



# LOGe Solutions, LLC

## Investment Advisor Information

---

### **Form ADV Part IIA**

This Part 2A of the Form ADV gives information about the investment advisor and its business for the use of clients. This information has not been approved or verified by any government authority. A companion document, Part 2B of the Form ADV, provides supplemental information on advisory personnel and is available upon request.

Annual Update as of December 31<sup>st</sup>, 2012 amended as of September 23, 2013  
Filed September 27, 2013

### **CONTACT**

Justin Schleifer, CCO  
LOGe Solutions, LLC  
60 State Street Suite 700  
Boston, MA 02109  
E-mail: [info@log-e.com](mailto:info@log-e.com)  
Phone: (415) 645-6503

## CONTENTS

1. Cover Page .....	3
2. Material Changes .....	3
3. Table Of Contents .....	4
4. Advisory Business.....	4
5. Fees & Compensation .....	4
5.1. Fees Payable .....	6
5.2. Termination of Relationship .....	6
5.3. Minimum Account Value & Alternative Fees .....	6
5.4. General Fee Disclosures .....	7
6. Performance-Based Fees & Side-by-Side Managements.....	7
7. Types of Clients .....	7
8. Methods of Analysis, Investment Strategies, & Risk of Loss.....	8
9. Disciplinary Information .....	9
10. Other Financial Industry Activities & Affiliations .....	9
11. Code of Ethics .....	10
12. Brokerage Practices .....	11
12.1. Best Execution.....	11
12.2. Trade Allocation & Aggregation.....	12
12.3. Client Directed Brokerage.....	12
12.4. Soft Dollar Arrangements .....	13
13. Review of Accounts.....	13
13.1. Reviews & Reviewers .....	13
13.2. Nature & Frequency of Reporting to Clients.....	14
14. Client Referrals & Other Compensation .....	14
15. Custody .....	14
16. Investment Discretion.....	14
17. Voting Client Securities.....	15
18. Financial Information.....	15

## 1. COVER PAGE

LOGe Solutions, LLC (LOGe) is an independent, privately owned investment advisory firm that provides investment advice to its clients. We are located at 60 State Street, Suite 700, Boston MA 02109. We can be reached at Phone: (800) 928-4690, FAX: (800) 928-7624, email: [info@log-e.com](mailto:info@log-e.com), and web: <http://www.log-e.com>.

LOGe offers its risk management investment solutions to individuals, trusts, foundations, businesses and institutional investors on both a direct basis, and through subadvisory relationships with other investment advisors. Our core Risk Rebalanced® Strategy aims to reduce volatility, minimize exposure to major draw downs, and generate an asset-based income stream. Our investment approach can help resolve some of the cognitive biases in an investor's assessment of risk and return, and provides new tools for total portfolio management across multiple asset classes, including systematic rebalancing and tax-loss harvesting.

LOGe works with clients several ways:

- we offer our Risk Rebalanced® Strategy in seven asset classes to allow clients to articulate their own discrete exposures
- we offer four diversified Risk Rebalanced® Portfolios which serve as complete portfolios for a targeted risk objective
- we offer Advisor Directed Allocations to other RIAs in which they construct one or more models by combining our Risk Rebalanced Strategies® with other securities, and we perform all trade execution including tax-loss harvesting and rebalancing to model
- we construct custom solutions for clients looking to manage or unwind a concentrated-stock portfolio, provide risk management overlays to an existing active manager, or achieve a unique risk/return profile relative to a reference asset

LOGe's solutions are offered through separate accounts to provide clients with transparency, asset security, daily liquidity, and a compelling fee structure.

The date of publication for this brochure is September 23, 2013. This brochure has not been approved by the Securities and Exchange Commission (SEC) or any state securities authority. LOGe is registered as an investment advisor with the SEC. However, registration does not imply a certain level of skill or training.

