

**EHD Advisory Services, Inc.**

**115 E. King Street  
Lancaster, PA 17602  
Telephone: 717-390-4336  
Facsimile: 717-390-4324**

**WWW.EHDADVISORY.COM**

**3/16/2011**

**FORM ADV PART 2A  
BROCHURE**

**This Brochure provides information about the qualifications and business practices of EHD Advisory Services, Inc. If you have any questions about the contents of this Brochure, please contact us at the phone number listed above. 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 EHD Advisory Services, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for our firm is 127155.**

**EHD Advisory Services, Inc. is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

## Table of Contents

<b><i>Advisory Business.....</i></b>	<b><i>1</i></b>
<b><i>Fees and Compensation .....</i></b>	<b><i>3</i></b>
<b><i>Performance-Based Fees and Side-By-Side Management .....</i></b>	<b><i>4</i></b>
<b><i>Types of Clients.....</i></b>	<b><i>4</i></b>
<b><i>Methods of Analysis, Investment Strategies and Risk of Loss.....</i></b>	<b><i>5</i></b>
<b><i>Disciplinary Information.....</i></b>	<b><i>6</i></b>
<b><i>Other Financial Industry Activities and Affiliations .....</i></b>	<b><i>6</i></b>
<b><i>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</i></b>	<b><i>6</i></b>
<b><i>Brokerage Practices .....</i></b>	<b><i>7</i></b>
<b><i>Review of Accounts .....</i></b>	<b><i>8</i></b>
<b><i>Client Referrals and Other Compensation.....</i></b>	<b><i>8</i></b>
<b><i>Custody.....</i></b>	<b><i>8</i></b>
<b><i>Investment Discretion .....</i></b>	<b><i>9</i></b>
<b><i>Voting Client Securities.....</i></b>	<b><i>9</i></b>
<b><i>Financial Information.....</i></b>	<b><i>9</i></b>
<b><i>Additional Information.....</i></b>	<b><i>10</i></b>

## **Advisory Business**

Form ADV Part 2A, Item 4

### **Description of Services and Fees**

EHD Advisory Services, Inc. is a registered investment adviser based in Lancaster, PA. We are organized as a corporation under the laws of the State of Pennsylvania. We have been providing investment advisory services since 2003. Kenneth Eshleman, Edward Jaeger, Joyce Libby, Joseph Radar, and Curt Stauffer are our firm's owners. Currently, we offer the following investment advisory services, which are personalized to each individual client:

- **Financial Planning Services**
- **Portfolio Management Services**
- **Pension Consulting Services**

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this Brochure, the words "we", "our" and "us" refer to EHD Advisory Services, Inc. and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this Brochure. As used in this Brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

### **Financial Planning Services**

We offer broad-based, modular, and consultative financial planning services. Financial planning will typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. Once we review and analyze the information you provide to our firm, we may deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to our firm. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

We charge a fixed fee for financial planning services, which generally ranges from \$500 to \$1,500. The fee is negotiable depending upon the complexity and scope of the plan, your financial situation, and your objectives. An estimate of the total time/cost will be determined at the start of the advisory relationship. We generally require payment upon completion of services rendered, but we may require that you pay 50% of the fee in advance with the remaining portion upon the completion of the services rendered. In our sole discretion, we may negotiate other fee paying arrangements with you. We will not require prepayment of a fee more than six months in advance and in excess of \$1,200.

You may terminate the financial planning agreement by providing written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the agreement. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

### **Portfolio Management Services**

We offer discretionary and non-discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information

(the "suitability information") at the beginning of our advisory relationship. We will use the suitability information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we may customize an investment portfolio for you in accordance with your risk tolerance and investing objectives. Once we construct an investment portfolio for you, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow our firm to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm, a power of attorney, or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account.

Our fee for portfolio management services is based on a percentage of your assets we manage and is set forth in the following fee schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
Assets up to \$1 million	1.10%
Plus, on assets over \$1 million, but less than \$3 million	0.75%
Plus, on assets over \$3 million, but less than \$5 million	0.65%
Plus, on assets over \$5 million	0.50%

Our fees are automatically debited from your account on the first business day of each month. Management fees are calculated based on average daily market value of assets under management during the previous month.

