



**LONG-TERM  
SOLUTIONS**

Family Office & Wealth Management

**Item 1      COVER PAGE**

**Long-Term Solutions, LLC**

SEC File Number: 801 – 56865

**Part 2A Brochure**

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This brochure provides information about the qualifications and business practices of Long-Term Solutions, LLC (“LTS”). If you have any questions about the contents of this brochure, please contact us at (415) 321-2950 or Naomi Ramsden, Chief Compliance Officer at [nramsdn@longtermsolutions.org](mailto:nramsdn@longtermsolutions.org). 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. SEC registration does not imply that it has reviewed the skills or training of the Advisor. Additional information about Long-Term Solutions, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 MATERIAL CHANGES**

There have been no material changes since Long-Term Solutions, LLC filed its prior Form ADV, Part 2A on March 27, 2012 and as amended on July 31, 2012.

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#### **Item 4      ADVISORY BUSINESS**

A.      Long-Term Solutions, LLC (“LTS” or “Firm”) is a limited liability company formed in 2005 in the state of Delaware and registered as an SEC Investment Adviser in April, 2006. LTS is a two member LLC owned by the Richard & Roberta Intrater Revocable Trust dated December 28, 2007 and Brandon Intrater.

B.      LTS is engaged in the business of providing family office, wealth management and financial planning services to multiple generations of ultra high net worth families and other individuals of significant wealth. In addition, LTS is the general partner/manager of LTS Capital Partners I, LP and LTS Capital Partners II, LLC, both of which are private limited partnerships/limited liability company investments and are discussed further in Item 10 C below. LTS’ clients may choose one service without any obligation to engage LTS for any other.

#### **Wealth Management Services**

LTS’ investment advisory client accounts are generally managed on a fully discretionary basis. This means that the client grants LTS the discretion and authority to supervise, invest and trade client assets placed under its management in a manner consistent with established client objectives and guidelines. LTS’ services are fully described in the written Wealth and Investment Services Agreement which is signed by the client. This Agreement sets forth the terms and conditions under which LTS shall manage the client's assets.

LTS generally recommends that its clients allocate their investment assets among various mutual funds, exchange traded funds, separate accounts, and alternative investments as may be appropriate. Generally, LTS does not recommend individual stocks or bonds. Prior to rendering investment advisory services, LTS ascertains, in consultation with the client, the client’s financial situation, risk tolerance, and investment objective(s) as well as other pertinent information in order to make informed investment decisions.

As part of its investment advisory services, LTS makes available to clients certain investment benefits that may not otherwise be available to a retail investor. Such benefits include:

- Access to institutional share classes (i.e. lower cost share classes) of certain fund families;
- Access to certain investment products whose substantial minimums would normally preclude retail client investment;
- Access to sophisticated investment research not available to the public.

The written LTS Wealth and Investment Services Agreement provides that the client may select some or all of the various services offered by LTS. These services include:

### **Investment Strategy & Implementation**

LTS will meet with the client and engage in a detailed discussion to determine the client's goals, objectives and risk orientation. There will be a careful review and examination of the client's existing assets followed by a recommended, customized strategic asset allocation. Depending on the client's circumstances, LTS may recommend Separate Account Managers, Alternative Investments, and stock hedging strategies. LTS may oversee assets for a client that are managed independently from LTS' management. If the client chooses to have these assets under LTS' oversight, and taken into account with respect to asset allocation decisions, they will be included in LTS' wealth management fee calculations. As needed, LTS will also provide its clients with other financial related services, including: financial modeling to determine if/how the client's goals can be met; liquidity and cash flow management; tax strategies; and global strategy reviews.