## 2. MATERIAL CHANGES

The Dodd-Frank Wall Street Reform and Consumer Protection Act, signed into law by President Obama on July 21st, 2010, requires registered investment advisors (RIAs) to disclose any material changes to their brochure. There have been material changes to LOGe's policies, practices or conflicts of interests

since its last filing in March 2013. This brochure has been materially changed Since January 13, 2012 as follows:

- Section 4: Assets Under Management value has changed
- Section 5: Fee Schedule has been updated to include Advisor Directed Allocation and subadvised fee schedules
- Section 8: Methods of Analysis, Investment Strategies, and Risk of Loss information was updated
- Section 10: Discloses terms of Jeffrey Wycoff's and Ralph Drybrough's acquisition of Neville McCaghren's ownership interests in LOGe

### **3. TABLE OF CONTENTS**

The table of contents is available at the beginning of this brochure. The SEC would like all investment advisor Form ADV Part II filings to have similar structure so that clients and prospective clients can more easily compare data items from one advisor to the next. We have delivered our information in a manner consistent with the SEC's suggested format. However, where possible and permissible, we have tried to eliminate redundancy.

### **4. ADVISORY BUSINESS**

LOGe is an independent, privately owned investment advisory firm that provides investment advice to individuals, trusts, foundations, businesses, and institutions.

As part of its management business, LOGe provides investment advice to its clients under a discretionary arrangement in which clients grant LOGe 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. LOGe manages these client assets on both a direct contractual basis with the client, and through subadvisory relationships with other investment advisors who grant LOGe discretion and provide instructions on behalf of their end-clients. In certain instances, typically at the request of professional investors or institutional clients, LOGe may agree to advise assets held in an account over which the firm has no discretionary authority.

As of December 31<sup>st</sup>, 2012, LOGe had under management \$146,349,030 in discretionary assets across 172 accounts.

### **5. FEES & COMPENSATION**

LOGe offers investment advisory services with the following fee structures depending on the client relationship:

- 1) Typically a percentage of assets under management (AUM, see schedules below)
  - 2) Occasionally, an hourly charge (negotiated, but typically starting at \$500/hour plus expenses)
  - 3) Occasionally, a performance or incentive fee, usually expressed as a percentage of profit
- Rates for customized solutions and institutional portfolios are usually negotiated.*

LOGe typically charges clients an annual management fee paid quarterly in advance, based on the quarter-ending balance as shown by the custodian statements for each account. LOGe offers two tiered fee schedules based on the relationship type.

The first fee schedule is tiered based on the value of each managed account (without aggregation across accounts) and is available for direct or subadvised relationships with the following annual rates:

Individual Account Values	Risk Rebalanced® Strategies or Portfolios
First \$5,000,000	0.90%
Next \$20,000,000	0.70%
Portion over \$25,000,000	0.50%

The second fee schedule is tiered based on the total aggregate value of all subadvised accounts for a given advisor with the following annual rates:

Aggregated Account Values	Assets in Risk Rebalanced® Strategies or Portfolios	Other Assets in Advisor Directed Allocation Programs
First \$10,000,000	0.90%	0.45%
Next \$40,000,000	0.80%	0.40%
Next \$50,000,000	0.70%	0.35%
Portion over \$100,000,000	0.60%	0.30%

“Quarter-ending balance” includes all cash, money market balances and the value of all securities held in the account and supervised by LOGe at the end of March, June, September and December. In certain instances where clients have requested LOGe overlay held-away assets, or have borrowed against their account assets or have requested a leveraged strategy utilizing margin, the value of the authorized leverage and any interest paid will be added to the custodian balances to calculate fees. LOGe does not custody any client assets. Client assets are held by qualified custodians only.

