



## **Form ADV Part 2 – Disclosure Brochure**

**Effective: March 22, 2012**

This Brochure provides information about the qualifications and business practices of Yeske Buie Inc. ("Yeske Buie"). If you have any questions about the contents of this Brochure, please contact us at (703) 538-2116.

Yeske Buie is a Registered Investment Advisor registered with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an Investment Advisor does not imply any specific level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Additional information about Yeske Buie and its advisory persons are available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

**Yeske Buie Inc.**  
**CRD No: 143234**

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**San Francisco, California 94104**

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## Item 2 - Material Changes

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Form ADV 2 is divided into two parts, *Part 2A* and *Part 2B*. *Part 2A* of the new Form (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* of the new Form (the “Brochure Supplement”) requires an Advisor to provide information about certain advisory personnel.

Yeske Buie believes that communication and transparency are the foundation of our relationship and continually strives to provide its Clients with complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last distribution to Clients.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a summary of Material Changes shall be provided to each Client annually or if a material change is made.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Advisor Public Disclosure website at <http://advisorinfo.sec.gov>.

To review the firm information for Yeske Buie,

- Click **Investment Advisor Search** in the left navigation menu and enter.
- Select the option for Investment Advisor Firm and enter **143234** (*our firm’s CRD number*) in the field labeled “Firm IARD/CRD Number”.
- ADV Part 1 will be displayed.
- This will provide access to Form ADV 1 and 2A.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions.
- On the left navigation, Form ADV Part 2A is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (703) 538-2116.

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## Item 4 – Advisory Services

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### A. Firm Information

Yeske Buie Inc. (“Yeske Buie”) is a registered investment advisor with the U.S. Securities and Exchange Commission. Yeske Buie is a corporation formed under the laws of the State of California in 2007 that conducts business in Virginia, California and other states. Yeske Buie is owned and operated by Dr. Dave Yeske and Elissa Buie.

### B. Advisory Services Offered

#### Wealth Management Advisory Services

Yeske Buie is a wealth management firm, offering integrated financial planning and asset management services. Yeske Buie has developed a Client Service model that includes discovery, implementation and monitoring components. Upon entering into an advisory agreement, Yeske Buie will begin a process of Client discovery. Yeske Buie seeks to learn about a Client’s goals and objectives, values and beliefs, risk tolerance and capacity and as much other financial and non-financial information as possible.

#### Financial Planning Services

Financial planning is a process and may include a review of a Client’s net worth (including assets and liabilities), objectives, risk tolerance, risk capacity, cash flow and expenses, income tax analysis, review and analysis of fringe benefits, retirement forecast and probability analysis, educational funding analysis, estate planning analysis and risk management review. Yeske Buie’s approach to providing this service starts with a formal discovery process designed to help understand the Client’s current financial and subjective information. Yeske Buie assesses the Client’s goals, objectives, time horizon, and other factors to compare where the Client is today in relation to the attainment of their stated goals. A series of analyses, policies and recommendations are developed to facilitate the attainment of the Client’s goals and objectives based on what is truly important to the Client.

#### Asset Management Services

Yeske Buie provides continuous, active management of Client investment portfolios. Based on the information provided by the Client, Yeske Buie will furnish the Client with an Investment Policy Statement (“IPS”) that summarizes the Client’s portfolio targets and objectives. Working within these investment policies, Yeske Buie will implement this target portfolio using specific securities as Yeske Buie deems appropriate at the time. Adherence to this target portfolio will be monitored on an ongoing and regular basis. The overall investment policies and target portfolios will be reviewed periodically.

In performing its services, Yeske Buie trusts that the Client will provide accurate information and Yeske Buie will not be obligated to verify any information received from the Client or from the Client’s other professionals. If requested by the Client, Yeske Buie may recommend the services of other professionals for purposes of implementing the strategy. The Client is under no obligation to engage the services of any such recommended professional. The Client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation from Yeske Buie. Moreover, Clients are advised that it remains their responsibility to promptly notify Yeske Buie if there is ever any change in their financial situation during the ongoing financial planning process, including any change to any investment objectives, risk tolerance, investment time horizon, and any investment policies, guidelines or reasonable restrictions. Non-discretionary accounts, individual securities and portfolio restrictions are not allowed without express Yeske Buie approval.