If the portfolio management agreement is executed at any time other than the first day of a calendar month, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the month for which you are a client. Our advisory fee is negotiable, depending on individual client circumstances.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

We will send you an invoice for the payment of our advisory fee, or we will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. If you find any inconsistent information on statement(s) you receive from the qualified custodian, please call our main office number located on the cover page of this Brochure.

You may terminate the portfolio management agreement upon written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the month for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

#### **Retirement Plan Advisory Services**

We offer advisory services to employer sponsor retirement plans and their Trustees/fiduciaries based upon the needs of the plan and the services requested by the plan sponsor or named fiduciary. In general, these

services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options, education services to plan participants, investment performance monitoring, and/or ongoing consulting related to plan design, administration and/or participant communication efforts. These services will generally be non-discretionary and advisory in nature. The ultimate decision to act on behalf of the plan shall remain with the plan sponsor or other named fiduciary.

We may also assist with participant enrollment meetings and provide investment-related educational seminars to plan participants on such topics as:

- Diversification
- Asset allocation
- Risk tolerance
- Time horizon

Our educational seminars may include other investment-related topics specific to the particular needs of the plan *sponsor and/or participants*.

We may also provide additional types of *advisory* services to plans on an individually negotiated basis. All services, whether discussed above or customized for the plan based upon requirements from the plan fiduciaries (which may include additional plan-level or participant-level services) shall be detailed in a written agreement and be consistent with the parameters set forth in the plan documents. Our advisory fees for these customized services will be negotiated with the plan sponsor or named fiduciary on a case-by-case basis.

Either party to the *advisory* agreement may terminate the agreement upon 30-days' written notice to the other party. The *advisory* fees will be prorated for the quarter in which the termination notice is given and any unearned fees will be refunded to the client.

#### **Types of Investments**

We offer advice on equity securities, certificates of deposit, investment company securities, US Government securities, options contracts on securities, and others. Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

#### **Assets Under Management**

As of December 31, 2010, we manage approximately \$100,000,000 in client assets on a discretionary basis, and approximately \$90,000,000 in client assets on a non-discretionary basis.

## ***Fees and Compensation***

Form ADV Part 2A, Item 5

#### **Additional Fees and Expenses**

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage

fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Brochure.

#### **Compensation for the Sale of Securities or Other Investment Products**

Persons providing investment advice on behalf of our firm may be registered representatives with Summit Brokerage Services, Inc. ("Summit"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. In their capacity as registered representatives, these persons will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by these persons in their capacities as registered representatives is separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm.

Persons providing investment advice on behalf of our firm may also be licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

### ***Performance-Based Fees and Side-By-Side Management***

Form ADV Part 2A, Item 6

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

### ***Types of Clients***

Form ADV Part 2A, Item 7

We provide portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments and municipalities. Advice may extend to corporate entities related to the client, such as small businesses. Client relationships vary in scope and length of service. We do not impose a minimum dollar of assets or other condition for opening or maintaining an account.

## ***Methods of Analysis, Investment Strategies and Risk of Loss***

Form ADV Part 2A, Item 8

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

The methods of analysis utilized by EHD Advisory Services, Inc. in regard to the selection of equity securities is centered around the fundamental analysis of individual securities with an emphasis upon a company's quality of earnings, return on invested capital, management track record of creating shareholder value, and the sustainability of a competitive advantage. Analytical support is derived from our relationship with the Applied Finance Group (AFG), which provides tools that portfolio managers can utilize in order to compare and measure fundamental factors, as well as estimate a fair market value for a particular security. Additional portfolio evaluation, as well as the analysis of mutual funds, is provided by Morningstar Office Suite software. The security screening and selection process is lead by our Chief Investment Officer, who possesses over 12 years of portfolio management experience.