The client’s investment management fee to LOGe is determined in accordance with the above standard fee structure, with exceptions negotiated on a case-by-case basis at LOGe’s sole discretion. Services provided for the above fees are for investment advice. LOGe, in its sole discretion, may negotiate to charge a lesser annual fee or lesser investment management fee based upon, among other criteria,

anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention and/or pro bono activities. Clients may authorize LOGe to deduct its investment advisory fee directly from their custodial accounts. This authorization may be granted under a client's signed Investment Management Agreement. In such cases, LOGe will send the client a copy of the investment advisory fee information prior to or concurrent with its request for payment from the client's custodian, if such information isn't made available by the custodian. In such cases, it is the client's responsibility—not the custodian's—to verify the accuracy of the fee calculation. LOGe will provide detailed fee calculation information at the request of a client.

### **5.1. Fees Payable**

Typically fees are payable quarterly in advance. For new clients or additional contributions to existing accounts, the initial quarterly fee is pro-rated based on the date LOGe's advisory services begin. Hourly charges and performance fees are billed in arrears.

### **5.2. Termination of Relationship**

LOGe's investment strategy is, in part, based on a long-range investment horizon and is typically not well-suited for clients who wish to enter and exit the market often. Our typical Investment Management Agreements provide for the advisory relationship to continue indefinitely until terminated by either party upon three (3) days prior written notice to the other party or in accordance with other mutually agreed-upon terms. LOGe will receive a pro-rated fee based on the date of termination of the investment advisory relationship, and will refund any additional fees which were billed in advance for the balance of the quarter.

If a copy of this Form ADV Part II brochure is not delivered to the client at least 48 hours prior to the client entering into any written advisory contract with LOGe, then the client has the right to terminate the contract without penalty within five (5) business days after entering into the contract. For purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract. If the client terminates the contract on this basis, all fees paid by the Client will be refunded. Any transaction costs imposed by the executing broker or custodian for establishing the custodial account or for trades occurring during those five days are non-refundable.

### **5.3. Minimum Account Value & Alternative Fees**

LOGe has a minimum account value of \$250,000 for new clients. Under certain circumstances, the firm may waive this minimum account value or negotiate an alternative advisory fee based on the nature of the client account.

#### **5.4. General Fee Disclosures**

LOGe fees are competitive with those charged by other investment advisors for comparable services. However, comparable services may be available from other sources for lower fees than those charged by the firm.

Clients will incur certain charges imposed by their custodians and other third parties, such as custodial fees, deferred sales charges, odd-lot differentials, canceled order fees, foreign security tax withholdings, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, clients will incur charges by the executing broker-dealer in the form of brokerage commissions and transaction fees on the investment transactions entered into for their accounts. All such charges, fees and commissions are exclusive of and in addition to LOGe's fees.

To the extent that a client requests the use of portfolio margin for a levered investment or , and portfolio margin is thereafter employed by LOGe in the management of the client's investment portfolio, the value of the client's account for billing purposes will increase, along with the corresponding fee paid to LOGe. As a result, in addition to understanding and assuming the additional principal risks associated with the use of margin leverage, clients authorizing margin are advised of the potential conflict of interest whereby the client's decision to employ leverage correspondingly increases the management fee payable to LOGe. The decision as to whether to employ margin is left to the sole discretion of the client, unless otherwise specified in the Investment Management Agreement.

LOGe may pay a bonus or a share of the fees generated by its staff for new business development, or for servicing existing clients. LOGe may also pay a solicitation fee to third-party firms engaged to secure new assets under management for the firm if disclosed and acknowledged by the client or client advisor.

### **6. PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGERMENTS**

LOGe occasionally accepts clients with accredited investor status who wish to compensate our services with a performance fee based on investment returns. The firm manages client funds in a manner consistent with their specific goals, objectives, and risk preferences. Currently, LOGe only manages separate accounts. The firm does not manage hedge funds or any bundled investment vehicles. There is a potential for a conflict of interest when managing fee-only assets and performance fee assets. LOGe has in place supervisory systems and controls reasonably designed to identify and prevent and/or correct any such conflicts. Portfolio construction is consistent with each client's individual risk tolerance and objectives.