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### Business Retirement Plans

Yeske Buie will work with business Clients to develop, design and implement a retirement savings plan for their employees. Yeske Buie provides objective financial advice to plan sponsors and senior management regarding issues involving retirement plan options, wealth accumulation strategies for employees and participant education.

### Foundation & Endowment Fiduciary Services

Yeske Buie will provide fiduciary asset management services to Foundations and Endowments. Yeske Buie will work with Foundations and Endowments to identify goals that integrate the relationship between endowment policy and the investment policies.

### Foundation & Endowment Fiduciary Services - continued

Investment policies will be developed to incorporate appropriate asset allocation, including ascertaining risk tolerance, defining a time horizon, identifying appropriate asset classes and rebalancing guidelines, and assisting in defining the duties of all involved parties. **Prior to rendering advisory services, Yeske Buie will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective(s).**

## **C. Client Account Management**

When providing Asset Management Services, Yeske Buie will work with each Client to determine and understand their unique circumstances, including the following:

- Financial objectives
- Risk tolerance
- Time horizon
- Liquidity needs
- Tax situation

Yeske Buie will then develop a suitable written Investment Policy Statement that reflects these circumstances and guides us in designing a customized investment strategy for each Client. With these strategic guidelines in place Yeske Buie determines an appropriate asset allocation for the Client and constructs a portfolio utilizing the following:

- Exchange-Traded Funds (ETFs)
- Mutual Funds

All portfolios are rebalanced as necessary upon Yeske Buie review. More or less frequent rebalancing may be required depending on macroeconomic, market or sector factors.

## **D. Wrap Fee Programs**

Yeske Buie does not manage any proprietary wrap fee programs.

## E. Assets Under Management

As of December 31, 2011, Yeske Buie manages the following assets:

Discretionary Assets	\$335,201,802
Non-discretionary Assets	\$2,527,626
<b>Total</b>	<b>\$337,729,428</b>

## Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for asset management services. Each Client shall sign an Advisory Agreement that details the responsibilities of Yeske Buie and the Client.

### A. Fees for Advisory Services

Advisory Fees – Yeske Buie's charges a single fee for its services. Those engaging the firm for asset management services only, for any reason, pay the same fee. Typically, fees are a fixed percentage of the assets under management. Client fees will generally adhere to the following table.

<b>Advisory Services</b>	
<b>Assets</b>	<b>Annual Fee</b>
\$5,000,000 and less	1.00%
5,000,001 to \$10,000,000	0.50%
\$10,000,001 and over	0.35%

### B. Fee Billing

Asset-Based Fee – Fees are a fixed percentage of assets under management, based upon the account value on the last day of the quarter. Fees for asset management services vary depending on the amount of assets to be managed. Clients are invoiced quarterly in arrears for advisory services. For accounts opened during the quarter fees will be prorated to cover only that period during which the account was managed by Yeske Buie.

Asset-based management fees will be automatically deducted from the Client account by the Custodian. Yeske Buie shall send a quarterly invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account. The amount due is calculated by converting the annual rate in the table above to a quarterly rate and applying it to the total assets under management with Yeske Buie at the end of each quarter. Each billing will be for a single quarter, paid in arrears. Clients will receive independent statements from the Custodian no less frequently than quarterly. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

### C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third-parties, other than Yeske Buie, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the Custodian and executing broker-dealer. The Advisory Fees charged by Yeske Buie

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are separate and distinct from these Custodian and execution fees. In addition, all Advisory Fees paid to Yeske Buie are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in certain investments, without the services of Yeske Buie, but would not receive access to Advisor and Institutional share classes. The Client also would not receive the services provided by Yeske Buie, which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund(s) and the fees charged by Yeske Buie to fully understand the total fees to be paid.