Fixed income analysis and security selection at EHD Advisory Services, Inc. is also heavily influenced by fundamental analysis of the particular bond issuer. The rating of a third party agency such as Standard & Poors, Moody or Fitch is considered, but these ratings are not solely relied upon in order to assess the repayment risk of a particular fixed income security. For corporate bonds, the issuer will undergo analysis similar to that of an equity security and for municipal bonds readily available financial data is evaluated. Fixed income securities are sourced from four or more fixed income brokers and the broker's experience and analysis of a particular creditor is factored into the selection process.

Mutual funds and exchange traded funds are commonly utilized to varying degrees within client portfolios at EHD Advisory Services, Inc. Mutual funds are selected based upon both qualitative factors such as manager tenure and quantitative measures such as category rankings, standard deviation and costs. Where mutual funds are utilized as a strategic allocation within a portfolio, these funds typically will have similar characteristics such as manager tenure of greater than five years and top quartile performance within a comparable peer group over a period of at least five years or longer. Exchange traded funds typically do not have long-term track records and qualitative factors are limited as most of these securities are passively managed strategies. Therefore, exchange traded funds are subject to more quantitative measures of cost and relative performance over periods of time.

Investment Strategies for the equity allocation of client accounts predominately centers on bottom-up security selection and diversification driven by risk control parameters. The risk control parameters dictate in most accounts that no individual equity security will exceed 5% of the aggregate equity allocation and a particular broad financial sector, such as Financials or Technology, cannot exceed 30% of the aggregate equity allocation. The risks of underweighting or overweighting a particular sector relative to a benchmark weighting is not an investment consideration at EHD Advisory Services, Inc. Additionally, the classification of a security in regard to its style (growth or value) is not an investment consideration. For portfolios which hold individual securities, those equity securities can include companies with market capitalization classifications including small, mid and large cap. The vast majority of individual equity securities will typically fall into the mid cap and large cap categories. Individual securities of foreign countries can be owned and are typically done so through the use of American Depositary Receipts (ADR's) which are listed on U.S. stock exchanges. Mutual funds will be utilized for smaller accounts and in larger accounts in order to provide sufficient exposure to asset classes such as small cap and international.

Mutual fund and exchange traded securities are utilized to complement actively managed strategies or are used exclusively in certain accounts where the asset size is not sufficient to implement the portfolio strategy using predominately individual securities. Within individually managed accounts, mutual funds are commonly selected from EHD Advisory Service, Inc.'s mutual fund universe. Mutual funds tend to be strategic allocations, meaning that they provide a client with exposure to an asset class which is integral to achieving the client's long-term objectives. Less frequently, a mutual fund or an exchange traded fund will be utilized tactically, meaning that a security is selected in order to capitalize on an indentified short-term opportunity or mitigate an indentified short-term risk.



EHD Advisory Services, Inc. recognizes that every investment carries various inherent risks such as: principal risk, interest rate risk, market risk, inflation risk, currency risk, timing risk and liquidity risk. The most common definition of risk is "risk of loss". Risk of loss is unavoidable, but not unmanageable. Risk of loss can be greatly diminished through diversification based risk controls, consistently applied fundamental analysis and an objective buy/sell discipline.

Each asset class has unique risk characteristics. For example, fixed income carries interest rate risk, reinvestment risk and default risk. Conversely, equities are known to subject investors to volatility risk. Each stock is associated with an underlying business and as such, business risks such as competition risk, obsolescence risk, and bankruptcy risk can subject an investor to loss of principal if those risks are not sufficiently understood. Mutual funds and exchange traded funds mitigate risk through diversification; however these securities can still be materially affected by many of the same risks as individual securities.

### ***Disciplinary Information***

Form ADV Part 2A, Item 9

EHD Advisory Services, Inc. has been registered and providing investment advisory services since 2003. Neither our firm nor any of our Associated Persons has any disciplinary information.

### ***Other Financial Industry Activities and Affiliations***

Form ADV Part 2A, Item 10

Persons providing investment advice on behalf of our firm may be registered representatives with Summit Brokerage Services, Inc. ("Summit"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation.