### **7. TYPES OF CLIENTS**

LOGe generally provides investment and/or currency risk management advice to:

- Individuals
- Trusts
- Businesses
- Foundations
- Institutions

As of this filing, over 90% of LOGe accounts were individuals (including high net worth individuals) and trusts, and fewer than 10% were foundations, businesses or institutions. LOGe manages each account through either a direct client agreement, or a subadvisory agreement with a registered investment advisor.

## **8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF LOSS**

LOGe's methods of security analysis vary depending on the investment program, but may include:

- Quantitative analysis
- Technical analysis
- Fundamental analysis
- Flow of funds analysis

The main sources of information that LOGe uses include:

- Proprietary quantitative analytics
- Capital Market data feeds
- Financial newspapers and magazines (and websites)
- Inspection of corporate activities
- Research materials prepared by others
- Annual reports, prospectuses, and filings with the Securities and Exchange Commission
- Company press releases
- Other publicly available information

The investment strategies LOGe employs include:

- Long-term purchases (securities held at least one year)
- Short-term purchases (securities sold within a year)
- Trading (securities sold within 30 days)
- Short sales
- Margin transactions
- Options, including covered and uncovered options, spread and other multi-leg strategies

LOGe continually monitors client portfolios and usually rebalances asset allocations on a quarterly basis, and as necessary. LOGe may engage in more or fewer securities transactions on behalf of clients during any particular quarter depending on market conditions or changes in client portfolio strategy. The firm



does not engage in “day trading”, “high frequency trading” or any other form of “excessive trading.” Custom solutions may require more or less trading activity than core LOGe strategies.

Cash balances may be maintained in client custodial accounts for liquidity, as collateral against futures or options positions, or to settle securities purchased. Cash balances are typically invested in money market funds or in short term equivalents.

All LOGe investment strategies are part of a basic investment management philosophy. The firm believes that investors should have managed exposures to different risk/return profiles as part of a prudent investment management program. In general, LOGe pursues an aggregate strategy to generate attractive diversified returns without depending on one specific asset class or risk to provide the majority of a portfolio’s performance. Investing in securities involves risk of loss that clients should be prepared to bear, including the entire amount invested, and, in the case of a levered portfolio through margin or short options, more. LOGe offers no warranties or guarantees of performance and applies its best efforts as a fiduciary and professional manager.

With any investment there are material risks involved when utilizing option overlay strategies and these strategies may not achieve the stated goals and the client risks the loss of his/her investment and the client should be prepared to bear such losses. The trading of options and other derivatives may be highly speculative at times and may entail risks that are greater than those present when investing in other securities.

We strongly encourage clients and prospects to read *CHARACTERISTICS AND RISKS OF STANDARDIZED OPTIONS* by contacting us directly or going to the following link:

<http://www.optionsclearing.com/about/publications/character-risks.jsp>.

## **9. DISCIPLINARY INFORMATION**

LOGe the firm has no past or current legal and/or disciplinary issues, nor do any of its control persons. The SEC requires all registered investment advisors to disclose material facts about any legal or disciplinary event that is material to a client’s (or prospective client’s) evaluation of the integrity of the advisor or its management personnel.

## **10. OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS**

LOGe and its management personnel have no relationships or affiliations with any related financial industry participants or Broker/Dealers other than those noted below or in the supplemental Form ADV 2B(s). Neville McCaghren, LOGe’s former CEO, personally entered into a membership purchase agreement with Jeffrey Wycoff and Ralph Drybrough, LOGe co-founders and presently managing partners of Fort Point Capital Partners, LLC, to sell all his membership interests in LOGe to Mr. Wycoff

and Mr. Drybrough . Mr. Wycoff and Mr. Drybrough are now members, managers, owners, and control parties of LOGe and Mr. McCaghren is no longer affiliated with LOGe.