#### **D. Advance Payment of Fees and Termination**

Yeske Buie is compensated for its services at the end of the quarter in which investment advisory services are rendered. Certain legacy Clients may have arrangements where fees are charged in advance. Clients may request to terminate their Investment Advisory Agreement with Yeske Buie, in whole or in part, by providing advance written notice to Yeske Buie. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Yeske Buie will refund any unearned, prepaid fees, if any. The Client's Advisory Agreement with Yeske Buie is non-transferable without Client's written approval.

Clients may terminate the Advisory Agreement without penalty (full refund or no fees due) within 5 business days of signing the Agreement if the Yeske Buie Form ADV Part 2 was not delivered at least 48 hours prior to Client's execution of the Agreement.

#### **E. Compensation for Sales of Securities**

Yeske Buie does not receive commissions or any compensation for transactions in any Client account. As a fee-only advisor, Yeske Buie is paid only on the advice and investment management provided to Clients based on the assets under management in the Client's account(s).

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

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Performance-based Fees – Yeske Buie does not charge performance-based fees for its advisory services. The fees charged by Yeske Buie are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Side-by-side Management – Yeske Buie does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options for its Clients.

## Item 7 – Types of Clients

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Yeske Buie may provide services to a variety of Client types. Clients may include the following:

- *Individuals, Personal Trusts and Estates* – Private investors, investing personal assets
- *Pension and Profit Sharing Plans* – Generally organized as a trust, investing the pooled assets of plan participants
- *Foundations & Endowments* – Non-profit organizations that manage a pool of assets, and distribute funds according to a mandate or mission
- *Charitable Organizations* – Non-profit organizations organized for a charitable purpose
- *Corporations* – Taxable entities organized for a specific business purpose, investing cash reserves

The relative percentage each Client type currently represents is available on Yeske Buie's Form ADV Part 1. The actual mix of types of Clients changes over time based upon market conditions, business plans and other factors. Yeske Buie does not specialize in, or actively seek, any given Client type. Yeske Buie is committed to providing services to qualified investors, regardless of legal or corporate status. Yeske Buie provides customized services to meet the unique needs of each Client. Additional details are contained in Item 4 – Advisory Services. Yeske Buie imposes a minimum account size of \$1,500,000. This minimum may be waived at the sole discretion of Yeske Buie.

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

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### A. Methods of Analysis

#### Macroeconomic Considerations

Yeske Buie's approach to developing and managing investment portfolios is predicated upon certain fundamental assumptions with regard to the factors that most influence investment success; among these factors are asset allocation, value criteria, size criteria, fees and expenses. Yeske Buie designs its target portfolios to harness these factors and implements its strategy using Exchange Traded Funds and Mutual Funds.

#### Investment Manager Due Diligence

Where Yeske Buie invests its Clients' assets with independent managers, it selects managers who pursue investment approaches that are focused and are diversified among multiple asset classes, regions, industry sectors and securities. In selecting an independent manager and allocating assets to them, Yeske Buie considers both quantitative and qualitative factors including:

- The clarity of, and adherence to, viable investment policies
- Relative performance during various time periods and market cycles
- Industry reputation
- Experience and training of staff investment professionals
- Risk management process
- Portfolio management capabilities
- Fee structure
- Any other factor deemed appropriate by Yeske Buie

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## **A. Methods of Analysis - continued**

Yeske Buie may use various databases of information in order to facilitate the discovery process on each investment manager utilized by Yeske Buie.

## **B. Investment Strategies**

Yeske Buie structures portfolios using the methodology described above. Yeske Buie believes that Clients will benefit from having a portfolio of holdings invested in a variety of asset classes. To the extent that these asset classes are non-correlated, the portfolio will experience investment returns with mitigated risk.

