

ADV Part 2

March 8, 2012

Holt-Smith Advisors, Inc.

5201 East Terrace Drive, Suite 380
Madison, WI 53718

Phone: 608-249-4488

Fax: 608-249-7988

Email: hsa@holtsmithadvisors.com

Website: www.holtsmithadvisors.com

This brochure provides information about the qualifications and business practices of Holt-Smith Advisors. If you have any questions about the contents of this brochure, please contact us at 608-249-4488 or hsa@holtsmithadvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state security authority.

Additional information about Holt-Smith Advisors is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Material changes since the last annual update of the ADV Part 2 Brochure filed on March 28, 2011.

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

Restriction of contributions to charitable organizations was deleted. The paragraph now states:

Our employees are prohibited from making political contributions for the purpose of obtaining or retaining advisory contracts with government entities. In addition, our employees are prohibited from considering our current or anticipated business relationships as a factor in soliciting political contributions.

Item 3: Table of Contents

Item 4: Advisory Business	4
Item 5: Fees and Compensations	5
Item 6: Performance Based Fees.....	6
Item 7: Types of Clients.....	6
Item 8: Method of Analysis, Investment Strategies and Risk of Loss.....	7
Item 9: Disciplinary Information	8
Item 10: Other Financial Industry Activities and Affiliations	8
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading ..	9
Item 12: Brokerage Practices	10
Item 13: Review of Accounts	12
Item 14: Client Referrals and Other Compensation.....	13
Item 15: Custody.....	13
Item 16: Investment Discretion.....	13
Item 17: Voting Client Securities	14
Item 18: Financial Information	14
Item 19: Other Information.....	14

Item 4: Advisory Business

Holt-Smith Advisors is an independent, investment advisory firm based in Madison, Wisconsin. We provide investment management solutions to fit clients' life situations, risk tolerances and long-term financial objectives. Marilyn Holt-Smith, who currently owns 100% of the firm, founded the business in 1987.

We offer portfolio management services including single equity strategies, fixed income strategies, and diversified portfolios. We perform these services for the following classifications of clients:

- Individuals, couples, and families including trusts,
- Individuals with Rollover, Roth, or Inherited IRAs,
- Corporate retirement plans covered by ERISA,
- Union retirement plans under Taft Hartley,
- Public pension plans,
- Insurance companies,
- Endowments, foundations and other nonprofit organizations, and
- Third-party sponsored separately managed accounts (also called wrap accounts.)

We provide our clients with total asset management solutions designed to meet a wide array of investment objectives, including asset allocation, capital appreciation, income generation, cash flow assessment, tax minimization, or estate consideration. Additional fees may be charged for these Wealth Management Services depending upon the complexity and depth of the client's needs.

For our individual investors in our Wealth Management area, we tailor investment solutions to our clients, building relationships through in-depth discussions of financial goals and a comprehensive analysis of the client's current investments. Our team reviews tax liabilities, income goals and market experiences to aid the client in determining their financial objectives and risk tolerances. We work with the client to design a diversified portfolio using our in-house actively managed equities and fixed income strategies, as well as Exchange Traded Funds ("ETF's") when appropriate.

As of December 31, 2011 we managed \$181 million for discretionary accounts. We don't have any assets under management in non-discretionary accounts.

We currently participate in separately managed account programs offered by unaffiliated, third party providers. A client enters into an agreement with this sponsor, usually a registered broker/dealer. We do not serve as a separately managed account sponsor but we enter into agreements with them to provide specific investment strategies to their clientele. Separately managed accounts (commonly referred to as wrap accounts) offer a method for individual investors to hire multiple money managers. The client is charged a fee by the sponsor that includes the management fees of each money manager as well as all transactions and operations. These costs are "wrapped" together so the client is paying a set percentage of the assets they

have under management. The sponsor of these accounts is responsible for all servicing and maintaining the client relationship.

Separately managed accounts are managed in the same manner as dictated by the particular strategy chosen as our other client accounts in the same strategy. Based on our agreement with the sponsor, we are compensated by the sponsor of each separately managed account program. Our fee is a percentage of a total fee charged to the client by the sponsor.

Item 5: Fees and Compensations

Our fees are based on the clients' assets under management as determined by their portfolio's asset value at the end of each calendar quarter.

