any changing circumstances. All advice and services provided by s<sup>2</sup>(fa) pursuant to an investment advisory services engagement agreement are intended to be solely for the client's benefit and not for the benefit of anyone else, unless the client and s<sup>2</sup>(fa) otherwise agree in writing.

#### WEALTH MANAGEMENT SERVICES

Periodically, s<sup>2</sup>(fa) may provide its clients with fee-only Wealth Management Services. These services might include one or more of the following:

##### Financial Goal Assessment

- Discussion of overall wealth strategy
- Identification of short, intermediate and long-term financial goals
- Comprehensive review of overall financial situation

##### Multi-Year Cash Flow and Net Worth Statements

- Development and analysis of multi-year cash flow and net worth projections
- Analysis of financial projection to determine ways to achieve both short-term and long-term financial goals
- Annual updates to monitor progress

##### Personal Debt Management

- Assistance with developing a budget, restructuring debt, and mortgage and loan refinancing
- Discussion of cash management strategies

##### Education Funding

- Assistance with establishing needs and objectives
- Assistance with developing a systematic plan for saving
- Identification of appropriate funding sources

##### Retirement Planning

- Assistance with establishing retirement income needs and objectives
- Assistance with developing a systematic plan for saving
- Review of tax and cash flow issues that will be relevant at and after retirement
- Analysis of annuity, lump sum and other distribution options

##### Strategic Annual Income Tax Planning

- Discussion of tax reduction strategies
- Year-end tax projection and planning
- Analysis of withholding and estimated tax payment requirements

##### Financial Service Integration

- Integrate investments with cash flow, retirement, income tax, insurance, business and estate planning
- Coordinate with other advisors to implement the plan effectively

##### Personal Risk Management Review

- Review of current personal and group coverage
- Assessment of survivors' capital needs
- Guidance of appropriate amounts and types of coverage for life, property, casualty and liability insurance

#### Asset Protection

- Discussion of asset protection concepts and issues
- Assistance in implementing asset protection strategies

#### Estate / Business Succession Planning

- Assistance in establishing goals
- Survey of current wills, trusts, beneficiary designations and ownership of assets
- Discussion of ways to minimize tax and direct or distribute wealth
- Recommendations on tax planning strategies and family gifting programs

#### Philanthropic Planning

- Perform initial assessment of philanthropic objectives
- Review of current philanthropic planning
- Discussion of possible charitable planning strategies

In fulfilling the terms of the engagement, s<sup>2</sup>(fa) relies upon the accuracy and completeness of information provided by its clients. s<sup>2</sup>(fa) shall not be required to verify any information received directly from the client or indirectly from the client's other professionals (i.e., accountant, attorney, etc.). Depending on the terms and conditions of the engagement, s<sup>2</sup>(fa) generally provides observations and recommendations to its clients to help them make informed financial decisions based on discussions and/or information provided. Occasionally, s<sup>2</sup>(fa) is requested to provide recommendations to use the services of other professionals (i.e., attorney, accountant, etc.) for implementation purposes. The clients are under no obligation to accept and/or rely upon s<sup>2</sup>(fa)'s recommendations and/or engage recommended professionals. Further, the clients retain absolute discretion concerning all implementation decisions.

#### ASSETS UNDER MANAGEMENT

As of December 31, 2010, the total amount of client assets managed by s<sup>2</sup>(fa) is \$233,000,000. All client assets are managed on a non-discretionary basis.

#### ITEM 5 FEES AND COMPENSATION

s<sup>2</sup>(fa) is a fee-only advisor and is compensated solely by fees paid by its clients and does not receive commissions, referral fees or compensation from any other source (i.e., mutual funds, insurance products or any other investment product).

Generally, clients are presented with an engagement letter summarizing the scope of the services to be provided, agreed upon fee, and terms and conditions of the agreement.