### **Private Investment Funds**

LTS may provide investment advice regarding private investments. These private investments may be ones that LTS recommends and/or ones that the client already owns and/or wishes to consider owning. The client may choose whether or not to place such funds under supervision with LTS. Should they choose to do so, LTS' role relative to these private investment funds is limited to its initial due diligence review as well as ongoing investment monitoring services. If the client invests in any private investment fund other than the LTS Capital Partners funds discussed below in Item 10, LTS will not receive any referral fee, commission or other compensation for any such purchase. Private investment funds placed under LTS' supervision will be included in the client's Assets Under Management ("AUM") for purposes of calculating LTS' investment management fee. If the client's private investment funds are not subject to LTS' supervision, no advisory fee will be charged. As discussed below in Item 10 C, for those LTS clients who invest in LTS' proprietary private equity, the value of this investment is not included in calculating its advisory fee for that client. LTS' clients are under no obligation to consider or make an investment in LTS' proprietary private equity.

### **Family Office Services**

Clients may retain LTS to render certain Family Office Services on an ongoing basis. Such services could include, among others, transition advising, integrated financial services such as personal budgeting, cash flow forecasting, coordination of advisors, risk assessment and management, wealth transfer planning, entity and hard oversight, family continuity/education, family philanthropy, trusteeship services, client information management, general ledger accounting, preparation of financial statements, bill paying, and foundation oversight.

### **Third Party Professionals**

To the extent requested by a client, LTS may recommend the services of other professionals for certain non-investment purposes (e.g., attorneys, accountants, insurance agents, etc.). The client is under no obligation to engage the services of any such recommended professional. LTS receives no fee or other benefit for these

referrals. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

#### No Tax or Legal Advice

Neither LTS, nor any of its employees, serves LTS' clients as an accountant, attorney or licensed insurance agent, and no portion of LTS' services should be considered as such.

#### **Client Obligations and Responsibilities**

- A. LTS offers its clients a selection of services. Family Office Services are only available to Wealth Management Clients.
- B. LTS shall not be required to verify any information received from the client or from the client's other professionals, and the Wealth and Investment Services Agreement expressly authorizes LTS to rely on information provided.
- C. It remains the client's responsibility to promptly notify LTS if there is any material change in his/her/its financial situation or investment objectives.

#### **Disclosure Statement**

A copy of this written brochure, known as Part 2A of form ADV shall be provided to each new client prior to, or contemporaneously with, the execution of the Wealth and Investment Services Agreement. At the same time, new clients will receive a copy of the supplemental brochure known as Part 2B. Part 2B of form ADV describes the background and experience of each LTS employee who serves on its Investment Committee and/or provides the client with direct Investment Advice.

#### **Other Information**

- A. LTS' clients may impose reasonable restrictions regarding their investments.
- B. LTS does not participate in a wrap fee program.
- C. As of December 31, 2012, LTS' dollar amount of client assets managed was as follows:
  - discretionary client assets in the amount of \$124,712,270;
  - non-discretionary client assets in the amount of \$10,445,813.
- D. As of December 31, 2012, LTS's dollar amount of client assets under supervision which are not included in the numbers above was \$81,664,935.

## **Item 5        FEES AND COMPENSATION**

The fees charged by LTS for its Wealth Management Services are set forth in LTS' written Wealth and Investment Services Agreement which is signed by its clients. LTS does not have a set minimum asset requirement for its clients but its services are designed to best serve ultra high net worth individuals. LTS believes its fees are competitive with those charged by other advisors for comparable services. LTS, in its sole discretion, may reduce its fees, and/or waive or reduce its minimum asset requirements, depending on the individual client's circumstances.

A client may choose to have fees deducted from the investment account in accordance with SEC accepted procedures. Alternatively, a client may choose to pay for these services directly.

The Wealth and Investment Services Agreement between LTS and the client will continue in effect for two (2) years and is thereafter renewed automatically unless written notice is given by either party to terminate within ninety (90) days prior to the date of termination. However, after one hundred and eighty (180) days from the effective date of the Agreement, either party may terminate with or without cause by written notice to the other, effective thirty (30) days after receipt of such notice. Any fees paid in advance exceeding any termination notice period for services yet to be rendered, will be remitted to client on a pro-rata basis within five (5) weeks of the termination notice.