Our standard fee schedule is as follows:

- 1.00% annualized of the first \$5 million assets under management
- 0.70% annualized over \$5 million assets under management

Fees for institutional clients may vary and are negotiated on an individual basis. For individual clients we normally charge a minimum annualized fee of \$2,500.

Fees are computed and payable quarterly in advance based on the valuation of each portfolio's assets under management on March 31, June 30, September 30 and December 31. Fee rates may not be changed without 60 days advance written notice to the client. Quarterly fee invoices are sent directly to the client. Client has an option to have the fees deducted directly from their custodial accounts or may choose to pay us directly.

Our separately managed account clients, also called wrap account clients, are charged a bundled fee by the wrap program sponsor. The bundled fee includes fees related to custody, brokerage commissions, investment management and other services as negotiated between the client and the wrap program sponsor. The wrap program sponsor calculates and pays us a fee quarterly for providing investment management services based on a percentage of account market values. This quarterly fee is either paid to us in advance or in arrears based on the wrap program sponsor's practices.

We may use outside registered investment companies, such as money market funds, and exchange-traded funds (ETFs) when managing client accounts. Clients are responsible for shareholder fees imbedded within the share price of these securities, and those fees are in addition to our fees described above. Please see Item 12 for additional information on our brokerage practices.

Client portfolios are held at a qualified third party custodian such as TD Ameritrade or Charles Schwab & Co., Inc. Normally, there are no custodial fees for these arrangements. If a client chooses a different custodian, such as a bank trust department, the trust company may charge a fee to custody the assets.

Clients pay brokerage and other transaction costs resulting from trading securities. See Item 12. Brokerage Services for more details.

We charge fees in advance for no more than one quarter. For instance, management fees for the first calendar quarter are usually collected in January and cover our services of the months of January, February and March. In the event of the termination of our services by a client, any unearned portion of fees previously paid is fully refundable. A client may terminate our investment advisory agreement at any time by written notice to us. The refunded fees are prorated by the days remaining in the calendar quarter.

Our firm is compensated only for the management of investment portfolios and related investment advice. Our firm earns more in fees when a client's account increases in value and we retain a satisfied client. We experience an inherent conflict as we have an incentive to favor those clients paying the most fees in order to earn the highest possible compensation. In practice, we believe this conflict is controlled as: 1) we are not paid any compensation for the transaction of securities or recommendation of other investment products; and 2) we maintain policies and procedures designed to ensure clients are treated fairly over time.

Where we are responsible to price a client's portfolio for fee billing or investment performance calculation purposes, we generally use pricing information provided by an independent pricing service (Interactive Data Corporation). When we are unable to obtain a price for a security or we strongly believe that the price from standard sources does not reflect the security's fair market value, members of the Fixed Income or Equity Committee determine a fair valuation for that security.

There may be a conflict when fair valuing securities, as we have an incentive to value these securities higher in an effort to generate greater fees and higher investment returns. We have controls in place to mitigate this conflict, including policies and procedures designed to provide reasonable assurance securities are valued properly. We encourage our clients to cross check our reports with their custodial statements.

Item 6: Performance Based Fees

We do not charge performance based fees. All our fees are based on assets in each client's managed account.

Item 7: Types of Clients

We provide services to the following classifications of clients:

- Individuals, couples, and families including trusts,
- Individuals with Rollover, Roth, or Inherited IRAs,
- Corporate retirement plans covered by ERISA,
- Union retirement plans under Taft Hartley,
- Public pension plans,
- Insurance companies,
- Endowments, foundations and other nonprofit organizations, and

- Third-party sponsored separately managed accounts (also called wrap accounts.)

Our minimum for an individual account is \$250,000.

We may manage investment accounts on behalf of our employees or their relatives. Such arrangements may represent an inherent conflict of interest, as we may have an incentive to treat such clients more favorably than others. We believe that our policies and procedures, including our practices described within the document, minimize this potential conflict.

Item 8: Method of Analysis, Investment Strategies and Risk of Loss

We develop and use our own investment strategies and processes in managing our clients' portfolios. These unique strategies are combined, as appropriate, for each client's individual situation. The various strategies that are used include Tactical Asset Allocation, Large Cap Growth, Mid Cap Growth, Large Cap Value and Fixed Income.