#### INVESTMENT ADVISORY SERVICES

With regard to s<sup>2</sup>(fa)'s fee-only investment advisory services, s<sup>2</sup>(fa) generally charges an annual fee based on a percentage of the market value of the assets being supervised by s<sup>2</sup>(fa) and will generally be in accordance with the following schedule:

##### *Annual Fee*

First \$2,000,000 of assets	1.0%
Next \$2,000,000 of assets	0.80%
Next \$2,000,000 of assets	0.60%
Next \$6,000,000 of assets	0.40%
Next \$6,000,000 of assets	0.30%
Additional assets	0.20%

Such fees are prorated and generally paid quarterly, in advance, based on the market value of the assets on the last day of the previous quarter. Our minimum quarterly fee is generally \$2,500. The fees are negotiable and the timing

of payment varies. Although it is not a requirement that we deduct fees from client accounts, this approach is our standard practice.

s<sup>2</sup>(fa) retains the right to modify fees, including minimum annual fees and minimum account sizes, in its sole and absolute discretion, on a client by client basis based on the size, complexity and nature of the advisory services provided.

A client investment advisory agreement may be terminated at any time, for any reason, upon receipt of written notice. s<sup>2</sup>(fa) also reserves the right to terminate an investment advisory agreement with 60 days advance notice. If such agreement is terminated, a pro rata portion of any quarterly or other fee paid in advance is refunded. For instance, if a client paid a quarterly investment advisory fee of \$2,500 at the beginning of a quarter and terminated s<sup>2</sup>(fa) half-way through the quarter, the client would be entitled to a \$1,250 refund issued by s<sup>2</sup>(fa).

#### WEALTH MANAGEMENT SERVICES

s<sup>2</sup>(fa) charges a fixed or hourly fee for these services based on the scope and complexity of the wealth management engagement and the fee generally ranges from \$2,500 - \$100,000. The fee is negotiable and the timing of payment varies.

If client terminates the wealth management engagement prior to completion, the balance of any s<sup>2</sup>(fa)'s fee shall be refunded to the client. Clients are encouraged to re-engage s<sup>2</sup>(fa) on an annual basis or more frequently as their goals and objectives, financial circumstances, investment experience, investment restrictions and limitations, and risk tolerance change to re-evaluate prior recommendations and determine if they are still applicable to their changing circumstances. All advice and services provided by s<sup>2</sup>(fa) pursuant to a wealth management engagement are intended to be solely for the client's benefit and not for the benefit of anyone else, unless the client and s<sup>2</sup>(fa) otherwise agree in writing.

#### ADDITIONAL INFORMATION

##### *Mutual Fund Fees*

s<sup>2</sup>(fa) only recommends "no-load" mutual funds. All fees paid to s<sup>2</sup>(fa) for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (and money market funds) applicable to their shareholders. These fees and expenses are described in each fund's 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. The client should review both the fees charged by the funds and the fees charged by s<sup>2</sup>(fa) to fully understand the total amount of fees to be paid.

##### *Trading and Other Costs*

All fees paid to s<sup>2</sup>(fa) for investment advisory services are separate and distinct from transaction fees charged by broker dealers associated with the purchase and sale of any securities. In addition, fees do not include the services of any additional client advisors involved, such as accountants, attorneys, executors, etc. Please see the section entitled "Brokerage Practices" on page 8 of this disclosure brochure for additional information on brokerage and other transaction costs.

##### *Direct Debiting of Client Accounts*

In order for s<sup>2</sup>(fa)'s advisory fees to be directly debited from a client's account, the client must provide written authorization permitting s<sup>2</sup>(fa) to bill the custodian. In addition, the account must be held by a qualified custodian and the qualified custodian must agree to send to the client an account statement on at least a quarterly basis. The account statement must indicate all amounts disbursed from the account including the amount of advisory fees paid directly to s<sup>2</sup>(fa). Clients are informed that it is their responsibility to verify the accuracy of the fee calculation and that the account custodian will not determine whether the fee is properly calculated.

#### ITEM 6 PERFORMANCE BASED FEES AND SIDE BY SIDE MANAGEMENT

s<sup>2</sup>(fa) does not receive performance based fees.

## ITEM 7 TYPES OF CLIENTS

s<sup>2</sup>(fa) provides fee-only investment advice to its clients, which generally include:

- Individuals
- Trusts
- Pension and Profit Sharing Plans
- Private Foundations

Minimum account size for investment advisory service clients is generally \$1,000,000 in investable assets, although such minimums may be negotiable.

## ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### INVESTMENT STRATEGIES

The investment strategies rendered to clients result in identifying asset allocations based on modern portfolio theory that take into account various aspects of a client's personal circumstances, particularly the client's age, investment goals and objectives, time horizon, financial circumstances, investment experience, investment restrictions and limitations, and risk tolerance ("client circumstances"). The investment allocation is then matched with various types of investments to produce a diversified portfolio.