### Asset Allocation

Yeske Buie structures strategically designed portfolios using the principles of Modern Portfolio Theory ("MPT"). MPT is an investment methodology that suggests that investors may benefit from having a portfolio of holdings invested in a variety of asset classes. To the extent that these asset classes are non-correlated, the portfolio will experience investment returns with mitigated risk. Yeske Buie constructs Client investment portfolios based upon the premise that asset allocation models can be developed using historical performance data and academically tested assumptions about the future. This information can be used to optimize the risk-adjusted expected rate of return of a given portfolio. Yeske Buie offers a selection of modeled portfolios that offer a range of equity and fixed income exposure levels.

Yeske Buie will not pursue strategies that are highly speculative in nature.

## **C. Risk of Loss**

General Investment Risks – Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Yeske Buie will assist Clients in determining an appropriate strategy based on their tolerance and capacity for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will generally entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

Yeske Buie generally employs investment strategies that do not involve any significant or unusual risk other than domestic and international market risks.

Other Risks - Please remember that different types of investments involve varying degrees of risk, including the possible loss of principal and that past performance may not be indicative of future results. Therefore, it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies undertaken by Yeske Buie) will be profitable.

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## Item 9 – Disciplinary Information

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Yeske Buie and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with which you partner.

Background information is available on the Investment Advisor Public Disclosure website at

<http://advisorinfo.sec.gov>.

To review the firm information for Yeske Buie, click **Investment Advisor Search** in the left navigation menu, select the option for Investment Advisor Firm and enter **143234** (*our firm's CRD number*) in the field labeled "Firm IARD/CRD Number:" This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. **There are no legal, regulatory or disciplinary events involving Yeske Buie or any of its employees.**

## Item 10 – Other Financial Activities and Affiliations

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Yeske Buie does not have any affiliations with other financial service firms. All relationships are for contracted services only, and no affiliation is created by way of these various service agreements.

## Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

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### A. Code of Ethics

Yeske Buie has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Yeske Buie. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Yeske Buie and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Yeske Buie associates to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. Yeske Buie has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (703) 538-2116.

### B. Personal Trading and Conflicts of Interest

Yeske Buie allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities that may also be recommended to you. **At no time will Yeske Buie or any associated person of Yeske Buie transact in any security to the detriment of any Client.**

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Yeske Buie is a Fee-Only advisor, who, in all circumstances, is compensated solely by the Client, with neither the advisor nor any related party receiving compensation that is contingent on the purchase or sale of any financial product. Yeske Buie does not engage in any transactions where it has a financial interest, including, but not limited to, commissionable securities transactions, buying securities from or selling securities to its Clients.

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

Yeske Buie does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Yeske Buie to direct trades to this Custodian. Further, Yeske Buie does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Yeske Buie does not exercise discretion over the selection of the Custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by Yeske Buie. Yeske Buie may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the Custodian's offices. Yeske Buie does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Yeske Buie typically recommends to Clients that they established their brokerage account[s] at the Institutional Services division of Charles Schwab & Co., Inc. ("Schwab"). Schwab is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. Schwab offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Yeske Buie receives some benefits from Schwab through its participation in the program as noted in Item 14 below. Yeske Buie considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided. Yeske Buie is not affiliated with, or related to, Schwab.

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services.

**Yeske Buie does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

**2. Brokerage Referrals** - Yeske Buie does not receive any compensation from Schwab or any other entity in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Yeske Buie will place trades within the established account[s] at the Custodian designated by the Client. Further all Client accounts are traded within their respective brokerage account[s]. Yeske Buie will not engage in any principal transactions (i.e., trade of any security from or to Yeske Buie's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Yeske Buie will not be obligated to select competitive

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bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Yeske Buie will execute its transactions through an unaffiliated broker-dealer selected by the Client. Yeske Buie may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

#### Asset Management Clients

Accounts are monitored on an ongoing basis by Yeske Buie for adherence to investment policies. Asset management and supervision over the securities contained in the Client's portfolio are performed on an ongoing basis by Yeske Buie, as applicable to each Client situation.