There is an inherent risk in investing in marketable securities. Securities markets can and do fluctuate in value as economic, political, and geographical events unfold. The ability to execute transactions in a favorable way may be constrained by the liquidity and functionality of not just the U.S. but world markets. Clients may lose value from the fluctuation of their securities.

We use one or a combination of our strategies based on a client's situation. The use of one, several or all strategies are thoroughly discussed and agreed to by the client prior to investing the client's assets.

The investment strategies we offer include:

Tactical Asset Allocation

This strategy manages diversified equity portfolios based on our assessment of macroeconomic data from the U.S. and international markets. We position a portfolio based on our assessment with reviews completed at least quarterly. The review includes various market sectors' outlooks, the economy, interest rates, inflation, fiscal policy, monetary policy, liquidity, as well as previous market and sector results. Changes to the strategy are implemented as needed.

Equity style weighting decisions are made with respect to Growth vs. Value stocks, Large, Mid and Small sized companies and Domestic vs. International stocks. We strive to control risk and volatility by imposing maximum and minimum constraints on style and sector exposures. We utilize Exchange Traded Funds to supplement the equity portfolio.

Large Cap Growth

Our Large Cap Growth equity strategy is made up of companies we believe, based upon our research, are fundamentally strong with above-average growth prospects and attractive valuations. This concentrated strategy holds 25-30 large companies with a market valuation of \$5 billion and over at purchase. We use the Russell 1000[®] Growth Index as the benchmark for this strategy. This benchmark is a subset of the 1000 largest companies in the U.S., focusing on those companies with higher price-to-book values and growth characteristics. Our screening

process follows multiple growth factors when selecting potential investments. We monitor holdings for fundamental and valuation changes and compatibility with portfolio structure. Risks are controlled with limits on industry sector concentration, not owning direct competitors and disciplined pare-backs.

Large Cap Value

This strategy selects companies with size of \$5 billion and over at purchase. It is an actively managed, concentrated portfolio with the Russell 1000[®] Value Index as its benchmark. This benchmark is a subset of the largest 1000 U.S. companies and focuses on companies trading with lower price-to-book valuations and lesser growth characteristics. Using our proprietary model, our team selects companies we believe are under-valued with solid fundamentals, solid dividend generation, and strong price appreciation potential. Risk is controlled by limits on industry sector concentration and predetermined price targets. The portfolio holds 20-30 companies.

Mid Cap Growth

Our Mid Cap Growth strategy selects companies we believe, based upon our research are fundamentally strong with better-than-average expected sales and earnings growth. The portfolio is concentrated with 30-40 holdings. Company sizes are usually between \$1 and \$20 billion at purchase. We use the Russell Midcap Growth[®] Index as the benchmark. This benchmark is a subset of the Russell Midcap[®] Index but focuses on the companies with growth characteristics. The risk control is based on the same principles as risk control for Large Cap Growth strategy, setting limits on industry sector weights, not owning direct competitors and position size control through disciplined pare backs.

Fixed Income

Our Fixed Income approach can be used as a separate strategy or as a part of balanced portfolio. This strategy is focused on intermediate fixed income securities such as corporate, government or municipal bonds. Fixed income Exchange Traded Funds may be used instead of individual bond securities depending on strategy and portfolio size. The Fixed Income strategy is actively managed by lengthening or shortening the portfolio's average maturity based on interest rates trends.

Item 9: Disciplinary Information

We have no disciplinary events to disclose.

Item 10: Other Financial Industry Activities and Affiliations

We have no activities or affiliations to report. In addition, we do not receive compensation directly or indirectly from recommending other advisors to our clients.

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

Our Code of Ethics and Personal Trading Policy establishes standards of conduct and procedures to reasonably ensure every partner, director, officer and employee uphold their fiduciary duty to the clients. The purpose of the Code is to establish procedures with the following general principles:

- Honesty, integrity and trust should be the minimum requirements of professional conduct for employees of the firm.
- The interests of clients will always be placed ahead of any employee's own personal investment interests.
- Employees will conduct their personal securities transactions in accordance with the Code, so as to avoid any actual or perceived conflicts of interest, and any abuse of position of trust and responsibility.
- Employees will not take inappropriate advantage of their position with Holt-Smith Advisors.
- Diligence and care will be taken in maintaining and protecting non-public information concerning our clients.
- Non-public inside information shall not be used in connection with trading in personal accounts and on behalf of our clients, including trading on non-public information related to any affiliated mutual fund.