### TYPES OF INVESTMENTS

Recommendations for new investments will generally include mutual funds and/or investment managers who invest in domestic and international fixed income and equity securities.

s<sup>2</sup>(fa) may also offer advice relative to private equity, limited partnerships, limited liability companies and hedge fund investments to certain s<sup>2</sup>(fa)'s investment advisory services clients who qualify (i.e., "accredited investors" or "qualified purchasers" defined in Section 203(c) of Regulation D under the Securities Act of 1933 and Section 2(a)(51) under the Investment Company Act of 1940, respectively) and determine that an investment is appropriate given their investment goals and objectives, investment experience, financial circumstances and risk tolerance.

### SOURCES OF INFORMATION

In recommending investments, s<sup>2</sup>(fa) may utilize the following sources of information: financial newspapers and magazines, research materials prepared by others, Morningstar, corporate rating services, annual reports, prospectuses, filings with the U.S. Securities and Exchange Commission and company press releases. In addition to the listed sources of information, s<sup>2</sup>(fa) may participate in analysts' phone conferences and interview references. While s<sup>2</sup>(fa) may base its advice on information obtained from sources that s<sup>2</sup>(fa) believes are reliable, s<sup>2</sup>(fa) cannot guarantee the accuracy of such information.

### RISK

Investing in securities involves risk of loss that each client should be prepared to bear. Typical investment risks include market risk typified by a drop in a security's price due to a company specific event (i.e. unsystematic risk), or general market activity (i.e., systematic risk). In addition, certain strategies may impose more risk than others. For example, with fixed income securities, a period of rising interest rates could erode the value of bond since bond values generally fall as bond yields rise. Investment risk with international equities also includes fluctuation in currency values, differences in accounting and economic and political instability. Depending upon the client need and investment mandate, s<sup>2</sup>(fa) will attempt to thoroughly explain the applicable risks.

## ITEM 9 DISCIPLINARY HISTORY

Neither s<sup>2</sup>(fa) nor any of its supervised persons have any reportable disciplinary history.

## ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Scott Snow, Managing Director of s<sup>2</sup>(fa), belongs to the National Association of Professional Financial Advisors (“NAPFA”). NAPFA is a fee-only organization, independent of s<sup>2</sup>(fa), which requires an annual membership fee. On occasion, leads are generated and either sent to s<sup>2</sup>(fa) directly for follow-up or prospects call Scott Snow directly to learn more about s<sup>2</sup>(fa)’s services.

s<sup>2</sup>(fa) has a preferred provider for preparing client income tax returns. One of the principal owners of our preferred provider is also a client of s<sup>2</sup>(fa). To avoid any potential or perceived conflicts of interest, s<sup>2</sup>(fa) discloses this information when providing a referral to use their services.

## ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

### CODE OF ETHICS

s<sup>2</sup>(fa) has adopted a Code of Ethics that sets forth, among other items:

- Standards governing the business conduct and resolution of conflicts of interest by s<sup>2</sup>(fa) directors and employees (“supervised persons”), which reflect s<sup>2</sup>(fa)’s fiduciary obligations to its clients and its obligations to comply with applicable federal securities laws;
- Internal periodic reporting requirements for s<sup>2</sup>(fa) supervised persons that have access to non-public information concerning s<sup>2</sup>(fa)’s investment activities regarding their personal securities holdings and trading activity;
- Policies governing the treatment of confidential information; and
- Policies regarding gifts and entertainment;
- Supervised persons’ obligations to report Code of Ethics violations to s<sup>2</sup>(fa)’s Chief Compliance Officer.

A copy of s<sup>2</sup>(fa)’s Code of Ethics will be made available to s<sup>2</sup>(fa) clients and prospective clients upon request.

### PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Since s<sup>2</sup>(fa) does not receive any fees or economic benefit from such mutual funds or advisers in any context, therefore, s<sup>2</sup>(fa) does not prohibit any related person from purchasing and selling shares of such investments.