### **Wealth Management Fees**

Those clients for whom LTS provides portfolio management services are charged wealth management fees. In general, this fee is an annual percentage of the value of the AUM and covers a range up to 100 basis points. In rare instances, a client may be charged a minimum fee. Wealth Management Fees may also be tiered so that at specified AUM breakpoints, the basis points charged decrease. These fees are based upon the then current market value of all marketable securities as of the last day of the applicable calendar quarter and are generally deducted from the client's accounts in advance in accordance with procedures acceptable to the SEC. As stated above, fees for illiquid assets are based upon the most recent available valuation from the investment manager. The initial quarterly fee for a new client is pro-rated from the effective contract date. For some clients, should subsequent contributions and withdrawals of assets exceed a certain amount LTS are will also pro rate its fees from the date of such contribution/withdrawal.

The LTS Wealth and Investment Services Agreement provides that each quarter, in advance, LTS will deduct its Wealth Management Fees directly from the client's account. LTS' clients receive monthly account statements directly from their qualified custodian. LTS also sends its client's quarterly performance reports that it has prepared and which urge the client to compare the LTS report with the client's custodial statement. LTS' reports also notify clients that it is their responsibility to verify the accuracy of LTS' fee as the custodian does not perform this function. LTS

performs periodic testing to ensure that its fees are charged in accordance with the client's Agreement.

### **Family Office Services Fees**

LTS offers family office services that are necessarily unique for each client. LTS charges an annual retainer based upon the complexities of the client's current financial condition, number of accounts, the multi-generational structures to be managed and the breadth of family office services required. The Family Office Services Fees generally range from between \$25,000 and \$500,000 per annum. The annual retainer fee is billed quarterly, in advance and, depending on the Client's preference, could be automatically deducted from a client account or invoiced to the client directly.

### **Custodial Fees**

In general, LTS' Wealth Management Services to its clients are implemented at Schwab Institutional at Charles Schwab & Co., Inc. ("Schwab"). As a condition of having LTS provide Wealth management Services via the Schwab platform, clients will enter into the appropriate written account agreements with Schwab. Schwab charges transaction fees but does not charge LTS' clients custodial fees. LTS meets regularly with Schwab to negotiate the lowest possible transaction fees for its clients. The transaction fees charged by Schwab are in addition to LTS' Wealth Management Fee and may be higher or lower than those charged by other custodians. If for some reason a client utilizes a custodian other than Schwab, the other custodians' fees may differ and are in addition to and separate from the Wealth Management Fee charged by LTS. LTS receives no fee or commission for recommending any custodian.

### **Separate Account Manager Fees**

LTS may recommend to its clients that they invest using a Separate Account Manager. If the client does so, the client will enter into an account agreement with the Separate Account Manager and such agreement will set forth the Separate Account manager's fees. These fees are separate from and in addition to LTS' Wealth Management Fee. LTS receives no fee or commission for recommending any Separate Account Manager.

### **Mutual Fund Fees**

Mutual Fund Managers incur operating expenses and pass some or all of these expenses through to their individual investors in the form of management fees. These may vary from fund to fund. LTS generally provides its clients with access to institutional products with low relative fees.

The Mutual Fund Manager will provide each client a prospectus for each fund in which they invest. (The prospectus is not provided through LTS.). This prospectus will provide a complete disclosure of a fund's management and fee structure. All such Mutual fund Fees are in addition to and separate from the Wealth Management Fee charged by LTS. LTS receives no fee or commissions for recommending any custodian.

## **Item 6      PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

LTS does not generally engage in side-by-side management. LTS does receive performance based fees in conjunction with its proprietary LTS Capital Partners, once the partners invested capital has been returned in full. Please see Item 10 below, Private Equity for additional details.

## **Item 7      TYPES OF CLIENTS**

As stated above, LTS' clients include ultra high net worth individuals, multiple generations of ultra high net worth families, and private foundations. LTS generally does not require a minimum asset level for its Wealth Management Services, but it best suited to serve ultra high net worth individuals.