As part of the Code, we require employees to obtain advanced approval before serving on a board of a publicly traded company. We place limits on the value of gifts employees may receive from any person or entity doing business with us or on behalf of any of our clients. We require employees to report any violation of the Code to our management.

Our employees are prohibited from making political contributions for the purpose of obtaining or retaining advisory contracts with government entities. In addition, our employees are prohibited from considering our current or anticipated business relationships as a factor in soliciting political contributions.

Marilyn Holt-Smith, our President, serves on the board of directors of SB Bancorp, Inc. and its subsidiary, Settlers Bank, based in DeForest, WI. She is a shareholder in the company. To avoid any appearance of a potential conflict of interest we do not make recommendations regarding investments with SB Bancorp to clients.

We don't recommend, buy or sell for clients securities in which either we or a related person has a material financial interest.

Our Code of Ethics outlines our guidelines for employees' personal trading. Our employees may purchase or sell securities also recommended for clients. Employees have to obtain advance approval before trading securities in their personal accounts. We do not require advance approval for certain securities where an employee has limited control over the purchase or sale of a security, including transactions in automatic investment plans. Such transactions are still subject to the reporting requirements outlined below. The trading requirements apply equally to

securities we recommend for clients, and to securities we would generally not recommend for client accounts, including investments in private companies.

We prohibit the purchase or sale of securities within a 24-hour period before and after the firm has traded that same security. However, we permit the purchase or sale of equity securities with a market value of greater than \$5 billion without regard to this 48-hour blackout period. These de minimus transactions are not exempt from the personal securities reporting or advance approval requirements.

All employees are required to provide a quarterly report of personal securities transactions. In addition they have to report personal securities holdings when hired by the firm and on an annual basis. Certain securities, as permitted by law, are not required to be reported quarterly, including U.S. Government securities and open-end mutual funds but are required to be disclosed on annual reports.

Exceptions to the Code may be extended in rare circumstances with the approval of the President. Exceptions will only be granted in circumstances where strict adherence to the rules results in the unfavorable treatment to any client, or inequitable or unfair treatment to an employee with no harm to any client. In no circumstances will an exception be granted which is likely to harm any client.

Upon a client or prospective client's request, we will provide a copy of our Code of Ethics.

Item 12: Brokerage Practices

We determine in most cases which securities are bought or sold, the broker-dealer through which the securities are to be traded and related commission rates.

It is our policy to seek the best execution at the best security price available with respect to each transaction, in light of the overall quality of brokerage and research services provided to the firm and clients. We select broker-dealers based on many factors, including:

- Quality of research and research services, including the generation of new ideas
- Access to research analysts
- Adequacy of capital
- Ability to trade large blocks of securities
- Acceptable record keeping, delivery and payment systems
- Competitive commission structure
- Best price on securities
- Reputation and integrity

Our authority to select brokers presents an inherent conflict, as we may face an incentive to choose brokers who provide us with research services. To mitigate this conflict, we maintain policies and procedures designed to ensure we select brokers based on our fiduciary obligations, and not based on this conflict. In addition, all brokerage relationships are monitored continuously by the portfolio management staff. The Brokerage Committee, consisting of the

President, the Chief Investment Officer, a Portfolio Manager and the Chief Compliance Officer is responsible for overseeing and evaluating all broker-dealer relationships and the quality of services received. Members of the Brokerage Committee who also trade throughout the year evaluate brokers on an annual basis. Each broker is scored based on several criteria, including access to website and quality research, and generations of new ideas.

Investment research services we receive play an important role in our investment management process. We may pay a broker a greater commission than what another broker might have charged for effecting the same transaction, in recognition of the value of research services provided by the broker. These arrangements, generally known as “soft-dollar arrangements”, are not used solely for the accounts that generate the brokerage commission, but may be used in servicing any or all of our accounts. Research services we receive from broker-dealers are supplemental to our research effort, and we may allocate brokerage for research services that could otherwise be available for cash. Therefore, we are relieved from paying certain expenses we might otherwise be required to pay. If we paid directly for all research, the clients may receive lower commission charges. However, practically speaking, we would need to increase management fees to cover these costs as third-party research is a contributing asset to our investment decision making process. It is our policy to use commission dollars only to benefit that investment decision making process and, thereby, the results of that process.