## ITEM 12 BROKERAGE PRACTICES

### BROKERAGE SELECTION

In assessing the desirability of broker-dealers/custodians recommended to clients, s<sup>2</sup>(fa) may take into account, (i) the broker-dealer’s reputation or skill in seeking to provide “best execution” of client orders, operational efficiency and reliability and reputation for integrity and efficiency; (ii) the reasonableness of the levels of commissions, fees and other charges imposed by the broker-dealer/custodian in relation to s<sup>2</sup>(fa)’s assessment of the retail marketplace generally; (iii) the broker-dealer/custodian’s ability and willingness to conform to certain operating and other conditions established by s<sup>2</sup>(fa) for the conduct of various services that it provides to its advisory clients; and (iv) the quality and access of any products, research or services received from a broker-dealer.

s<sup>2</sup>(fa) may introduce investment advisory services clients to broker-dealers/custodians and recommend that the clients open brokerage accounts at such custodians. s<sup>2</sup>(fa)’s investment advisory services clients establishing such accounts are responsible for any brokerage, custodial, and other fees related to maintenance of and transactions in those accounts.

Clients seeking s<sup>2</sup>(fa)’s assistance in selecting a broker-dealer/custodian may be provided with the name of one or various custodians where s<sup>2</sup>(fa) has succeeded in negotiating institutional and/or reduced and sometimes waived commission rates. s<sup>2</sup>(fa) does not have the discretionary authority to determine the broker-dealer to be used. On most occasions, we recommend the use of Charles Schwab & Co., Inc. Institutional Services Group (“Schwab”) (an independent company). It should be noted that we do not require our clients to establish relationships with Schwab or any other specific broker and it is ultimately their decision on where they would like to custody their assets.



#### RESEARCH/SOFT DOLLAR BENEFITS

s<sup>2</sup>(fa) utilizes the services of multiple broker-dealers, including Charles Schwab & Co., Inc. Institutional Services Group (“Schwab”), Citibank, Comerica and Bank of America (“BOA”). While there is no direct linkage between the investment advice given to clients and s<sup>2</sup>(fa)'s use of these broker-dealers, economic benefits are received by s<sup>2</sup>(fa) (i.e., benefits that s<sup>2</sup>(fa) does not pay for), which would not otherwise be received if s<sup>2</sup>(fa) did not direct client trades to these broker-dealers. While s<sup>2</sup>(fa) is not affiliated with these broker-dealers, they may provide s<sup>2</sup>(fa) with access to their institutional trading and operations services, which are typically not available to retail investors. These services may include research, brokerage, custody, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. These broker-dealers may also make available to s<sup>2</sup>(fa) other products and services that benefit s<sup>2</sup>(fa), but may not benefit its clients' accounts. Some of these other products and services assist s<sup>2</sup>(fa) in managing and administering clients' accounts. These include 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 and other market data, facilitate payment of s<sup>2</sup>(fa)'s fees from its clients' accounts, and assist with back office support, record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of s<sup>2</sup>(fa)'s accounts. These broker-dealers also provide s<sup>2</sup>(fa) with other services intended to help s<sup>2</sup>(fa) manage and further develop its business enterprise. These services may include consulting, publications, conferences and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. On occasion, benefits such as educational events and business entertainment of our personnel may be provided. In addition, these broker-dealers may make available, arrange and/or pay for these types of services to s<sup>2</sup>(fa) by independent third parties. These broker-dealers may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to s<sup>2</sup>(fa).

As a fiduciary, s<sup>2</sup>(fa) endeavors to act in its clients' best interests. s<sup>2</sup>(fa)'s recommendation that clients maintain their assets in accounts with a custodian may be based in part on the benefit to s<sup>2</sup>(fa) of the availability of some of the foregoing products and services and not solely on the nature cost or quality of custody and brokerage provided by these broker-dealers which may create a conflict of interest.

#### DIRECTED BROKERAGE

s<sup>2</sup>(fa) does not have the discretionary authority to determine the broker-dealer to be used for their securities transactions. On most occasions, we recommend the use of Charles Schwab & Co., Inc. Institutional Services Group (“Schwab”) (an independent company). It should be noted that we do not require our clients to establish relationships with Schwab or any other specific broker and it is ultimately their decision on where they would like to custody their assets and execute transactions.

While there is no direct linkage between the investment advice given and usage of Schwab or any other broker-dealers, economic benefits are received which would not be received if s<sup>2</sup>(fa) did not give investment advice to clients (please see additional disclosures in the “Research/Soft Dollars Benefits” section directly above). s<sup>2</sup>(fa) does not participate in any transaction fees or commissions paid to the broker-dealer or custodian and does not receive any fees or commissions for the opening or maintenance of client accounts at recommended brokers.