Mr. Drybrough and Mr. Wycoff are principal owners of Cypress Point Capital Management and Fort Point Capital Partners, each an SEC-registered Investment Adviser. Cypress Point may, at times, provide sub-advisory management services to Fort Point's clients. The fees charged by LOGe are separate from those fees charged by Fort Point and Cypress Point, or any other sub-advisor or any limited partnerships or private investment programs with which client assets may be invested. Though Fort Point and Cypress Point do not receive any advisory or referral fees from LOGe, Mr. Drybrough and Mr. Wycoff have a financial interest in LOGe that may give Fort Point an incentive to recommend LOGe's investment advisory services and products and represents a potential conflict of interest. Notwithstanding this potential conflict of interest, Fort Point will only recommend a subadvisor or product of a subadvisor when it believes the investment to be in the best interest of a client, considering the client's objectives, risk tolerance, limitations and capital available for investment.

Additionally, Mr. Wycoff and Mr. Drybrough are registered representatives of Gordian Investment Solutions, a FINRA-member broker/dealer. Mr. Wycoff and Mr. Drybrough may be compensated by Gordian Investment Solutions for sale of a series of Cypress Point Investment Partners ("CPIP"), a pooled investment vehicle sponsored by Cypress Point Capital Management. Though principals of LOGe are registered representatives of Gordian Investment Solutions, LOGe does not recommend Gordian Investment Solutions as a custodian or executing broker for its advisory clients or their transactions. The business relationship with Gordian Investment Solutions is limited to distribution of CPIP access vehicles to investors. Refer to Item 12 below for more information regarding Fort Point's selection of broker/dealers and custodians.

In certain cases LOGe offers its advisory services through subadvisory agreements, whereby LOGe enters into an agreement with another registered investment advisor, who in turn enters into an agreement with the end-client.

From time to time LOGe may enter into agreements with third-party firms engaged to secure new assets under management for the firm. These agreements include the payment of a solicitation fee for new assets brought under LOGe management, usually calculated as a percentage of the standard fees generated by those new assets, and do not result in additional fees to the client. If a new client relationship is subject to a solicitation fee, LOGe will make the client or client advisor aware of the solicitation fee arrangement and require a signed disclosure acknowledgement prior to providing services.

## **11. CODE OF ETHICS**

LOGe has built a reputation based on the professionalism of the organization and its employees. LOGe maintains its Code of Ethics as a separate document, available to all clients upon request, and within the firm's Policies and Procedures Manual. LOGe's Code of Ethics is predicated on the following principles:

- The interests of clients must and will come first.
- Personal investment must comport with the Code and must avoid any actual or potential conflicts of interest.
- The Company or its agents or representatives will not take inappropriate advantage of their position.
- Employees of the Company will not invest client funds in securities in which its employees have an undisclosed financial interest.
- Employees of the Company will not use client assets to affect the prices at which they trade their own securities.

LOGe and its employees do not buy securities for ourselves from advisory clients, or sell securities we own to advisory clients in principal transactions. We may, however, invest alongside clients in LOGe's strategies, or we may buy or sell for ourselves securities that we may or may not recommend to advisory clients, based on our own individual investment views and objectives.

All employees must comply with the Policies and Procedures of the firm, including its Code of Ethics. Each employee signs an annual affidavit that 1) the employee is in receipt of the firm's Policies and Procedures Manual and 2) the employee is in compliance with all requirements contained in the document.

The Policies and Procedures Manual outlines all governance matters for LOGe, including but not limited to the following: Code of Ethics, Anti-Money Laundering, Books and Records, Conflicts of Interest, Personal Trading, Privacy, and Standards of Business Conduct.

The Policies and Procedures Manual is updated on an annual basis to reflect changes in regulatory, procedural or best practice policies. Additionally, the firm maintains an annual Compliance Program Review Checklist and Report to audit the firm's practices and compliance.

## **12. BROKERAGE PRACTICES**

### **12.1. Best Execution**

LOGe seeks the best overall execution of transactions for client accounts consistent with the firm's judgment as to the business qualifications of the various broker-dealers with which the firm does business. In selecting broker-dealers to effect securities transactions for clients, LOGe selects broker-dealers based on its consideration of their financial soundness, ability to execute effectively and efficiently, report, clear and settle the order, and accurately communicate with LOGe's trading desk and operations team and charge commission rates which, when combined with these services, will produce the most favorable total cost or proceeds for each transaction under the circumstances. "Best execution" is generally understood to mean the most favorable cost or net proceeds reasonably obtained under the circumstances.