Research services furnished by broker-dealers will be used in servicing or generating investment ideas for all clients’ accounts. However, each and every research service may not be used to service each and every client account, and brokerage commissions paid by one account may apply toward payment for research services that may not be used in the service of that account. Research services are received primarily in the form of written reports and publications, computer generated services and telephone conference calls and conversations. We consider the quality of the research services provided by brokers to be of great importance to both us and our clients. Examples of research services include economic and financial market analysis and forecasts, industry and company specific analysis, interest rate forecasts and analysis of U.S. Treasury securities. We also use electronic research services, such as Fact Set software program, which provide electronic news and research. We expect the majority of client commissions will be used for acquiring research through soft dollar arrangements.

We do not select or recommend broker-dealers based on their potential client referral. We do not receive referrals from broker-dealers.

We do not require a client to direct us to execute transactions through a specific broker but we do permit a client to do so. Where clients direct us to use a certain broker-dealer for all or a portion of the transactions, the client is requested to do so in writing. If we are directed to place trades with a specific broker-dealer, the client may forgo any benefit from savings on execution costs that we could obtain for other clients, such as negotiating volume discounts on block trade orders. The client’s specific brokerage direction may incur higher commission costs for that particular account. The custody of client assets by a broker-dealer will be treated as a direction by the client to execute all transactions through that broker-dealer.

We may block trade orders of clients that have directed us to place their trades with a specific broker. If a blocked trade order is created, clients receive the average execution price but may

pay disparate commission rates. Participating clients' commission rates may vary if the client negotiated a different commission rate or if the client has a directed brokerage relationship. Wrap accounts do not participate in block trade orders, as trades for wrap accounts are generally executed through the sponsor's broker-dealer.

When appropriate, clients may choose to hold their accounts with Charles Schwab & Co., Inc. an independent and unaffiliated broker-dealer, to participate in the Prime Brokerage Services offered through Schwab. We maintain a Prime Brokerage Services Agreement with Schwab for the benefit of our clients. Prime Brokerage Service is designed to give us the ability to execute transactions on behalf of the clients with broker-dealers other than Schwab. Clients pay a separate transaction fee to Schwab for this service, currently \$15 per transaction. To qualify for the Prime Brokerage Account Service each client account must maintain a minimum market value, currently \$100,000 per account. If the market value of the account is less than \$100,000, the trade is placed at Schwab and the client will pay commissions according to Schwab's disclosed commission schedule. Clients can choose the same arrangement with TD Ameritrade.

If and when there is a need to correct a trade or administrative error, it is our practice to make the client financially whole in correcting that error. We may at times compensate a client for trade or administrative errors resulting in a loss via a reduction in the client's account fees. We do not use soft dollars to compensate clients for trade or administrative errors.

Wrap account sponsors may apply separate trade error correction policies to applicable wrap accounts. In these cases, we follow the sponsor's trade error correction policies.

Addressing trade errors presents a true conflict to all advisers, including us, as we have a financial incentive to minimize a trade error resulting in a loss and to maximize a trade error resulting in a gain. To mitigate this conflict, we maintain policies and procedures designed to provide reasonable assurance trade errors are properly addressed.

Item 13: Review of Accounts

We have three levels of review in overseeing our clients' portfolios:

- a. Investment strategy review done by the Investment Team. The Team includes key investment decision makers, who are the Senior Portfolio Managers and Portfolio Managers. The Team is responsible for continuous evaluation of portfolio structure and securities.
- b. Each Senior Portfolio Manager, Portfolio Manager and Manager of Wealth Management is assigned to specific accounts. These professionals review their accounts frequently to ensure that each portfolio is in line with clients' investment strategy and any client restrictions.
- c. Our Chief Investment Officer, who is also a Senior Portfolio Manager, reviews all client accounts quarterly to make sure that their overall asset allocation and performance is in line with their investment guidelines.

We provide our clients with comprehensive written quarterly reports. These reports give clients a detailed picture of assets in the portfolio, interest and dividend income, securities transactions, all

additions and withdrawals and investment performance. Besides written reports, clients are offered, as often as quarterly, conference calls or meetings with us to review their portfolio status and to keep us current with their changing needs and objectives.