#### Financial Planning Clients

Financial planning is a process that reviews and revisits the Client's situation on an ongoing basis. Reviews may be more or less frequent depending on each Client's situation and financial circumstances.

### **B. Causes for Reviews**

Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Yeske Buie if changes occur in his/her personal financial situation that might affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

#### Investment Portfolio Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. Typically, statements are sent monthly. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity.

Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. Additionally, Yeske Buie will provide reports, generally monthly, that will summarize activity, performance and holdings.

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### Financial Planning Reports

Financial planning is a process and, as such, the timing and frequency of reviews and reports will vary by Client.

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

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### **A. Compensation Received by Yeske Buie**

Yeske Buie is a Fee-Only advisor, who, in all circumstances, is compensated solely by the Client. Yeske Buie does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party. Yeske Buie may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Yeske Buie may receive referrals of new Clients from a third-party. In either case, no compensation is given or received. All referrals are a professional courtesy and in the interest of the Client.

### **B. Client Referrals from Solicitors**

Yeske Buie does not presently pay any solicitors to refer business to Yeske Buie. Yeske Buie may refer Clients to various third-parties to provide certain services necessary to meet financial goals. Likewise, Yeske Buie may receive a Client referral from a third-party. In either case, no compensation is given or received. All referrals are a professional courtesy and in the interest of the Client.

### **C. Other Compensation**

As noted in Item 12 above, Yeske Buie participates in the Schwab Institutional Advisor program and receives economic benefits from this relationship. Yeske Buie receives discounts on systems and other services that are generally not available to retail investors. These services are designed to assist Yeske Buie in servicing its Clients. Although there is no direct compensation from Schwab, these services do have a potential conflict of interest whereby Yeske Buie will generally recommend Schwab.

## **Item 15 – Custody**

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Yeske Buie does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Yeske Buie to utilize that custodian for the Client's security transactions. For more information on custodians and brokerage practices, see Item 12 - Brokerage Practices.

While Yeske Buie does not have custody of Client funds or securities, payments of fees may be paid by the Custodian from the custodial brokerage account that holds Client assets. In certain jurisdictions this may be deemed constructive custody. Prior to permitting direct debit of fees each Client provides written authorization permitting fees be paid direct from the Custodian. Yeske Buie will invoice the Custodian for the amount of the fees to be deducted from the Client's account[s]. The Custodian will send to the Client an account statement not less than quarterly showing all account activity, including the amounts disbursed from the account to Yeske Buie.

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Vienna, VA 22180



220 Montgomery St., Suite 900  
San Francisco, CA 94104

Phone: (703) 538-2116 ♦ Fax: (703) 242-1237 ♦ [www.YeBu.com](http://www.YeBu.com)

## Item 16 – Investment Discretion

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Yeske Buie generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment policies, guidelines, or limitations previously set forth by the Client and agreed to by Yeske Buie. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Advisory Agreement or equivalent authorization document. All discretionary trades made by Yeske Buie will be in accordance with each Client's investment policies.

## Item 17 – Voting Client Securities

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Yeske Buie does not accept proxy voting responsibility for any Client. Therefore, although Yeske Buie may provide asset management services relative to Client investment assets, Yeske Buie Clients maintain 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 type events pertaining to the Client's investment assets. Yeske Buie and/or the Client shall correspondingly instruct the Custodian of the assets to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets.

## Item 18 – Financial Information

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Neither Yeske Buie, nor its management has any adverse financial situations that would reasonably impair the ability of Yeske Buie to meet all obligations to its Clients. Yeske Buie has not been subject to a bankruptcy or financial compromise. Yeske Buie is not required to deliver a balance sheet along with this brochure as the firm does not collect advance fees for services to be performed six months or more in advance. Yeske Buie generally charges fees in arrears. Please see Item 5 - Fees and Compensation for additional information.

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