Not all investment advisers require their clients to direct brokerage. s<sup>2</sup>(fa) is required to disclose that by directing brokerage, s<sup>2</sup>(fa) may not be able to achieve most favorable execution of client transactions and that this practice may cost clients more money.

#### TRADE AGGREGATION

s<sup>2</sup>(fa) does not allocate the purchase or sale of securities among client accounts. In rare instances, we may purchase or sell securities that could have been allocated; however, the potential cost savings are insignificant. For instance, if we purchase the same security on a given day for two clients, the \$50 combined trade fees could be reduced to \$25 if the trade was aggregated. Since we don't aggregate, each client ended up paying an additional \$12.50 related to the purchase in this example.

## ITEM 13 REVIEW OF ACCOUNTS

### INVESTMENT ADVISORY SERVICES

For those clients to whom s<sup>2</sup>(fa) provides Investment Advisory Services, account reviews are conducted on an ongoing and continuous basis by Scott Snow (Managing Member) and/or David Abate (Manager) of Scott Snow (financial advisors) LLC. All clients are advised that it remains their responsibility to inform s<sup>2</sup>(fa) of changes to their goals and objectives, financial circumstances, investment experience, investment restrictions and limitations, and risk tolerance (“client circumstances”) to re-evaluate previous advice related to any changing circumstances. All clients are encouraged to review account performance with s<sup>2</sup>(fa) on an annual basis.

#### *Reports*

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the clients’ accounts. Those clients to whom s<sup>2</sup>(fa) provides Investment Advisory Services will also receive a report from s<sup>2</sup>(fa) summarizing account activity and performance no less than quarterly. Clients are urged to compare the account statement provided by the broker-dealer/custodian with those provided by s<sup>2</sup>(fa).

### WEALTH MANAGEMENT SERVICES

Periodically, s<sup>2</sup>(fa) may provide its clients with fee-only Wealth Management Services. These client accounts are only reviewed initially or when additional client requests are made. All client accounts are reviewed by Scott Snow (Managing Member) of Scott Snow (financial advisors) LLC.

## ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

s<sup>2</sup>(fa) does not receive any economic benefit from non-clients for the provision of investment advice to its clients nor does s<sup>2</sup>(fa) retain the services of solicitors.

## ITEM 15 CUSTODY

As mentioned previously, s<sup>2</sup>(fa) deducts its fees directly from client accounts. Custody of client assets will be maintained with the independent custodian selected by the client. s<sup>2</sup>(fa) will not have physical custody of any assets in the client’s account except as permitted for payment of advisory fees. Clients will be solely responsible for paying all fees or charges of the custodian. Clients will authorize s<sup>2</sup>(fa) to give the custodian instructions for the purchase, sale, conversion, redemption, exchange or retention of any security, cash or cash equivalent or other investment for the client’s account.

Clients will receive directly from the custodian at least quarterly a statement showing all transactions occurring in the client’s account during the period covered by the account statement, and the funds, securities and other property in the client’s account at the end of the period. Clients are urged to carefully review the account statement sent by the broker-dealer/custodian and to compare the account statement provided by the broker-dealer/custodian with any reports provided by s<sup>2</sup>(fa).

s<sup>2</sup>(fa) does not take custody of any client assets.

## ITEM 16 INVESTMENT DISCRETION

s<sup>2</sup>(fa) does not have the discretionary authority.

## ITEM 17 VOTING CLIENT SECURITIES

### PROXY VOTING

s<sup>2</sup>(fa) does not vote proxies on behalf of its clients. Therefore, the client maintains exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other types of events pertaining to the client's investment assets. It is our client's responsibility to instruct each custodian of the assets to forward to them copies of all proxies and shareholder communications relating to the client's investment assets. Clients can contact Scott Snow (Managing Member) of Scott Snow (financial advisors) LLC if they have questions regarding a particular solicitation.

## ITEM 18 FINANCIAL INFORMATION

### PREPAYMENT OF FEES

Since s<sup>2</sup>(fa) does not require or accept prepayment of more than \$1,200 in fees six months or more in advance, s<sup>2</sup>(fa) is not required to include a balance sheet with this disclosure brochure.

### FINANCIAL CONDITION

s<sup>2</sup>(fa) does not have any adverse financial conditions to disclose.

### BANKRUPTCY

s<sup>2</sup>(fa) has never been the subject of a bankruptcy petition.