In addition to the regular reports, clients receive monthly statements from their account custodian. While we regularly reconcile our internal accounting system to the balances of the custodian records, certain differences routinely occur and often exist due to the timing of entries made to each system. We encourage clients to contact us with any questions regarding their account statements.

Item 14: Client Referrals and Other Compensation

Although currently we are not doing so, from time to time, we may compensate parties not employed by us for new business referrals. Such cash payments will be made pursuant to a written agreement between the solicitor and us. The solicitor, as required by the written agreement, will provide certain disclosures regarding the referral arrangement to the client including details of the compensation arrangement.

Item 15: Custody

We maintain custody only to the extent we can withdraw advisory fees from clients' accounts. All clients' assets are held by a broker-dealer, bank or other qualified custodian. We don't route original custodial statements to our clients on behalf of a custodian; they are provided directly to the client by the custodian. At a minimum, clients receive statements from custodians on a quarterly basis with the majority receiving them monthly. We recommend clients review their statements regularly.

We provide clients with quarterly reports showing their assets, performance and other supplementary information as mentioned in Item 13 Review of Accounts. We recommend that clients compare the information in our quarterly reports to the information on their custodial statements.

Item 16: Investment Discretion

Generally, we are authorized with full investment discretion (we can buy and sell securities in clients' accounts without their prior consent) for all of our client accounts. The discretionary authority is provided under our written Investment Management Agreement, however at any times, clients can specify the limits of the full discretion in writing. While we make all investment decisions on behalf of our clients, we do permit clients to impose restrictions on investing in certain securities or other mutually agreed upon limitations.

We manage separately managed accounts (also called wrap accounts) with full discretion. Our discretionary authority may be limited by conditions imposed by clients through the sponsor in their stated investment guidelines or in written instructions provided to us.

Item 17: Voting Client Securities

Clients may choose whether they want us to vote their proxies on their behalf. When the responsibility for voting their proxies rests with us, we strive to vote in their best interest. In general we vote for proposals that, in our opinion, will increase shareholder value. The final decision of how to vote a proxy rests with our Investment Team (same as our Equity Team). When voting client proxies, it is possible for us to encounter a material conflict of interest. If a member of the Investment Team has a material personal or familial conflict of interest, the employee is removed from the decision-making process. If a member of proxy voting staff has a material conflict of interest, a member of the senior management or compliance department will oversee the administrative entry of the proper vote. If the firm has a material conflict with a business relationship, we will engage an independent party to determine how to vote the proxy. Upon client request, we will provide a copy of the firm's Proxy Voting Policy. Also upon client request, we will provide a report describing how we voted the client's proxies.

If clients choose to retain authority to vote proxies, they will receive the information directly from their custodian. They are then responsible for voting their proxies. Clients are always encouraged to contact us if they have any questions.

Item 18: Financial Information

We are not aware of any current financial conditions that would prevent us from meeting our contractual commitments to our clients.

Item 19: Other Information

Class Actions and other Legal Proceedings

We do not participate in legal proceedings including class actions on behalf of our clients. We may assist the client by forwarding claims to the client and by providing supporting documentation. However, the final determination of whether to participate, and the completion and tracking of any such related documentation shall generally rest with the client.



Rev. 03/2012

FACTS

WHAT DOES HOLT-SMITH ADVISORS DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and name, address, age and income
- net-worth, risk tolerance and investment experience
- account balances, beneficiary information and employment

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Holt-Smith Advisors chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Holt-Smith Advisors share?	Can you limit this sharing?
For our every day business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes - to offer our products and services to you	No	We don't share
For joint marketing with other companies	No	We don't share
For our affiliates' everyday business purposes information about your transactions and experience	No	We don't share
For our affiliates' everyday business purposes information about your creditworthiness	No	We don't share

Questions?

Call 608-249-4488 or go to www.holtsmithadvisors.com

What we do

How does Holt-Smith Advisors protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Holt-Smith Advisors collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ enter into advisory contract or seek financial advice ■ tell us about your investment or retirement portfolio or provide account information ■ give us your income information
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Holt-Smith Advisors has no affiliates.</i>
Nonaffiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Nonaffiliates we share with can include custodians, broker/dealers, data processors, government agencies, software providers, your designated accountants and your designated legal representatives.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Holt-Smith Advisors doesn't jointly market.</i>