## **Item 8      METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

LTS employs a disciplined approach to investing and portfolio construction which takes into account, among other things, the client's goals and objectives, time horizon, and risk tolerance. The ensuing portfolio aims to be broadly diversified across asset classes, sectors, and geographies, so as to have an acceptable probability of achieving the risk adjusted returns suitable to the client's stated objectives. LTS uses a variety of vehicles including mutual funds, ETFs, separate accounts, and limited partnerships. Clients are given access to a fund's institutional share class, when available. To improve the probability of meeting its client's goals, LTS may develop shorter-term tactical investment views which are typically structured around a long-term strategic allocation. Using broad-market and asset class analysis, LTS may overweight or underweight certain asset classes based upon relative attractiveness for the short-to-medium term. LTS will monitor the portfolio and adjust these weights as market circumstances warrant. In evaluating fund managers, LTS, has periodic communications with the managers to assess various quantitative and qualitative factors. LTS may rebalance the portfolio as the percentages of the various asset classes fluctuate significantly from their stated targets if market conditions warrant. Where appropriate, LTS will also sell certain investments in order to take advantage of tax-losses that may have occurred in a client's portfolio.

LTS employs sophisticated outside investment research consultants at its own expense, as appropriate, to provide an additional layer of expertise and rigor in selecting and monitoring managers. The purpose of such outside investment counsel is to assist and augment LTS' own research and analysis, which will assist LTS in its manager selection and evaluation process.



While many clients portfolios are customized to meet their particular circumstances, LTS develops a range of 'model' strategic portfolio's that progress from 'preservation' to 'aggressive' strategies which serve as a starting point for the creation of individual portfolios. Each model strategy is based on historical and projected capital market assumptions, mean-variance relationships, correlation data, probability analysis and optimized into distinct portfolio's with various asset class weightings based on risk/return trade-offs. The results provide 'expected' (but not guaranteed) returns over a complete market and economic cycle for different levels of risk (defined by standard deviation). Actual returns vary significantly from these theoretical models because of market conditions, customization, client imposed constraints and tactical management. When determining complex, long-term financial planning needs, LTS also sometimes uses standard financial planning tools to run hypothetical simulations and assess probability of meeting desired long-term outcomes.

**Please Note: Risk.** All investments carry risk, which varies according to investment type. Investment products or investment strategies are not guaranteed to adhere to any predefined level of performance. Significant losses of capital are possible. Although diversification may minimize this risk, diversification itself does not prevent losses from occurring, nor does it guarantee profitable results. The managers of the funds selected for the portfolio and their associated strategies present additional risk which varies within and across market sectors and asset classes. LTS aims to minimize this additional risk by picking managers with long track records of consistent performance, sound investment philosophy and strong management teams, as well as diversifying across managers within each asset class.

## **Item 9        DISCIPLINARY INFORMATION**

LTS has not been the subject of any disciplinary actions.

## **Item 10       OTHER FINANCIAL ACTIVITIES AND AFFILIATIONS**

A.       Neither LTS nor its employees are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

B.       Neither LTS nor its employees are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

### **Private Equity**

LTS is the general partner or managing member of LTS Capital Partners I, LP and LTS Capital Partners, II, LLC, hereinafter together referred to as "the Partnerships." These Partnerships make venture and private equity investments in specified privately held companies on behalf of "qualified investors" as that term is defined

under Rule 205—3 of the Investment Advisers Act of 1940. LTS provides administrative, advisory and management services to these Partnerships

These Partnership investments may be available to its clients, employees, and select outside investors. Risks including conflicts of interest are described in the written private placement memorandums and subscription agreements. There is no obligation for any client to purchase any interest in LTS' Private Equity. However, some but not all of LTS' clients have made an investment and are limited partners and/or members of these private equity offerings.

### **Private Equity Management Fees**

In its capacity as Company Manager or General Partner, LTS charges each of the private equity entities a management fee equal to a percentage of the total Capital Contributions committed; generally up to 1%. This Management Fee is billed annually in advance to each investor of the series of LTS Capital Partners II, LLC. For LTS Capital Partners I, LP, the Management Fee is accrued annually and payments of the Management Fee will be paid from future distributions by the partnership. For LTS Capital Partners II, the Management Fees and expenses will be billed annually. For those advisory clients who have invested in LTS' private equity, LTS does not include the value of these investments when calculating its Wealth Management Fee.