LOGe's approach to seeking best execution focuses on consideration of explicit commission costs or spreads as well as on critically important factors such as minimizing market impact and price movements and achieving the firm's overall investment goals. The firm seeks to negotiate commission rates which, when combined with the factors used in the selection of brokers, will produce the favorable total cost or proceeds for each transaction under the circumstances. LOGe is not obligated to choose the broker-dealer offering the lowest available commission rate if, in its reasonable judgment, there is a risk that the total cost or proceeds from the transaction may be less favorable than may be obtained elsewhere, or, if a higher commission is justified by trading services provided by the broker-dealer, or if other considerations, such as those set forth above dictate utilizing a different broker-dealer. While LOGe's approach is to contain explicit trading costs, these considerations may not predominate in seeking to achieve the firm's overall investment goals in the best interests of our clients.

LOGe does not use client brokerage to compensate or otherwise reward brokers for client referrals.

## **12.2. Trade Allocation & Aggregation**

Trade allocation decisions are made among client accounts to ensure fair and equitable treatment of client accounts. Investment decisions are generally applied to all accounts utilizing that particular strategy, taking into consideration client restrictions, instructions and individual needs. LOGe, when rebalancing individual accounts, may or may not have an opportunity to aggregate or "block" trades; thus there may be disparity in price or commissions among clients. When the brokerage firm has not been designated by the clients, LOGe may, but is not obligated to, aggregate or "block" trades of securities to be purchased or sold into block trades in order to seek the most favorable execution and lower brokerage commissions in such manner as LOGe deems equitable and fair to the clients. As a general rule, all accounts for which trades are aggregated will receive the same average execution price for that day. All allocations of block trades, including expenses incurred in the transaction, shall be made on a fair and equitable basis over time, to the extent practicable, without favoring any account or type of account or client over another over a period of time. In cases when a trade is not completed in a single "blocked" day, LOGe will allocate the traded shares on a pro-rata basis among all of the accounts in the trade block. LOGe is not obligated to aggregate trades in any circumstances. The choice of the method of trade allocation will be based on various factors including how much of the total block was completed and the liquidity of the issue being traded. Although LOGe generally seeks to allocate investment opportunities as fairly and equitably as possible over the long term, the firm cannot assure the equal participation of every client in every investment opportunity or every transaction. LOGe may determine that a limited supply or demand for a particular opportunity or investment or other factors noted above may preclude the participation of some clients in a particular investment opportunity or trade.

## **12.3. Client Directed Brokerage**

In some cases, clients or their primary advisors have directed LOGe to use a specified broker-dealer, or a custodian which executes trades through an affiliated broker-dealer, for portfolio transactions in their

account. In these cases, LOGe is not obligated to, and will generally not solicit competitive bids for each transaction or seek the lowest commission rates for the client as the commission rates have typically been pre-negotiated between the client and the broker or custodian and LOGe is unable to supersede the terms of that agreement. As such, the client may pay higher commission and transaction costs, or receive less favorable security prices than it otherwise would have had it not directed LOGe to trade through a specific broker or custodian, since LOGe has not negotiated the rate and may not be able to obtain volume discounts. In addition, the client may be unable to obtain the most favorable price on transactions executed by LOGe as a result of the firm's inability to aggregate/bunch the trades from this account with other client trades. As a result of the special instruction, LOGe may not execute client securities transactions with brokers that have been directed by clients until non-directed brokerage orders are completed. Accordingly, clients directing brokerage or custody may not generate returns equal to clients that do not direct brokerage. Due to these circumstances, there may be a disparity in commission rates charged to a client who directs LOGe to use a particular broker and performance and other differences from other similarly managed accounts. Clients who direct brokerage should understand that similar brokerage services may be obtained from other broker-dealers at lower costs and possibly with more favorable execution.