In addition to being registered as an investment adviser, our firm is also licensed as an insurance agency. Therefore, persons providing investment advice on behalf of our firm may be licensed as insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. Please see the "Fees and Compensation" section in this Brochure for more information on the compensation received by insurance agents who are affiliated with our firm.

### ***Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***

Form ADV Part 2A, Item 11

#### **Description of Our Code of Ethics**

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we



maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Our Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting us at the phone number listed on the cover page of this Brochure.

#### **Participation or Interest in Client Transactions**

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure.

#### **Personal Trading Practices**

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities.

### ***Brokerage Practices***

Form ADV Part 2A, Item 12

We recommend the brokerage and custodial services of Summit Brokerage Services, Inc. ("Summit"), a securities broker-dealer and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. We believe that Summit provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by Summit, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services Summit provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

#### **Directed Brokerage**

Persons providing investment advice on behalf of our firm who are registered representatives of Summit will recommend Summit to you for brokerage services. These individuals are subject to applicable rules that restrict them from conducting securities transactions away from Summit unless Summit provides the representative with written authorization to do so. Therefore, these individuals are generally limited to conducting securities transactions through Summit. It may be the case that Summit charges higher transactions costs and/or custodial fees than another broker charges for the same types of services. If transactions are executed through Summit, these individuals (in their separate capacities as registered representatives of Summit) may earn commission-based compensation as result of placing the recommended securities transactions through Summit. This practice presents a conflict of interest because these registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. You may utilize the broker-dealer of your choice and have no obligation to purchase or sell securities through such broker as we recommend. However, if you do not use Summit, we may not be able to accept your account. Please see the "Fees and Compensation" section in this Brochure for more information on the compensation received by registered representatives who are affiliated with our firm.

#### **Block Trades**

We combine multiple orders for shares of the same securities purchased for discretionary accounts; however, we do not combine orders for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with our firm.

## **Review of Accounts**

Form ADV Part 2A, Item 13

*Portfolio Managed Accounts:* Our Associated Person assigned to your managed account will monitor your account(s) on an ongoing basis and will conduct account reviews at least annually to ensure the advisory services provided to you are consistent with your stated investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

We may provide you with additional or regular written reports in conjunction with account reviews. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s).

*Financial Planning Accounts:* We will review your financial plan only at your request. Otherwise, we do not review or monitor your financial plan.

## **Client Referrals and Other Compensation**

Form ADV Part 2A, Item 14

We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

Please refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from our relationship with Summit.

As disclosed under the "Fees and Compensation" section in this Brochure, persons providing investment advice on behalf of our firm are licensed insurance agents, and are registered representatives with Summit, a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. For information on the conflicts of interest this presents, and how we address these conflicts, please refer to the "Fees and Compensation" section.

## **Custody**

Form ADV Part 2A, Item 15

We directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent qualified custodian. You will receive account statements from the

independent qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact us at the phone number on the cover page of this Brochure.

### ***Investment Discretion***

Form ADV Part 2A, Item 16

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement and/or trading authorization forms.

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s).

### ***Voting Client Securities***

Form ADV Part 2A, Item 17

#### **Proxy Voting**

EHD Advisory Services, Inc. generally will monitor proposed corporate actions and proxy issues regarding client securities, and may take any of the following actions based upon reasonable judgment of the vote most likely to produce favorable financial results for the client. The following actions may be taken based upon the best interest of the client: (i) determine how to vote the proxies, (ii) abstain, or (iii) follow the recommendations of an independent proxy voting service in voting the proxies.

The full text of EHD Advisory Services, Inc.'s proxy voting policy will be provided upon request.

### ***Financial Information***

Form ADV Part 2A, Item 18

We are not required to provide financial information to our clients because we do not:

- require the prepayment of more than \$1,200 in fees and six or more months in advance, or
- take custody of client funds or securities, or

- have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

## ***Additional Information***

### **Your Privacy**

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact us if you have any questions regarding this policy.

### **Trade Errors**

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will not keep the profit.