### **Private Equity Costs and Expenses**

Under the terms of the Partnership/Operating Agreements, the Partnership receives reimbursement for certain expenses of LTS incurred such as legal, accounting, filing, tax and other expenses. These reimbursable expenses are spelled out in the Offering Documents

### **Private Equity Carried Interest**

LTS is entitled to receive, from each private equity offering, a participating distribution equal to 20% of the remaining proceeds and/or net income, attributable to any portfolio investment, AFTER payment of accrued management fees and expense reimbursements and 100% return of capital to the limited partners/members.

### **Valuation**

It is very difficult to value Private Equity. For this reason, LTS has made a policy decision to value private investments on the basis of contributed capital. It is possible that such value could be significantly more or less than the original purchase price.

### **Conflict of Interest**

As discussed above, LTS will receive management fees, expense reimbursement and a participating distribution from its proprietary Private Equity investments. LTS is aware of its fiduciary responsibility to its clients and makes certain that all Private Equity investor clients are advised and informed of the risks inherent in such an investment.

**Item 11      CODE OF ETHICS, PARTICIPATION OR INTEREST IN  
CLIENT TRANSACTIONS AND PERSONAL TRADING**

Please see the response to Item 10 with respect to LTS' participation and interest in its Private Equity offerings.

LTS has adopted a Code of Ethics, which serves to establish a standard of professional and personal conduct for all LTS employees that is based upon fundamental principles of openness, integrity, honesty and trust. A copy of LTS' Code of Ethics is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, LTS also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by LTS or its employees.

As a part of its Code of Ethics, LTS has implemented a Personal Securities Transaction Policy to review and monitor the personal securities transactions and securities holdings of LTS' employees. Each quarter, all LTS employees must submit a record of their personal securities transactions to the Chief Compliance Officer for her review. In addition, LTS' Securities Transaction Policy requires that all employees provide the Chief Compliance Officer with a written report of their current securities holdings within ten (10) days after becoming an employee. Additionally, all employees must provide the Chief Compliance Officer with a written report of their current securities holdings at least once each twelve (12) month period.

LTS has developed a formal privacy policy to protect its Client's personal confidential information. This policy is available upon request.

A copy of LTS' code of ethics and policies related to employee personal trading are made available to any requesting client or prospective client.

A Limited Partner in one of LTS Capital Partners Series investments is also a salesman for one of the mutual funds used by LTS. LTS had been using this fund for its clients before this investment was made and continues to use this fund, as is appropriate. LTS has a rigorous and continuous fund evaluation process and the funds continued use is completely independent of the salesman's personal investment. In order to address any appearance of conflict of interest (LTS does not receive 12b-1 fees), in the future the CCO will receive formal and written documentation of any LTS future transactions with this fund.

## **Item 12      BROKERAGE PRACTICES**

### **Relationship with Schwab**

While LTS maintains numerous custodial relationships, the preponderance of client assets are custodied at Schwab. The client is required to enter into a separate custodial/clearing agreement with the custodian of their choice. The client will pay the custodian certain fees, and these fees are in addition to the fees the client will pay to LTS.

Factors that LTS considers in recommending Schwab include historical relationship with LTS, financial strength, reputation, execution capabilities, pricing, and service.

### **Trading Practices**

Internal trading (as opposed to trading done in client's separate accounts) is done at the client's chosen custodian. Trading is generally executed through online trading platforms with the relevant custodian.

### **Best Execution**

All fees paid by LTS' clients shall comply with LTS' duty to obtain best execution. However, on rare occasion, a client may pay fees that are higher than another qualified custodian might charge to effect the same transaction. In seeking best execution, the determinative factor for LTS is not the lowest possible transaction cost, but whether the transaction represents the best overall qualitative execution, taking into consideration the full range of custodial services, including execution capability, market impact cost, commission rates, financial strength and responsiveness. In other words, is the fee reasonable in relation to the value of the services received? Accordingly, although LTS will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions.

LTS does not receive any consulting services from Schwab or discounts on any products or services provided by Schwab.

LTS' clients do not pay more for investment transactions effected and/or assets maintained at Schwab. There is no corresponding commitment made by LTS to Schwab or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products.