#### **12.4. Soft Dollar Arrangements**

LOGe is not currently a party to any formal soft dollar arrangements whereby an executing broker-dealer provides or purchase on its behalf investment research materials or brokerage-related services known as "soft dollar" products or services (such as economic and market information, portfolio strategy advice, research conferences, periodical subscription fees, performance measurement data, online pricing, news wire charges, quotation services, computer hardware and software) in exchange for LOGe directing commissionable trade executions to that broker-dealer. If LOGe elects to enter into soft dollar arrangements in the future, its policy would be to limit such arrangements to those falling within the safe harbor of Section 28(e) of the Securities and Exchange Act of 1934, as amended.

### **13. REVIEW OF ACCOUNTS**

#### **13.1. Reviews & Reviewers**

All client accounts are reviewed at least monthly to ensure that transactions and portfolio holdings:

- Conform to client objectives and investment guidelines;
- Are consistent with liquidity needs in the client account; and
- Conform to the firm's investment strategies.

LOGe's client accounts are reviewed by Jeffrey Wycoff and/or Ralph Drybrough, whose backgrounds are presented in their respective Form ADV Part 2B - Brochure Supplements. Mr. Wycoff and Mr. Drybrough

have discretion on investment decisions for clients, and currently review all client accounts, most of which are managed under subadvisory agreements.

### **13.2. Nature & Frequency of Reporting to Clients**

LOGe provides each client with a quarterly statement within 30 days following the end of the quarter if such information is not available from the client's custodian. Additionally, on a monthly basis, the custodian provides each client a detailed valuation of individual securities, their cost and market value, and a summary of the total account by security type. The custodian report also includes a transaction history showing all purchases and sales during the period and fees deducted by LOGe and otherwise incurred by the account.

## **14. CLIENT REFERRALS & OTHER COMPENSATION**

LOGe does not receive or accept any benefits from a non-client for providing advisory service to clients.

LOGe is a party to third party marketing arrangements whereby it pays referral fees to persons or entities that refer clients to the firm. The marketing arrangements will be consistent with Rule 206(4)-3 of the Investment Advisers Act as amended. Under no circumstances will the client be disadvantaged by the payment of such fees. Clients of the firm whose accounts involve third party marketing arrangements would be advised of the arrangement and would not pay higher fees as a result of the arrangement.

## **15. CUSTODY**

LOGe requires that clients custody their investment securities away from the firm. Fidelity, Interactive Brokers and TD Ameritrade currently provide custody and brokerage services for our clients. As stated in Section 13 of this brochure, LOGe relies on our custodians to provide each client monthly reconciliation statements that include balances, transactions, and cash flow activity via traditional mail or electronic media.

Clients are encouraged to review the custodial statements to determine whether account transactions, including deductions to pay advisory fees, are in accordance with the investment management or subadvisory agreement.

## **16. INVESTMENT DISCRETION**

LOGe provides investment supervisory services with discretion to supervise, invest and trade client assets consistent with established client objectives and guidelines, without pre-approval from clients for

each trade. In certain instances, typically at the request of professional investors or institutional clients, LOGe may agree to consult or otherwise advise assets held in an account over which the firm has no discretionary authority, or use a discretionary account to overlay or complement assets in an unmanaged account.

## **17. VOTING CLIENT SECURITIES**

LOGe does not vote proxies on behalf of its clients. LOGe clients will receive proxy information from their custodians and/or brokerage firms, and are encouraged to seek advice about how to vote in their best interests.

## **18. FINANCIAL INFORMATION**

LOGe is profitable as of this filing. It is not a custodian of client assets and is not required to disclose financial information. The firm does not have any condition reasonably likely to impair its ability to meet contractual commitments to clients.

*A companion document, Part IIB of the Form ADV, provides supplemental information on advisory personnel and is available upon request.*