### **Soft Dollars and Payment of Referral Fees**

LTS does not accept any soft dollar arrangements, nor compensate any broker/dealer/custodian for client referrals.

### **Directed Brokerage**

LTS does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer/custodian). In the instance when a client chooses to maintain a relationship with another custodian, the client will negotiate terms and arrangements for their account with that custodian, and LTS will not seek better execution services or prices from other broker-dealers/custodians. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

However, LTS will oversee any such outside relationships and may make recommendations to the client. These outside accounts may or may not be included in the calculation of LTS' Wealth Management Fee depending on the level of LTS' required oversight.

### **Item 13      REVIEW OF ACCOUNTS**

A.      For those clients to whom LTS provides investment supervisory services, LTS provides a quarterly report. The report includes current holdings as of the report date (end of the calendar quarter), historical performance of the client portfolio versus applicable benchmarks and a custom blended benchmark, the management fee invoice, and a disclosure page. In addition, the year end quarterly reports also include realized gain-loss, income, and expense reports for each account as applicable.

B.      All clients (in person or via telephone) are encouraged to review with LTS financial planning issues (to the extent applicable), investment objectives and account performance together with any personal or financial changes at least on an annual basis. Most clients are in touch with LTS on a much more frequent basis. LTS may also conduct account reviews upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections, mutual fund management changes and client requests.

C.      Clients are also provided monthly or quarterly statements directly from their custodian that summarizes the beginning and ending values of the assets as well as all transaction activity during the month. In addition to the custodial statements, clients get trade confirmations from the custodian whenever trades are executed in their accounts.

### **Item 14      CLIENT REFERRALS AND OTHER COMPENSATION**

LTS does not have any solicitor arrangements.

## **Item 15      CUSTODY**

On occasion, LTS may agree to pay bills for certain of its clients and/or act as a Trustee for a client. LTS Capital Partners I and II utilize pooled investment vehicles for investors in its Private Equity. For each such account, LTS is deemed by the SEC to have “custody” of its client’s assets and will submit each such account for a required annual surprise audit.

## **Item 16      INVESTMENT DISCRETION**

### **Discretionary and Non-Discretionary Management**

As discussed above in Item 4, LTS’ clients may choose to engage LTS for Wealth Management Services on a discretionary or non-discretionary basis. In either case, the client will sign a Wealth and Investment Services Agreement which specifies which kind of service that LTS will render.

### **Discretionary**

Generally, LTS client accounts are managed on a fully discretionary basis wherein the client grants LTS the discretion and authority to supervise, invest and trade client assets placed under its management in a manner consistent with established client objectives and guidelines. Prior to LTS assuming discretionary authority over a client’s account, the client shall be required to execute a Wealth and Investment Services Agreement, naming LTS as the client’s attorney and agent in fact, granting LTS full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client’s name found in the discretionary account. When engaged on a discretionary basis, LTS may change the basic client approved equity/fixed income ratio, the sub asset allocations and the investment funds in the client’s account without client approval.

### **Non-discretionary**

A client may choose to have a non-discretionary relationship with LTS. With respect such non-discretionary Wealth Management Services, LTS generally maintains ongoing responsibility to make recommendations, based upon the needs of the client. If such recommendations are accepted by the client, LTS is responsible for arranging or effecting the purchase or sale. Under a non-discretionary arrangement, the client has the sole authority with regard to the, acceptance, or rejection of any recommendation or advice from LTS. For non-discretionary clients, LTS may not make any changes in the client’s assets under management without prior approval from the client.

## **Item 17      VOTING CLIENT SECURITIES**

A. As stated in its Wealth and Investment Services Agreement, LTS does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities 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.

B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact LTS to discuss any questions they may have with a particular solicitation.

## **Item 18 FINANCIAL INFORMATION**

A. LTS is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

B. LTS has not been the subject of a bankruptcy petition.

ANY QUESTIONS: LTS' Chief Compliance Officer, Naomi Ramsden Esq., remains available to address any questions that a client or prospective client may have regarding the above disclosures, conflicts of interest and other arrangements.